



Aboriginal Family Violence Prevention  
& Legal Service Victoria  
**Standing Firm Against Family Violence**

# **FVPLS Victoria**

## **Submission to the Victorian Government**

### ***Access to Justice Review***

***29/02/2016***

## Table of Contents

<b>1</b>	<b>Introduction.....</b>	<b>3</b>
<b>2</b>	<b>Executive Summary.....</b>	<b>3</b>
<b>3</b>	<b>Recommendations.....</b>	<b>5</b>
<b>4</b>	<b>Impacts of family violence on Aboriginal women.....</b>	<b>6</b>
<b>5</b>	<b>Barriers to justice for Aboriginal women .....</b>	<b>8</b>
	<i>(a) Police responses .....</i>	<i>9</i>
	<i>(b) FVPLS Victoria Prisoner Support Program.....</i>	<i>10</i>
<b>6</b>	<b>Term of Reference 1: The Availability of Legal Information .....</b>	<b>11</b>
	<i>(a) Community legal education and early intervention and prevention work .....</i>	<i>11</i>
	<i>(b) Provision of legal information through legal work .....</i>	<i>14</i>
	<i>(c) The need for multiple entry points to the legal system.....</i>	<i>15</i>
	<i>(d) Aboriginal Liaison Officers .....</i>	<i>16</i>
<b>7</b>	<b>Term of Reference 2: Diverting People from Civil Litigation .....</b>	<b>16</b>
<b>8</b>	<b>Term of Reference 6: Funding .....</b>	<b>17</b>
<b>9</b>	<b>Term of Reference 7: Duplication of Services .....</b>	<b>18</b>
	<i>(a) Distinct role for Aboriginal community controlled organisations. ....</i>	<i>18</i>
	<i>(b) Relationship building.....</i>	<i>19</i>
	<i>(c) Cultural safety.....</i>	<i>20</i>
	<i>(d) Culturally safe access across metropolitan and regional Victoria .....</i>	<i>21</i>
<b>10</b>	<b>Term of Reference 9: Self-represented Litigants.....</b>	<b>21</b>
<b>11</b>	<b>Conclusion .....</b>	<b>23</b>
	<b>Appendix 1: FVPLS Victoria .....</b>	<b>24</b>
	<b>Appendix 2: Other relevant FVPLS Victoria Submissions.....</b>	<b>24</b>
	<b>Appendix 3: Endorsement by Women’s Health Victoria (WHV) .....</b>	<b>25</b>

## **1 Introduction**

1. The Aboriginal Family Violence Prevention and Legal Service Victoria ('FVPLS Victoria') welcomes the opportunity to make a submission to the Victorian Access to Justice Review.
2. FVPLS Victoria is an Aboriginal Community Controlled, not-for-profit legal assistance provider. Established in 2002, FVPLS Victoria is the only legal assistance service in Victoria exclusively dedicated to assisting Aboriginal victims/survivors of family violence and sexual assault. See Appendix 1 for more detail on FVPLS Victoria.
3. FVPLS Victoria works to address the immediate legal need of our clients, build trust and confidence between the Aboriginal community and our service as well as with the main contact points within the Victorian justice system, including police, DHHS, the courts and legal service providers generally. As such, FVPLS Victoria has significant expertise to inform this inquiry.
4. This submission respond to terms of reference 1, 2, 6, 7 and 9. FVPLS Victoria also details the significant access to justice barriers facing Aboriginal women.
5. FVPLS Victorian welcomes the endorsement by Women's Health Victoria (WHV), included in Appendix 3, and look forward to further collaboration around improving outcomes and access to services for Aboriginal women.
6. FVPLS Victoria is eager to continue building our relationship with the Victorian Government to bring about improved justice outcomes for Aboriginal women and we welcome the opportunity to present our submission.

