



Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Family Safety Plan

October 2024



About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <
<https://www.salvationarmy.org.au/>>





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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQA+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQA+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQA+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>





Executive summary

The Salvation Army welcomes the opportunity to provide this submission to Secretariat of National Aboriginal and Islander Child Care (SNAICC) in relation to the Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Family Safety Plan (the Family Safety Plan) Engagement inquiry.

The Salvation Army operates specialist family and domestic violence services in almost every state and territory across Australia. This support includes refuge and crisis accommodation, children’s and parenting services, counselling, men’s programs, and advice and referral. We also interact with those impacted by family and domestic violence through a range of frontline services, including our Doorways case management, alcohol and other drug, housing and homelessness, and youth services.

The Salvation Army is not a specialist Aboriginal and Torres Strait Islander service provider, though Aboriginal and Torres Strait Islander people are overrepresented in almost every service we deliver. We have approached this submission from the perspective of our frontline services and in consultation with our Aboriginal and Torres Strait Islander team. Our hope is to highlight the systemic gaps we are seeing that impact the Aboriginal and Torres Strait Islander victim-survivors and persons using violence that we serve.

At the heart of our recommendations, is the critical need for Aboriginal and Torres Strait Islander organisations and communities to lead, drive, and have ownership over interventions and solutions for the community.

In this submission, The Salvation Army covers:

- **Overarching principles.** We highlight that self-determination and community-driven solutions, community consultation, listening to the voices of children, and embedding cultural strengths and healing are integral to the Family Safety Plan.
- **Key systemic and institutional reforms.** We discuss the importance of partnerships and collaboration with the wider service sector, building cultural competency, ensuring the system is equipped to meet the needs of victim-survivors, and the need to support culturally driven and safe data collection and outcomes management.
- **Supporting children and young people.** We highlight the need to ensure children and young people have access to specialised services, the need to address adolescent violence in the home, and to prevent over-reporting to child protection agencies.
- **Ensuring services understand their roles and responsibilities** under the Family Safety Plan.

The Salvation Army has made **14** recommendations for SNAICC to consider. A summary of these recommendations follows on the next page.



Summary of recommendations

Recommendation 1

1.3 The Salvation Army recommends that the Family Safety Plan include self-determination, community-driven solutions, listening to the voices of children, and embedding cultural strengths and healing as key overarching priorities to end violence against Aboriginal and Torres Strait Islander people.

Recommendation 2

2.6 The Salvation Army recommends that the Family Safety Plan highlights the need for investment in the development and maintenance of strong partnerships between the wider service sector and Aboriginal Controlled Community Organisations.

Recommendation 3

2.10 The Salvation Army recommends that the Family Safety Plan highlights the need to implement mandatory cultural competency training for the wider service sector. Training should include the nature of family violence within Aboriginal and Torres Strait Islander communities, unconscious bias and racism, and misidentification and barriers to seeking help.

Recommendation 4

2.15 The Salvation Army recommends that the Family Safety Plan highlights the need to strengthen and build the Aboriginal and Torres Strait Islander workforce in preventing and responding to family and domestic violence.

Recommendation 5

2.22 The Salvation Army recommends that the Family Safety Plan highlights the need to significantly increase investment in ACCOs to achieve best outcomes for Aboriginal and Torres Strait Islander victim-survivors.

Recommendation 6

2.28 The Salvation Army recommends that the Family Safety Plan highlights the importance of integrated service responses to better support the intersectional needs of those impacted by family and domestic violence. This should be accompanied by significant investment into ensuring choice for victim-survivors within the sector.

Recommendation 7

2.34 The Salvation Army recommends that the Family Safety Plan highlights the need to support those impacted by family and domestic violence in regional and remote communities by:

- *listening to the voices of lived experience when rolling out programs in regional and remote areas to ensure that programs are tailored to the needs of particular communities; alongside*
- *the need for a significant injection of funding to ensure a range of service options are available in regional and remote communities.*

Recommendation 8

2.43 The Salvation Army recommends that the Family Safety Plan highlights the need to:



- 
- *Increase the stock of safe accommodation options that respond to the safety and cultural needs of local communities - particularly in regional and rural areas where there are no or limited crisis options;*
 - *Address bottlenecks in crisis and transitional housing due to a lack of exit pathways; and*
 - *Support sustainable housing outcomes through investment in long-term case management support options.*

Recommendation 9

2.48 The Salvation Army recommends that the Family Safety Plan highlights the need to invest in community driven, sustainable, and culturally informed intervention programs for Aboriginal and Torres Strait Islander persons who use violence.

Recommendation 10

2.57 The Salvation Army recommends that the Family Safety Plan highlights the need for the development of a data and evidence eco-system that is led by Aboriginal and Torres Strait Islander researchers and communities.

Recommendation 11

3.11 The Salvation Army recommends that the Family Safety Plan highlights the need to invest in a specialist family and domestic violence response developed specifically for Aboriginal and Torres Strait Islander children and young people impacted by family and domestic violence.

Recommendation 12

3.16 The Salvation Army recommends that the Family Safety Plan highlights the importance of investing in early intervention efforts to support children and young people using, or at risk of using, violence in the home. Interventions must be holistic, work with the whole family, and be culturally appropriate.

Recommendation 13

3.22 The Salvation Army recommends that the Family Safety Plan emphasises the need to review mandatory reporting and child protection legislation to ensure systems are trauma-informed and culturally safe.

Recommendation 14

4.5 The Salvation Army recommends the need for clarity regarding how the Family Safety Plan will interact and align with the National Plan to End Violence against Women and Children.





