

Committee Secretariat

Senate Finance and Public Administration Committees

Parliament House, Canberra

via online form

6 October 2017

Submission on Delivery of National Outcome 4 of the National Plan to Reduce Violence Against Women and Their Children (1800RESPECT)

Thank-you for the opportunity to make a submission to the Committee's inquiry.

Australian Women Against Violence Alliance (AWAVA) is one of the six National Women's Alliances funded by the Australian Government to bring together women's organisations and individuals across Australia to share information, identify issues and contribute to solutions. AWAVA's focus is on responding to and preventing violence against women and their children. AWAVA's role is to ensure that women's voices and particularly marginalised women's voices are heard by Government, and to amplify the work of its member organisations and Friends and Supporters. AWAVA's members include organisations from every state and territory in Australia, representing domestic and family violence services, sexual assault services, and women's legal services, as well as organisations representing Aboriginal and Torres Strait Islander women, young women, women educators, women in the sex industry and other groups.

General comments

AWAVA believes that the 1800RESPECT service is a crucial and central part of the national commitment to addressing violence against women under the National Plan. 1800RESPECT provides a service to people who may be unable to access specialist women's services supporting victims/survivors, or who may be unaware of pathways into these services. The high public profile of 1800RESPECT is also an important symbol of the national government's commitment to assisting and standing with victims/survivors and against the perpetration of violence against women and their children. For these reasons, AWAVA is committed to supporting 1800RESPECT as a service and helping to ensure it provides high-quality counselling and referral.

Underlying the challenges and recent controversy regarding the provision of 1800RESPECT counselling services are two broader sets of issues.

First, 1800RESPECT relies on and interacts with a specialist women's services sector that is at the forefront of ending violence against women. This service sector is underpinned by principles that are supported by international research and evidence-based practice: a rights-based approach; a client-centred approach; perpetrator accountability; women's safety as central; accessible, culturally-appropriate and sensitive services; and advancing gender equality and women's empowerment.ⁱ

However, this non-government service sector is critically under-funded and is facing ever-increasing demand on its capacity, partly as a result of the high profile now being given to violence against women and the reasonable expectation that victims/survivors have as a result of being able to obtain support.

This means that there is a great deal of responsibility on 1800RESPECT as a high-profile 'flagship' of the National Plan to be able to both provide a high-quality counselling and referral service (in a context where it as well as other services are stretched to capacity) and to interact ethically and effectively with the rest of the service sector.

Second, the non-government women's services sector continues to struggle with contracting and institutional arrangements that undermine rather than strengthen its central role within the broader multi-sectoral provision of essential services to women subject to violence.ⁱⁱ In this respect it is worth noting the UN Women guidelines on responding to violence against women:

Where possible, specialist crisis services responding to victims/survivors of violence against women should be run by independent and experienced women's non-governmental organizations providing gender-specific, empowering and comprehensive support to women survivors of violence, based on feminist principles.ⁱⁱⁱ

Across all jurisdictions in Australia, there is a need for service and funding systems to adopt this approach as part of an explicit commitment to supporting and strengthening the independent, not-for-profit women's services sector. The Victorian Royal Commission into Family Violence and the Victorian Government's response to its report are a good example of how specialist women's services can begin to be supported and strengthened within a broader and evolving multi-sectoral approach.

From this perspective, there are difficulties involved in the current model of having a large generalist for-profit (Medibank Health Solutions) operate 1800RESPECT, with a portion of its work contracted to not-for-profit specialist women's services. These issues are centred on resourcing, service quality, governance and communication, as outlined in more detail below.

Note: This submission does not comment on each of the issues mentioned in the terms of reference, as some matters are beyond our knowledge or expertise. Instead, it is structured in terms of the key issues that AWAVA has been addressing in its communication with our members and with Medibank Health Services.

Service adequacy, quality and funding (Terms of Reference a, d & e)

A key question surrounding the shift to a triage model and subsequent developments has been whether the funding provided to operate 1800RESPECT is adequate in light of the standard of service required and the resources needed to provide that standard. This question has not been addressed systematically, and responsibility for doing so sits with the Australian Government as the funding body.

Sustainable and adequate funding will ensure that subcontracted service providers have the capacity to undertake continuous professional development and training as well as are sufficiently resourced to address vicarious trauma of frontline workers.

AWAVA has confidence in Safe Steps, DV Connect and Women's Safety Services SA as experienced service providers who will deliver sound trauma counselling. However, further assurances are needed to be sure that the triage (First Response) model is ensuring adequate levels of service for callers.

Because of the nature of counselling and referral in the area of domestic, family and sexual violence, it is challenging to achieve sound evaluation of services from the perspective of client experiences and outcomes. However, more can be done to work collaboratively with the women's services sector and researchers to explore models of evaluation that are being developed. ANROWS' Advocacy for Safety and Empowerment project also includes useful approaches.^{iv} Improved service evaluation will contribute to the great retention of clients throughout the referral process.