## **2 Executive Summary**

7. The legacy and impact of Australia's colonial history, including oppression through legal policies of forced assimilation has had deep and far reaching consequences for Aboriginal communities.
8. The consequences have translated into profound levels of mistrust of the legal system by large portions of Aboriginal people resulting in further entrenchment of disadvantage and dispossession in Aboriginal communities.
9. FVPLS Victoria assists Aboriginal victims/survivors of family violence and sexual assault including women, men and children. However, 93% of our clients are Aboriginal women. Nationally, Aboriginal women are 34.2 times

more likely to be hospitalised from family violence<sup>1</sup> and 10 times more likely to be killed in a violent assault.<sup>2</sup>

10. The long term generational impact of Aboriginal women's disadvantage is visible through the over-representation of Aboriginal children in the child protection system. The perpetuation of poor life outcomes for Aboriginal communities has resulted in transgenerational trauma leading to poor justice outcomes for Aboriginal women and their children.
11. The cost of this trauma is not just limited to the Aboriginal community; KPMG estimates that violence against Aboriginal women will cost the Australian economy \$2.2 billion by 2021.<sup>3</sup>
12. For Aboriginal women, there are significant barriers preventing access to the Victorian justice system. These barriers are entrenched and long-standing. Barriers include a lack of rights awareness and services, poor police practices, stigma due to criminalisation, poverty and the lack of access to culturally appropriate services.
13. There is also a significant lack of data to rely upon in relation to Aboriginal women and their experiences of the justice system which needs to be addressed.
14. Aboriginal women's access to justice is impacted by funding uncertainty which curtails the delivery of Aboriginal culturally safe early intervention, prevention and community education programs. The lack of early engagement with legal support often results in more negative outcomes for Aboriginal women.
15. Ongoing, sustainable funding is urgently required for programs which critically interrupt trajectories towards the criminal justice system and assist Aboriginal women in identifying alternative pathways.
16. There is a need to further embed cultural awareness within the mainstream legal system to respond to Aboriginal women, however, funding for specialised culturally safe legal services for Aboriginal women is imperative.
17. Victims of family violence require a specialised service that is culturally safe and will only act on behalf of victim/survivors.

---

<sup>1</sup> The Australian Productivity Commission, *Overcoming Indigenous Disadvantage - Key Indicators 2014*, 2014, 4.93 table 4A.11.22 available at: <http://www.pc.gov.au/research/recurring/overcoming-indigenous-disadvantage/key-indicators-2014/key-indicators-2014-report.pdf>.

<sup>2</sup> Australian Institute of Health and Welfare, *Family Violence among Aboriginal and Torres Strait Islander people*, 2006, pp 66 available at: <http://www.aihw.gov.au/publication-detail?id=6442467912>

<sup>3</sup> KPMG, *Cost of violence against women and their children*, the Department of Families, Housing, Community Service and Indigenous Affairs, 2009 pp 9, available at <https://www.dss.gov.au/our-responsibilities/women/publications-articles/reducing-violence/national-plan-to-reduce-violence-against-women-and-their-children/economic-cost-of-violence-against-women-and-their-children?HTML>

### 3 Recommendations

18. FVPLS Victoria makes the following recommendations

**Recommendation 1:** That the Victorian Government undertake a comprehensive inquiry into the barriers faced by Aboriginal women in accessing services, including addressing the intersectionality of disadvantage.

**Recommendation 2:** That the Victorian Government provide ongoing funding to enable the FVPLS Victoria Prison Support Worker role to continue beyond June 2016 to assist vulnerable and marginalised Aboriginal women in prison to have equal access to justice.

**Recommendation 3:** That the Victorian Government ensures sustainable ongoing funding for FVPLS Victoria's CLE/EIP Programs including *Sisters Day Out*, *Dilly Bag*, *Dilly Bag: The Journey* and *Young Luv*.

**Recommendation 4:** The development of a model by the Victorian Government to assist Victorians better access justice should be undertaken in partnership with FVPLS Victoria to prevent further marginalisation of Aboriginal women.

**Recommendation 5:** That the Victorian Courts employ Aboriginal Liaison Officers as an important route through which Aboriginal engagement with the legal system can be facilitated.

**Recommendation 6:** That the Victorian Government implement a mandated and enforceable process for ensuring FVPLS Victoria is notified when an Aboriginal client comes into contact with child protection authorities. FVPLS Victoria should be resourced accordingly.

**Recommendation 7:** That the Victorian Government work with the Commonwealth to ensure that the legal assistance sector is funded to meet legal need. This is to be determined by a regular evidence-based assessment of need.

**Recommendation 8:** That the Victorian Government increasingly fund Aboriginal community controlled organisations separately to maintain and develop the specialised skills that are crucial for effective service delivery. The need for specialised and culturally safe services cannot be overstated given the highly distinct challenges faced by Aboriginal women.