1 Overarching principles

- 1.1 The Salvation Army suggests that the following principles are integral to ensuring real and sustainable change for Aboriginal and Torres Strait Islander families.
- 1.2 These principles frame all of our recommendations throughout this submission, and we believe they should underpin the Family Safety Plan:
 - **Self-determination and community-driven solutions.** Aboriginal and Torres Strait Islander communities are diverse, as are their experiences of colonisation, discrimination and trauma. Responses to family and domestic violence need to be community-specific and consider the local context. Recovery, healing and support needs to be owned and driven by the community. It is essential that Aboriginal and Torres Strait Islander communities and organisations are positioned to drive, lead, and develop projects that recognise the cultural and geographical needs, and the differing nature and prevalence of violence in local communities.
 - **Community consultation.** It is only through listening to and centering Aboriginal and Torres Strait Islander voices that there will be lasting solutions which achieve healing and recovery. We highlight the need for direct consultation with Aboriginal and Torres Strait Islander Elders and community leaders at all stages of development, implementation, and review to ensure family and domestic violence interventions meet the needs of local communities.
 - **Listening to the voices of children and young people.** The overwhelming burden of violence experienced by Aboriginal and Torres Strait Islander women often adversely affects children and young people.¹ Children are often the ‘silent victims’ of family and domestic violence.² We acknowledge the importance of listening to the voices of Aboriginal and Torres Strait Islander children and young people and emphasise the need to develop culturally responsive mechanisms for their voices to inform family and domestic violence reforms.
 - **Embedding cultural strengths and healing.** Aboriginal and Torres Strait Islander cultures and communities already possess the essential tools for healing from trauma.³ We highlight the need to invest in and embed the healing practices and approaches of Aboriginal and Torres Strait Islander people within family and domestic violence responses. This should include, but not be limited to, facilitating the sharing of stories related to family safety and healing through yarning circles, ensuring those impacted by family and domestic violence are supported to maintain connection to Country, and recognising the strengths of kinship laws and practices.

¹ Australian National Research Organisation for Women’s Safety. (2022). *New Ways for our Families: Designing an Aboriginal and Torres Strait Islander cultural practice framework and system responses to address the impacts of domestic and family violence on children and young people*. https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2022/04/06172004/Morgan-et-al-RR1_NewWaysOurFamilies.pdf.

² O’Brien, W, Fitz-Gibbon, K. (2016). ‘*Silent victims*’: royal commission recommends better protections for child victims of family violence. <https://theconversation.com/silent-victims-royal-commission-recommends-better-protections-for-child-victims-of-family-violence-56801>.

³ Commonwealth of Australia Department of Social Services. (2023). *Aboriginal and Torres Strait Islander Action Plan 2023-2025*. https://www.dss.gov.au/sites/default/files/documents/10_2023/dedicated-action-plan.pdf.





Recommendation 1

- 1.3 The Salvation Army recommends that the Family Safety Plan include self-determination, community-driven solutions, listening to the voices of children, and embedding cultural strengths and healing as key overarching priorities to end violence against Aboriginal and Torres Strait Islander people.**

2 Key systemic and institutional reforms

Partnership and collaboration with Aboriginal and Torres Strait Islander communities

- 2.1 We draw attention to the need for strong partnerships and genuine collaboration between the wider service sector and Aboriginal Controlled Community Organisations (ACCOs). This will ensure that mainstream service responses are culturally responsive and do not retraumatise or do more harm for Aboriginal and Torres Strait Islander victim-survivors. We believe that strong and meaningful partnerships are critical to achieve target 13 of the National Agreement on Closing the Gap (National Agreement).⁴
- 2.2 In our experience, communication and collaboration between the wider service sector and ACCOs can be limited, which risks inhibited outcomes for Aboriginal and Torres Strait Islander victim-survivors who are accessing mainstream services.
- 2.3 The Salvation Army understands that our role as a larger organisation is not to drive service delivery in Aboriginal and Torres Strait Islander communities, but rather to support interventions when invited. We have learned firsthand the impact that partnering with a local Aboriginal and Torres Strait Islander program can have on improving outcomes for community members. The below case study details The Salvation Army's experience partnering with a local organisation in Alice Springs.

Red Dust

The Salvation Army had received funding to deliver an alcohol and other drugs (AOD) program focused on supporting Aboriginal and Torres Strait Islander men in Alice Springs. Our program was struggling to attract Aboriginal and Torres Strait Islander men to access the service. After listening to the community, The Salvation Army entered into an arrangement for Red Dust, a local Aboriginal and Torres Strait Islander organisation to deliver the program, while The Salvation Army retained responsibility for contract administration, reporting and risk through a joint governance group.

The Red Dust methodology focuses on both complex family dynamics and the individual, and engages community members through activities such as yarning circles, and traditional activities on Country. The effect is 'side by side' counselling to talk about drugs, violence, anger and other experiences. A focus of the service is helping participants navigate both traditional and western ways of living. The result of this partnership is that the service attracts five times the number of Aboriginal and Torres Strait Islander men than before and that the community is actively involved in referring men to seek assistance.

⁴ Australian Government Productivity Commission. *Socioeconomic outcome area 13 – Aboriginal and Torres Strait Islander families and households are safe*. <https://www.pc.gov.au/closing-the-gap-data/dashboard/se/outcome-area13>.



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- 2.4 We suggest that encouraging collaboration and partnership could include supporting interventions that have already partnered with local Aboriginal and Torres Strait Islander organisations and services, or which have been co-designed by people from the community who possess cultural knowledge. We point to our Open House service below as an example.
- 2.5 Funding does not often recognise the monetary investments required to develop and maintain effective relationships and partnerships between services. We suggest the need to include quarantining funding for partnerships between ACCOs and non-indigenous services in funding grants.

Open House Darwin

The Salvation Army's Open House Program in Darwin provides residential support for individuals on bail, parole, or home detention, with a particular focus on men facing family and domestic violence charges.

A central element of the program is the comprehensive assessment of each resident's background and current needs. These assessments help staff to identify underlying issues such as substance use incurring harm, mental ill-health, and trauma, which may contribute to offending behaviours. The goal of the service is to change the trajectory of men who use violence and break the cycle of offending. Open House recognises the importance of culturally safe and responsive care for Aboriginal and Torres Strait Islander residents, who make up a significant portion of those who access the service. To meet their cultural and social needs, Open House has formed strong partnerships with various Aboriginal and Torres Strait Islander organisations, including:

- North Australian Aboriginal Justice Agency;
- Danila Dilba Health Service;
- Darwin Indigenous Men's Service program;
- Darwin Indigenous Women's Service program;
- Yilli Housing;
- Family Assistance Resources for Women and Aboriginal Regional Development; and
- Council for Aboriginal Alcohol Program Services.