In the immediate term, there are several steps that AWAVA has suggested that 1800RESPECT could take as ways to enable the public at large, and particularly advocates and women's services, to have a better assurance of service quality:

- Share information with stakeholders about how call responders (triage responders) make decisions about referrals.
- Share information about the proportion of calls that are going to different referral pathways (trauma counselling; state-based help lines; online resources; others). AWAVA has been assured that call responders are not subject to any quotas in terms of the proportion of calls that are to go to the different pathways.
- Share information with stakeholders about how victims/survivors' safety and confidentiality will be protected, for example through making available some form of the service's policies and procedures in relation to responding to subpoenas.
- Share information about procedures for accessing files within MHS (AWAVA has been assured that there is no access for other MHS staff and that there are strict controls on who can access files).
- Assure stakeholders that files and recordings will be stored in accordance with national legislation e.g. Privacy Act, and not on overseas servers. AWAVA has been assured of this in communication with MHS.
- Undertake further consultation with specialist women's services, including but not limited to the three NGO panel providers, to review and if necessary alter the process for obtaining consent or providing opt-in / opt-out for call recording and collection of other potentially safety-compromising details.
- As specialist women's services deal often with privacy / safety issues including subpoenas, 1800RESPECT could learn from these existing services. The three NGO helpline panel providers will be helpful in this regard.
- When developing evaluation / quality assurance processes, seek advice from and listen to victims/survivors and their representative groups, and address service accessibility and appropriateness for marginalised groups of people including but not limited to Aboriginal and Torres Strait Islander women, women subjected to racism on the basis of their cultural or linguistic background, women with disability, women living in poverty and/or with mental illness, women in prison and leaving prison, women from an asylum seeking / refugee background, people who identify as LGBTIQ, women in regional, rural and remote areas, older women and younger women.

Contracting and the for-profit / not-for-profit basis of service provision (Terms of Reference b)

As outlined above, the not-for-profit women's services sector remains central to driving good practice responses to violence against women, but this sector remains under-resourced, with its service models not properly supported by policy frameworks and funding systems. The widespread emphasis on competition and favouring larger providers undermines diversity, as recently evidenced by the Going Home, Staying Home (GSHS) reforms in NSW, which resulted in the loss of many small, specialised providers.^v This is particularly concerning for the women's sector, where services are often

delivered by small-scale, local organisations. As AWAVA has previously emphasised, policies that sideline women-specific services in favour of generalist agencies are counterproductive.^{vi} In relation to processes such as GSH, such policies lead to long standing connections and partnerships built over many years being damaged or destroyed, with the consequence that women and their families have been stranded without access to safety and the specialist best practice supports delivered by a competent and knowledgeable service.

In this context, it is understandable that many stakeholders are deeply concerned by a situation in which a large, for-profit, generalist health company is responsible for delivery of a service as important as 1800RESPECT. AWAVA acknowledges that MHS offers large-scale infrastructure in terms of telephony and workforce planning, and that it may be difficult for NGO women's services to deliver the same scale of support for 1800RESPECT operations. From this perspective, having three specialist NGO state-based helplines working alongside MHS clearly has benefits.

In general, AWAVA urges MHS and the Australian Government to work towards building capacity in the not-for-profit women's services sector, so that delivery of important services such as 1800RESPECT can occur wholly through this sector, which already holds the substantive expertise in service delivery.

We understand from MHS that it is not in a position to provide stakeholders with information about any profit generated from the 1800RESPECT contract, and or about how these amounts would be determined. We understand that MHS's position is that regardless of any profit-taking, service quality is not compromised and is considered as important above all else.

However, AWAVA together with many others remains concerned about the possibility of government funding going to shareholders as profit instead of being devoted to expanding and/or improving services – particularly in the context of demand outstripping capacity to assist all who need support, to the full extent of their need.

We urge the Australian Government and MHS to ensure that all decisions about resource allocation be made in line with the good practice principles outlined above. These principles represent best practice in the delivery of services to victims/survivors of sexual assault and domestic and family violence, and should inform all work in the area.

Confidence, information-sharing and relationships (Terms of Reference f)

While 1800RESPECT is making an effort to engage better with the women's services sector, and while the new panel arrangement may help in this regard, further work is required to strengthen confidence in the service.

Information-sharing and where possible further collaboration and consultation are required, and this work needs to be pursued with genuine commitment to bringing organisations and sectors together and honestly evaluating the situation. The Australian Government and particularly the Department of Social Services has a role in supporting collaboration, accountability and information sharing among the National Plan partners and non-government service and advocacy stakeholders including but not limited to AWAVA.

We appreciate the fact that AWAVA has been able to direct questions to MHS and share information as a result with our membership.

If you would like to discuss the contents of the AWAVA submission further, please contact Merrindah Andrew, AWAVA Program Manager, using the details below.

Merrindah Andrew

Program Manager

Australian Women Against Violence Alliance

www.awava.org.au | pm@awava.org.au | ph: 0428 541 396

ⁱ AWAVA (2016) The role of specialist women's services in Australia's response to violence against women and their children: Policy Brief, <http://awava.org.au/2016/04/07/research/role-specialist-womens-services-australias-response-violence-women-children>

ⁱⁱ UN Women (2015) Essential Services Package for Women and Girls Subject to Violence, http://www.unfpa.org/sites/default/files/pub-pdf/Essential_Services_Package_for_Women_and_Girls_Subject_to_Violence.pdf

ⁱⁱⁱ UN Women (2012) Handbook for National Action Plans on Violence against Women <http://www.unwomen.org/en/digital-library/publications/2012/7/handbook-for-national-action-plans-on-violence-against-women> p. 44.

^{iv} <https://anrows.org.au/advocacy-for-safety-and-empowerment-good-practice-and-innovative-approaches-aboriginal-women>

^v Homelessness NSW, Submission to Productivity Commission Inquiry Human Services, Sydney, 2016, p.3

^{vi} AWAVA (2016) The role of specialist women's services in Australia's response to violence against women and their children: Policy Brief, <http://awava.org.au/2016/04/07/research/role-specialist-womens-services-australias-response-violence-women-children>