These partnerships enable the delivery of culturally appropriate services that are aligned with the residents' unique social and cultural contexts, such as men's yarning circles. The Open House program also prioritises access to therapeutic and rehabilitative services designed to foster personal accountability and support community reintegration. The program's holistic approach seeks to address the root causes of violent behaviour and creates pathways for long-term change.

The Salvation Army is committed to expanding the program's reach and deepening its impact by refining culturally safe practices, strengthening community networks, and sharing the learnings from this model with other regions.

Recommendation 2

- 2.6 **The Salvation Army recommends that the Family Safety Plan highlights the need for investment in the development and maintenance of strong partnerships between the wider service sector and Aboriginal Controlled Community Organisations.**

Building a culturally competent service sector

- 2.7 We continue to see responses from both government and non-government services towards Aboriginal and Torres Strait Islander victim-survivors and persons using violence that are not culturally safe. We believe that cultural competency and capability is inherent in ensuring culturally safe service delivery for Aboriginal and Torres Strait Islander people and communities impacted by violence. Cultural competency and capability ensure inclusive and culturally safe environments that are accessible for Aboriginal and Torres Strait Islander staff to feel valued and thrive.
- 2.8 Every part of the system needs to be culturally safe and responsive to holistically address the needs of Aboriginal and Torres Strait Islander peoples. We point to the following reforms that we believe can enhance cultural competency and ultimately lead to more culturally safe and aware service provision.

Training for justice and frontline services

- 2.9 The Salvation Army believes that regular, mandated training for justice systems and the wider service sector is critical to building cultural competency. We suggest that training could include the following topics:
- **The differing nature of violence within Aboriginal and Torres Strait Islander communities**, and the neo-colonial context of violence. We suggest that family and domestic violence must be understood within the context of the breaking down of the Kinship system and the ongoing impacts of colonisation and discrimination. This includes understanding how social issues that lead to violence in Aboriginal and Torres Strait Islander communities are themselves symptoms of the complex legacies of colonisation, inequality, and racism.
 - **Racism and unconscious bias.** Research has found that most Australians tested for unconscious bias hold a negative view of Aboriginal and Torres Strait Islander people, which can lead to widespread racism.⁵ This issue of unconscious bias is not confined to the family and domestic violence service and justice systems, and training must be implemented to make certain that all responses are culturally safe and competent.

⁵ Shirodkar, S. (2019). Bias against Indigenous Australians: Implicit association test results for Australia. *Journal of Australian Indigenous Issues*, 22(3-4), 3-34. <https://search.informit.org/doi/10.3316/informit.150032703197478>

- **Misidentification and barriers to seeking help.** Our services continue to report a high number of women being misidentified as the person using violence. The misidentification of victim-survivors can occur in a range of contexts, but it primarily occurs where victim-survivors are misidentified on a domestic violence order or face criminal charges.⁶ We suggest that training should extend to understanding of the unique barriers which disempower Aboriginal and Torres Strait Islander victim-survivors from seeking help or disclosing violence. Some of these barriers include fear of child protection responses, insecure housing, and distrust of state agencies and services.⁷

Recommendation 3

2.10 The Salvation Army recommends that the Family Safety Plan highlights the need to implement mandatory cultural competency training for the wider service sector. Training should include the nature of family violence within Aboriginal and Torres Strait Islander communities, unconscious bias and racism, and misidentification and barriers to seeking help.

Investing in the Aboriginal and Torres Strait Islander workforce

- 2.11 There is a need to strengthen and build the Aboriginal and Torres Strait Islander workforce in the family and domestic violence sector.
- 2.12 We suggest that critical to this, is investing in and developing culturally appropriate educational and upskilling pathways – such as traineeships, graduate programs, paid work placements, and study grants – that are accessible and culturally safe. We also suggest working to ensure that human resources and employment processes are culturally aware and do not act as a barrier to onboarding or retaining Aboriginal and Torres Strait Islander staff, and that remuneration for identified roles reflects levels of cultural expertise.
- 2.13 Any efforts to strengthen and build the Aboriginal and Torres Strait Islander workforce needs to be coupled with a commitment to ensure flexibility within the programs. Programs must be adaptable to different community needs and priorities rather than adhering to strict protocols. It is also important to allow for shared positions to reduce the likelihood of staff burn out.

⁶ Victoria Government. (Undated). *Presentations of family violence in different relationships and communities*. <https://www.vic.gov.au/maram-practice-guides-foundation-knowledge-guide/presentations-family-violence-different>.

⁷ Australian National Research Organisation for Women's Safety. (2020). *Improving family violence legal and support services for Aboriginal and Torres Strait Islander peoples: Key findings and future directions*. (Research to policy and practice, 25-26/2020). Sydney: ANROWS.



2.14 The Salvation Army points to the Strong Women Strong Babies program that operates in the Northern Territory as an example of best practice. The inclusion of Aboriginal and Torres Strait Islander knowledge and practice as a fundamental component of the program is key to its success.⁸ Members from the community are employed on a flexible basis and the program has been successful in responding to local needs and priorities by adapting the services they offer for different communities.

Recommendation 4

2.15 The Salvation Army recommends that the Family Safety Plan highlights the need to strengthen and build the Aboriginal and Torres Strait Islander workforce in preventing and responding to family and domestic violence.

Ensuring the system can meet the needs of victim-survivors

Fully funding Aboriginal Community Controlled Organisations (ACCOs)

- 2.16 The Salvation Army calls on governments to invest in and place emphasis on family and domestic violence programs and initiatives that are developed and facilitated by Aboriginal and Torres Strait Islander people, for members of their communities who are experiencing or using violence.
- 2.17 ACCOs are best placed to understand the cultural and geographical needs of Aboriginal and Torres Strait Islander people impacted by violence and are able to draw on cultural strengths in the delivery of family and domestic violence services to achieve best outcomes. We highlight the need to invest in ACCOs to ensure the availability of a range of culturally responsive resources not only in responses to family and domestic violence, but in the contexts of primary prevention, early intervention, and recovery and healing from violence.
- 2.18 The Salvation Army also points to the need to ensure ACCOs are fully funded and well equipped to establish and deliver services within their community. Our services report seeing insufficient funding and supporting infrastructure provided to ACCOs in local communities. In our experience, this has only made the setting up of community-led services more difficult and has risked overburdening Aboriginal and Torres Strait Islander communities.
- 2.19 We reiterate the importance of partnerships between the ACCO and wider service sector to ensure that ACCOs are well supported to deliver family and domestic violence services. We suggest that existing family and domestic violence specialist services with backroom support can be funded to partner with and support ACCOs in their responses.

⁸ Lowell, A, Kildea, S, Liddle, M, Cox, B, Paterson, B. (2015). Supporting aboriginal knowledge and practice in health care: lessons from a qualitative evaluation of the strong women, strong babies, strong culture program. *BMC Pregnancy Childbirth*. 15, 19. <https://bmcpregnancychildbirth.biomedcentral.com/articles/10.1186/s12884-015-0433-3>.





2.20 For example, The Salvation Army have a formal partnership with the Mura Kosker Sorority – an Aboriginal and Torres Strait Islander not-for-profit organisation. The Mura Kosker Sorority works to advocate for human rights and improve family and kinship wellbeing through tailored services and supports, amongst some of the most remote communities in the Torres Strait.⁹ The Salvation Army’s Doorways services set aside funding to support Mura Kosker to provide emergency relief by completing and managing intake assessments. This support allows Mura Kosker to access and utilise emergency relief services locally.

2.21 We also draw attention to our Red Dust partnership outlined on page 10.

Recommendation 5

2.22 The Salvation Army recommends that the Family Safety Plan highlights the need to significantly increase investment in ACCOs to achieve best outcomes for Aboriginal and Torres Strait Islander victim-survivors.

Wraparound services responsive to intersectional needs

2.23 The Salvation Army emphasises the need for integrated service responses to ensure the family and domestic violence sector is well equipped to respond to the intersectional needs of victim-survivors.

2.24 The Salvation Army’s family and domestic violence services support a broad range of Aboriginal and Torres Strait Islander people that present with multiple complex needs, and who are often navigating several service systems, agencies, and case managers. This leaves victim-survivors needing to repeatedly share their story which can be re-traumatising and, in our experience, contributes to hesitancy in seeking support. A lack of communication and collaboration between local services can also leave frontline workers unsure of how they can best support victim-survivors of family violence. It can also lead to frontline staff duplicating the work of other agencies.

2.25 Integrated service responses, underpinned by collaborative practice, can work to ensure that the service sector does not cause more harm to victim-survivors seeking help.¹⁰ They provide a mechanism for improved communication and knowledge sharing, and allow frontline services to work together more effectively. This reduces systemic barriers to support for victim-survivors, and promotes improved safety outcomes through more accurate risk assessment and coherent responses.¹¹

⁹ Mura Kosker Sorority. (Undated). *About Us*. <https://murakosker.org.au/about-mura-kosker/>.

¹⁰ ANROWS. (2020). *Working across sectors to meet the needs of clients experiencing domestic and family violence*. <https://anrowsdev.wpenginepowered.com/wp-content/uploads/2020/08/Interagency-Synthesis-ANROWS-Insights.pdf>.

¹¹ Ibid.





- 2.26 We suggest that in the development and implementation of integrated responses, breaches of confidentiality must be taken into account. Our frontline services have reported that Aboriginal and Torres Strait Islander victim-survivors accessing our services are often hesitant to engage with ACCOs out of fear they may know or be related to staff. In our experience, there is often only one funded ACCO in local communities, and if that ACCO is not suitable for any reason, there is no community-led alternative.
- 2.27 Choice is a core principle of a trauma-informed service.¹² We stress that the Aboriginal and Torres Strait Islander, and wider family and domestic violence service sector, need to promote victim-survivor choice and control over service engagement. We press the need for funding to ensure multiple ACCO options are available within local communities.

Recommendation 6

- 2.28 The Salvation Army recommends that the Family Safety Plan highlights the importance of integrated service responses to better support the intersectional needs of those impacted by family and domestic violence. This should be accompanied by significant investment into ensuring choice for victim-survivors within the sector.**

Supporting victim-survivors in regional and remote communities

- 2.29 The Salvation Army stresses the need for a significant injection of funding into grassroots responses in regional and remote communities to ensure that there are community-led services available for Aboriginal and Torres Strait Islander victim-survivors, and persons using violence.
- 2.30 Research has shown that the prevalence and severity of this violence against Aboriginal and Torres Strait Islander people increases with remoteness.¹³
- 2.31 In our experience, concerns surrounding breaches of confidentiality are also amplified in regional and remote communities, which can act as a major barrier to victim-survivors seeking support or trying to leave violence. We reiterate the need for choice of service provider and service options for victim-survivors in regional and remote communities.
- 2.32 The most effective way to reduce family and domestic violence in rural areas is to allow communities to lead the response in a manner that is tailored to their community. Responses in rural and remote communities need to be different from those rolled out in urban communities. What is effective in one town may not be effective in another community.

¹² NSW Health. (2022). *What is trauma-informed care?*

<https://www.health.nsw.gov.au/mentalhealth/psychosocial/principles/Pages/trauma-informed.aspx>.

¹³ Australian Government Productivity Commission. (2014). *Overcoming Indigenous Disadvantage Key Indicators 2014 Report*. <https://www.pc.gov.au/research/ongoing/overcoming-indigenous-disadvantage/2014/key-indicators-2014-report.pdf>.



2.33 Our experience is that many programs in rural areas are currently administered either by the government or large-scale non-government organisations and do not always consider cultural considerations, or community knowledge, skills, relationships, and connections. Implementing a place-based response is critical. Different communities will have different strategies that they believe are effective. Investing in these will enable the most effective response to family and domestic violence.

Recommendation 7

2.34 The Salvation Army recommends that the Family Safety Plan highlights the need to support those impacted by family and domestic violence in regional and remote communities by:

- **listening to the voices of lived experience when rolling out programs in regional and remote areas to ensure that programs are tailored to the needs of particular communities; alongside**
- **the need for a significant injection of funding to ensure a range of service options are available in regional and remote communities.**

Investing in crisis accommodation and housing pathways

2.35 The most effective way to address the immediate safety needs of victim-survivors is to ensure they have access to safe and appropriate housing, and do not have to return to the person using violence.

2.36 One of the most pressing issues our clients face is the rising cost of housing. The housing crisis has significantly diminished the availability of affordable accommodation, making it difficult for individuals to secure safe and stable living arrangements post crisis accommodation. Across all states and territories social housing waiting lists in metropolitan, regional, and rural areas are at an all-time high, and the private rental market is highly competitive and has significantly increased in cost. The need for financial assistance to cover rental deposits, moving costs, and increased rental charges has become paramount.

2.37 At The Salvation Army's refuge in Karratha, Aboriginal and Torres Strait Islander women account for roughly 90 per cent of residents. Currently there is limited crisis accommodation services across the region and capacity is always limited. This lack of services and resources, the ongoing impact of the housing crisis, and increases in cost of living continue to negatively impact on victim-survivors seeking support, and directly influence their choice to leave violent relationships.

2.38 As a result of the housing crisis, the number of victim-survivors able to transition from temporary or crisis accommodation options into long-term accommodation has stagnated. This housing bottleneck has been highlighted by our family and domestic violence services as one of the most urgent issues that governments need to address.





- 2.39 In Karratha our staff are reporting a five-year wait for social housing. The Salvation Army's family and domestic violence service in Karratha is a short-term crisis service, but because of the housing crisis victim-survivors who would access the service for an average of eight to twelve weeks, are currently averaging stays of six to twelve months. Most concerning, the absence of affordable housing exits means that many victim-survivors of family violence feel they have no option but to return to the residence of the person using violence. The extended length of stays in crisis accommodation not only affect victim-survivors who are unable to move into safe and stable long-term accommodation, it also means that other victim-survivors in need cannot enter crisis services. This places increased pressure on service providers.
- 2.40 Our services report that many Aboriginal and Torres Strait Islander victim-survivors also have limited options to keep themselves and their children safe in their community due to the lack of housing. Many are also reluctant to relocate away from their community and kin, or off Country. For other women who do travel great distances to access a service and escape a violent relationship, they often have to return to the person using violence because of the financial pressures and lack of social supports associated with moving to a new area.
- 2.41 In line with the Aboriginal and Torres Strait Islander Action Plan 2023-2025, The Salvation Army believes action is needed to ensure Aboriginal and Torres Strait Islander women and children have access to crisis, medium, and long-term housing options that are safe and culturally appropriate.¹⁴
- 2.42 We also point to the need for investment in supports to maintain successful tenancies to ensure sustainable housing outcomes. In addition to tenancy management, long-term case management support to work alongside victim-survivors is crucial. In our experience, for many victim-survivors, managing a tenancy after leaving a violent relationship is often their first opportunity to manage not only housing, but finances and social connections.

Recommendation 8

2.43 The Salvation Army recommends that the Family Safety Plan highlights the need to:

- **Increase the stock of safe accommodation options that respond to the safety and cultural needs of local communities - particularly in regional and rural areas where there are no or limited crisis options;**
- **Address bottlenecks in crisis and transitional housing due to a lack of exit pathways; and**
- **Support sustainable housing outcomes through investment in long-term case management support options.**

¹⁴ Commonwealth of Australia Department of Social Services. (2023). *Aboriginal and Torres Strait Islander Action Plan 2023-2025*. https://www.dss.gov.au/sites/default/files/documents/10_2023/dedicated-action-plan.pdf.





Sara's* Story

Sara is a young Aboriginal woman who got in contact with a Salvation Army refuge after being evicted from her family's home. Sara came to the refuge with her toddler and was pregnant with her second child. She expressed high levels of distress and has an intellectual disability associated with a background of fetal alcohol syndrome.

During intake discussions Sara advised that her parent was using violence. Sara is frequently screamed at, called stupid and threatened, and fled her home after her parent threatened to kill her. The person using violence lives locally and is aware of the refuge location, frequently contacting Sara and asking her to return home. Sara feels hope for the family to be reunited, often choosing to return home after her parent's constant pleading, but these visits result in Sara being assaulted and 'kicked out' once again and returning to the refuge.

Sara has few options for living independently in the local community, with government housing having up to a five-year wait for those on the priority list in the region and private rentals being unaffordable for someone on disability support payments. Sara does not want to continue living in the refuge, repeatedly returning to the family home and experiencing violence. Case workers hold concerns that Sara is becoming institutionalised and that this pattern of violence will continue to escalate while she waits for housing.

*Name changed

Investing in interventions for persons using violence

- 2.44 To break cycles of violence there must be investment into interventions for persons who use violence that are community owned, have a focus on healing, fulfil the cultural needs of participants, adopt a holistic approach,¹⁵ and take into consideration the impact of colonisation and intergenerational trauma. It is equally important to acknowledge cultural practices and principles within these programs. This includes, for example, respecting that addressing violent behaviours can be deemed men's business and the confidentiality that comes with that.
- 2.45 No single program will meet the needs of all persons using violence. A suite of programs and responses, that are not limited by time or jurisdiction, must be made available to persons using violence to ensure long-term outcomes. Programs should work in partnership with local specialist family violence services who can support victim-survivors, and this should occur even when men's business is addressed separately.

¹⁵ Andrews, S., Gallanet, D., & Harrison, W. (2021). Holistic program developments and responses to Aboriginal men and who use violence against women. *International Social Work*, 64(1), 59-73. <https://journals.sagepub.com/doi/10.1177/0020872818807272>.





- 2.46 In our experience, Aboriginal and Torres Strait Islander victim-survivors often don't want to get persons using violence 'in trouble' or removed from their Country or kinship network through reporting violence. We stress the need for culturally appropriate and responsive services to support persons using violence to make change, whilst also maintaining a connection to Country and kinship. Services that address comorbidities, such as alcohol and other drug use and mental ill-health, should also be available to support sustainable change.
- 2.47 We reiterate that interventions should be community-led and designed. The Salvation Army points to the work of Tangentyere Council's family violence prevention program and Codes 4 Life men's program as examples of best practice. Both these programs are community driven and adopt a culturally safe approach to keeping women and their children safe while holding men accountable for their use of violence.

Recommendation 9

- 2.48 The Salvation Army recommends that the Family Safety Plan highlights the need to invest in community driven, sustainable, and culturally informed intervention programs for Aboriginal and Torres Strait Islander persons who use violence.**

Data collection and outcomes measurement

- 2.49 Culturally safe and appropriate outcomes measurement processes, including data collection, are critical to consider when working with Aboriginal and Torres Strait Islander peoples. To truly generate a culturally safe and appropriate outcomes measurement approach, Aboriginal and Torres Strait Islander people should be involved in each aspect of development, embedding co-design principles, and where possible, ensuring the process is Aboriginal and Torres Strait Islander-led. This takes time – to build relationships, establish knowledge exchange between Aboriginal and Torres Strait Islander people and evaluators, and identification and reduction of decolonising principles (for example, evaluators engaging in critical reflexivity and considering and reducing power dynamics). This is further compounded by the need to diverge from mainstream outcomes measurement methods and the limited availability of validated outcomes measurement tools suitable for Aboriginal and Torres Strait Islander people within the family and domestic violence sector.
- 2.50 The Family Safety Plan should include a specific commitment to support the development of a data and evidence eco-system that is led by Aboriginal and Torres Strait Islander researchers and communities. Where this is not possible, at a minimum, Aboriginal and Torres Strait Islander representatives should be involved in each aspect of development. The Salvation Army's Research and Outcomes Measurement team works on evaluation projects with a range of Salvation Army services. These services operate in rural, regional and metropolitan areas and serve a broad range of clients and communities, including Aboriginal and Torres Strait Islander people. This section draws on the experience and expertise of The Salvation Army's Research and Outcomes Measurement team.





- 2.51 Both community-level data and national prevalence surveys will improve our nation's understanding of the prevalence and extent of family and domestic violence in Aboriginal Torres Strait Islander communities and how this violence differentiates in local contexts. This must be informed by sound understanding of what data collection methods would be culturally safe and appropriate. It is important that potential survey participants know how their information will be used and importantly, not used. People with previous negative experiences with government may choose not to participate for fear of the information being used to harm or punish their community.
- 2.52 The Commonwealth Government should facilitate yarns with Aboriginal and Torres Strait Islander communities across the nation to capture both individuals' and communities' experiences. This would allow communities to have a say about the issues, solutions and barriers for support related to family and domestic violence in their area. It also provides the opportunity for Aboriginal and Torres Strait Islander people to yarn about what data would capture the information that is important to them.

Strengthening Aboriginal and Torres Strait Islander research

- 2.53 In working to collect culturally informed data and evidence the government needs to consult with Aboriginal and Torres Strait Islander research organisations, and other Aboriginal and Torres Strait Islander-led community organisations to understand the barriers for their community to participate in and deliver research, evaluation, and outcomes measurement. Consultation should also establish what resources are needed to train and support local Aboriginal and Torres Strait Islander services to design and deliver research, evaluation, and outcomes measurement.
- 2.54 Any projects need to be resourced to include community consultation with local Aboriginal and Torres Strait Islander people, where they can provide feedback about the research, evaluation, and outcomes measurement purposes, design, and how the findings would benefit their community. Such projects usually require longer timelines for design and implementation to incorporate consultation findings. While this process could increase a project's timeframe significantly it is still crucial to build trust, relationships, and encourage local Aboriginal and Torres Strait Islander people to participate. It is also important to recruit Aboriginal and Torres Strait Islander people in the project team either as researchers and evaluators or members of the advisory or steering committee.
- 2.55 Funding of projects should also account for additional resources to train local Aboriginal and Torres Strait Islander people to collect information from their own community wherever possible and appropriate. Resources will also be required to translate or adapt the research, evaluation and outcomes measurement materials to be accessible and culturally appropriate for Aboriginal and Torres Strait Islander people that participate in the project.



Using local, culturally informed evidence to develop solutions

2.56 The Salvation Army's Research and Outcomes Measurement team has identified the following learnings from their work in conducting research, evaluation, and outcomes measurement with Aboriginal and Torres Strait Islander people and using that evidence to inform decisions:

- Prioritising the voices of Aboriginal and Torres Strait Islander victim-survivors. All victim-survivors will have different experiences and perspectives. Placing the perspectives and knowledge of Aboriginal and Torres Strait Islander people at the centre is key to improving the quality and usefulness of the evaluation and the data strategy. This means upholding Aboriginal and Torres Strait Islander voices as equal to, or more important than, other evidence in this space (for example, within established literature).
- Working with Aboriginal and Torres Strait Islander communities requires priority to be placed on relationship building and cultural safety, and this may look different within different communities. This includes regular, critical reflection on the part of the evaluator. This should also include consideration of power dynamics, self-determination, reciprocity, and shared decision-making.
- Aboriginal and Torres Strait Islander people are the most researched community globally¹⁶ and there is significant risk of re-victimisation. Careful consideration should be given to the data collection processes, which should ideally be in person, informal and genuine – with support from Elders or other community advocates or known supports. This requires planning and consultation – significant time should be set aside for this to occur.
- Engagement and remuneration should not be tokenistic. It is important to consider the reciprocal nature of the engagement and not to make assumptions regarding what would be of benefit to Aboriginal and Torres Strait Islander communities.
- It is important to carefully consider how any research or outcomes measurement aligns with the National Health and Medical Research Council guidelines for research with Aboriginal and Torres Strait Islander peoples¹⁷ and any other established guidelines of relevance.

Recommendation 10

2.57 The Salvation Army recommends that the Family Safety Plan highlights the need for the development of a data and evidence eco-system that is led by Aboriginal and Torres Strait Islander researchers and communities.

¹⁶ National Health and Medical Research Council. (2018). *Ethical guidelines for research with Aboriginal and Torres Strait Islander peoples*. <https://www.nhmrc.gov.au/research-policy/ethics/ethical-guidelines-research-aboriginal-and-torres-strait-islanderpeoples#:~:text=Aboriginal%20and%20Torres%20Strait%20Islander%20Peoples%20are%20considered%20to%20be,received%20very%20little%20perceivable%20benefit.>

¹⁷ Ibid.



3 Supporting children and young people

- 3.1 The Salvation Army believes that children and young people need to be recognised and treated as victim-survivors in their own right, as opposed to dependents of a parent who is a victim-survivor.
- 3.2 Aboriginal and Torres Strait Islander children face additional disadvantages in comparison to their non-Indigenous counterparts, including intergenerational trauma, the breakdown of the kinship system, racism, and socio-economic disadvantage. These additional barriers have led to their over-representation as victim-survivors of family and domestic violence, and within the youth justice system.¹⁸
- 3.3 We draw attention to the following areas as critical to ensuring that Aboriginal and Torres Strait Islander children and young people impacted by family and domestic violence are supported where, when, and how they need it.

Specialised services for children and young people

- 3.4 Current access to specialist services for children and young people who are victim-survivors of family and domestic violence, or who choose to use violence, is limited or difficult to access across Australia.
- 3.5 In our experience, funding for this cohort is limited and short term, and there is a significant gap particularly for young people aged 16 and over with an experience of family and domestic violence. This is deeply problematic considering that a lack of appropriate and timely intervention can result in long-term impacts.¹⁹ Family and domestic violence can have lifelong harms for children and those around them. This can include psychological and behavioural impacts, health and socioeconomic impacts, and increased risk of intergenerational violence and re-victimisation.²⁰
- 3.6 For Aboriginal and Torres Strait Islander children there is a double conundrum. Firstly, the family and domestic violence sector is currently not equipped to respond to the needs of children as victim-survivors in their own right. When there are child specific resources, they are often not culturally appropriate for Aboriginal and Torres Strait Islander children. Secondly, there are few culturally appropriate family and domestic violence services available to Aboriginal and Torres Strait Islander people, and those that do exist primarily focus on adults and not on the specific needs of children and young people.²¹

¹⁸ Melbourne City Mission. (2021). *Amplify Research Report*. https://www.mcm.org.au/-/media/mcm/content-repository-files/amplify_turning-up-the-volume-on-young-people-and-family-violence.pdf.

¹⁹ Victims of Crime Commissioner. (2023). *Victims' Charter Guidelines*. <https://victimsofcrimecommissioner.vic.gov.au/media/buzlgioh/vocc-victims-charter-guidelines.pdf>.

²⁰ Richards, K. (2011). Children's exposure to domestic violence in Australia. *Trends & issues in crime and criminal justice*. No. 419. Canberra: Australian Institute of Criminology. <https://www.aic.gov.au/publications/tandi/tandi419>.

²¹ Australian National Research Organisation for Women's Safety. (2022). *New Ways for our Families: Designing an Aboriginal and Torres Strait Islander cultural practice framework and system responses to address the impacts of domestic and family violence on*



- 3.7 The most effective way to listen to the voices of children is by funding a specialist family and domestic violence response for Aboriginal and Torres Strait Islander children and young people. Any response must be culturally and developmentally appropriate, trauma-informed, and informed by the long-term impacts of family and domestic violence. These services either do not exist or when they do, are not culturally appropriate and have very long waiting lists.
- 3.8 We need to ensure children and young people have timely access to case management and responses that are culturally appropriate and address age-appropriate attitudes toward gender and violence. For women’s services to effectively respond, risk assessment, and safety planning must acknowledge the child as a victim-survivor in their own right and understand the trauma they experience. This would be especially effective for counselling and critical outreach services.
- 3.9 We highlight the need for a specialist response to:
- **Emphasise and invest in programs and initiatives** developed and facilitated by Aboriginal and Torres Strait Islander communities, for their children and young people. We reiterate the importance of consulting with Aboriginal and Torres Strait Islander victim-survivors and community-led organisations, and ensuring these organisations can lead responses within their communities.
 - **Bolster collaboration** between the family and domestic violence sector and youth specific organisations and services to ensure that support is available for children and young people where, when, and how they need it. We suggest the need to leverage existing youth infrastructure and reinforce this with the knowledge of the family and domestic violence sector and specialists. The Salvation Army has adopted this approach through self-funded initiatives. For example, The Salvation Army is funding family and domestic violence specialists embedded within our youth programs and services to engage and support children and young people within existing contexts. An example of this is our Sunshine Youth Hub in Victoria as outlined below.
- 3.10 Initiatives that create opportunities for meaningful engagement with children and young people, while fostering connections to culture and community, should be a funding priority.

Recommendation 11

- 3.11 **The Salvation Army recommends that the Family Safety Plan highlights the need to invest in a specialist family and domestic violence response developed specifically for Aboriginal and Torres Strait Islander children and young people impacted by family and domestic violence.**



The Sunshine Youth Hub

The Salvation Army's Sunshine Youth Hub (the Hub) operates as a high-volume first point of call for young people experiencing homelessness in western metropolitan Melbourne.

A significant proportion of young people who attend the Hub for support identify family breakdown as the primary reason for homelessness. In response to this, our family and domestic violence and youth streams partnered to introduce a family and domestic violence partnership role at the Hub to better understand the impact of family breakdown on young people and to assist support staff to identify alternate safe housing pathways out of homelessness and crisis service responses.

The Senior Specialist Youth Family and Domestic Violence Practitioner provides important practice support to the Hub's staff across a range of priority areas, including:

- Assisting entry point staff to understand the impact of family breakdown and its causes, seek family focused approaches where safe and appropriate, and to divert young people away from homelessness; and
- Assisting support staff with complex case consultation and safety planning, including providing detailed Multi-Agency Risk Assessment and Management Framework (MARAM) assessments, and triaging to specialist family and domestic violence service responses.

The Senior Specialist Youth Family and Domestic Violence Practitioner works within a trauma-informed practice environment, and works creatively to ensure the safety of, and meet the support needs of, young people accessing the Hub. The role is, and will continue to be, instrumental in delivering high-quality, safe and effective family and domestic violence and child wellbeing responses to youth seeking support, safety, and recovery.

Addressing adolescent violence in the home

3.12 The Salvation Army believes it is critical to focus attention on adolescent violence in the home (AVITH) to best support people using, or at risk of using, violence to get help early. AVITH is a term that describes a pattern of violent behaviour used by a young person within their family, and may include property damage, financial, psychological, physical, and sexual forms of violence.²²

²² 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.





- 3.13 Victorian data has shown that 80 per cent of young people with initial police interventions for AVITH go on to have future contact with justice systems.²³ Over half of these young people have future contact with the justice system as a victim of crime, a victim-survivor of family and domestic violence, or as a complainant on a family and domestic violence intervention order.²⁴
- 3.14 AVITH research has pointed to an acute need for early intervention for families and young people that takes the form of wraparound collaborative responses.²⁵ AVITH needs to be met with responses that are trauma-informed, address barriers to engagement, are flexible and tailored according to the individual needs of young people and their families, and are intersectional and culturally safe.²⁶ We believe that AVITH interventions need to be completely external and prior to involvement with other intervention systems, such as youth justice or child protection services.
- 3.15 We urge the need to utilise cultural strengths when engaging with young people at risk of using violence who are from Aboriginal and Torres Strait Islander or culturally and linguistically diverse communities. Emphasis should be placed, and investment focused, on programs and initiatives developed and facilitated by these communities, for their communities.

Recommendation 12

- 3.16 The Salvation Army recommends that the Family Safety Plan highlights the importance of investing in early intervention efforts to support children and young people using, or at risk of using, violence in the home. Interventions must be holistic, work with the whole family, and be culturally appropriate.**

[Preventing over-reporting to child protection agencies](#)

- 3.17 The Salvation Army holds concerns that statutory child protection reporting mechanisms and processes are causing more harm to victim-survivors accessing supports. We draw attention particularly to Aboriginal and Torres Strait Islander victim-survivors where a significant barrier to engagement with support is fear of child protection responses.²⁷
- 3.18 Frontline services are often put in situations where mandatory reporting is required, even when families are engaging effectively with appropriate services and supports. We are concerned that this can lead to over-reporting and poses a risk to victim-survivors engaging with services.

²³ Crime Statistics Agency. (2022). *Adolescent family violence in Victoria*. <https://www.crimestatistics.vic.gov.au/research-and-evaluation/publications/adolescent-family-violence-in-victoria>.

²⁴ Ibid.

²⁵ Campbell, E., Ellard, R., Hew, E., Simpson, S., McCann, B. & Meyer, S. (2023). *WRAP around families experiencing AVITH: Towards a collaborative service response* (Research report, 04/2023). ANROWS.

²⁶ Ibid.

²⁷ Australian National Research Organisation for Women's Safety. (2020). *Improving family violence legal and support services for Aboriginal and Torres Strait Islander Peoples: Key findings and future directions*. (Research to policy and practice, 25-26/2020). Sydney: ANROWS.



4 Ensuring services understand their responsibilities under the Family Safety Plan

- 4.1 To ensure successful implementation and coordinated, effective, and culturally appropriate interventions, all services must be fully aware of their roles and responsibilities under the Family Safety Plan and National Agreement.
- 4.2 Our services have highlighted that it is unclear how the Family Safety Plan will align and interact with other existing policies and plans. We fear that this will impact on the Family Safety Plan's success. For example, the Family Safety Plan provides the framework for governments to implement, in order to achieve Target 13 of the National Agreement which aims to reduce family violence against Aboriginal and Torres Strait Islander women and children by at least 50% by 2032, as progressing towards zero.³³ This is a different goal to the Aboriginal and Torres Strait Islander Action Plan 2023-2025 under the National Plan to End Violence against Women and Children, which aims to end violence against women in one generation.³⁴
- 4.3 We are concerned that a lack of clarity regarding how the goals and priorities of the Family Safety Plan align with other plans related to ending violence against Aboriginal and Torres Strait Islander people, will result in fragmented responses, or inaction. We emphasise the need for clarity regarding the alignment of the goals and priorities of the Family Safety Plan with the National Plan to End Violence against Women and Children. We believe this will ensure all services and organisations understand the significant role they play in promoting best outcomes for Aboriginal and Torres Strait Islander families impacted by family and domestic violence.
- 4.4 We also highlight the critical need for alignment of funding commitments, and transparency around how funding under the Family Safety Plan will be assessed and distributed according to the needs of communities.

Recommendation 14

- 4.5 **The Salvation Army recommends the need for clarity regarding how the Family Safety Plan will interact and align with the National Plan to End Violence against Women and Children.**

³³ SNAICC. (2024). *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Family Safety Plan Engagement Public Submissions Discussion Paper*. <https://www.snaicc.org.au/wp-content/uploads/2024/09/Discussion-Paper-FSP-2.pdf>.

³⁴ Commonwealth of Australia Department of Social Services. (2022). *National Plan to End Violence against Women and Children 2022-2032*. https://www.dss.gov.au/sites/default/files/documents/10_2023/national-plan-end-violence-against-women-and-children-2022-2032.pdf.



5 Conclusion

- 5.1 The Salvation Army thanks SNAICC for the opportunity to provide a written submission to the Family Safety Plan.
- 5.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

October 2024