**Recommendation 9:** That the Victorian Government ensures that all funding agreements with mainstream organisations stipulate a condition of cultural awareness training when they are awarded funding for work with the Victorian Aboriginal community.

**Recommendation 10:** That the Victorian Government investigate law reform avenues that would limit the potential for alleged perpetrators to self-represent in relation to family violence cases and invest more funding into duty lawyers.

## 4 Impacts of family violence on Aboriginal women

19. Underpinning our understanding of Aboriginal women's experience of family violence is the intersectionality of disadvantage faced by Aboriginal women. This intersectionality relates to the way in which racism, gender inequality, intergenerational trauma and poverty create poor justice outcomes for Aboriginal women.
20. This disadvantage is clearly reflected in the disproportionate rates of family violence against women. Aboriginal women and children in particular experience family violence at significantly higher levels than other Australians. As noted in the executive summary, nationally, Aboriginal women are 34.2 times more likely to be hospitalised from family violence<sup>4</sup> and 10 times more likely to be killed in a violent assault.<sup>5</sup>
21. As we reported to the Royal Commission into Family Violence, family violence has devastating impacts on Aboriginal women, children and communities as a whole. These impacts include
  - *Child protection* – Preliminary findings from Taskforce 1,000<sup>6</sup> show that of 250 child protection cases reviewed, men's violence against women was the primary driver in up to 95% of cases of Aboriginal children entering out-of-home care.<sup>7</sup>

Victoria's child removal rate is now increasing faster than any other State or Territory in Australia, with an increase of 98% of Aboriginal children removed from their families and placed in out of home between 2007-08 and 2013-14.<sup>8</sup>
  - *Homelessness* – Aboriginal women are 15 times more likely to seek assistance from crisis homelessness services than non-Aboriginal people. Aboriginal women make up 14% of all clients at specialist homelessness services.<sup>9</sup>
  - *Incarceration* – Aboriginal women now comprise the fastest growing segment of the Victorian prison population and are also more likely to

---

<sup>4</sup> The Australian Productivity Commission, above 1, 4.93 table 4A.11.22

<sup>5</sup> Australian Institute of Health and Welfare, above 2, pp 66

<sup>6</sup> Taskforce 1000 is a collaborative project between the Department of Health and Human Services (DHHS) and the Commission for Children and Young People to review the circumstances of 1000 Aboriginal children and young people in out-of-home care, available at <http://www.dhs.vic.gov.au/about-the-department/plans.-programs-and-projects/projects-and-initiatives/children,-youth-and-family-services/taskforce-1000>

<sup>7</sup> Aboriginal Family Violence Prevention & Legal Service Victoria, *Submission to the Victorian Royal Commission into Family Violence*, 2015, pp 16, available at

<http://fvpls.org/images/files/FVPLS%20Victoria%20submission%20to%20Royal%20Commission%20-%20FINAL%20-%202015Jul15.pdf>

<sup>8</sup> Productivity Commission, Report on Government Services: Volume F Community Services 2015, Table 15A.20 available at <http://www.pc.gov.au/research/recurring/report-on-governmentservices/2015/communityservices/child-protection/government-services-2015-volume-f-chapter15.pdf>

<sup>9</sup> Australian Institute of Health and Welfare, *Specialist Homelessness Services 2012-13, 2014*, pp 38 available at <http://www.aihw.gov.au/WorkArea/DownloadAsset.aspx?id=60129545638>

return to prison and more likely to be in prison on remand.<sup>10</sup> Around 80% of Aboriginal women in prison are mothers<sup>11</sup> and nearly 90% report having experienced family violence and sexual assault<sup>12</sup>.

For more detail see FVPLS Victoria's Submission to the Victorian Royal Commission into Family Violence.<sup>13</sup>

### **Systemic disadvantage: The incarceration of Aboriginal women**

One metric that reflects the systemic disadvantage faced by Aboriginal women is the growing incarceration rates of Aboriginal Australians.<sup>14</sup> This alarming rate is illustrated by the fact that between 2007 and 2012, the amount of Aboriginal women in prison doubled.<sup>15</sup> Family violence has a central connection to these rates of incarceration, with an overwhelming majority of Aboriginal women in prison having experienced family violence.<sup>16</sup> With respect to Aboriginal women in prison, FVPLS Victoria's experience working in Victorian Aboriginal communities for the last 12 years confirms a Victorian study of female prisoners which found 87% were victims of sexual, physical or emotional abuse, with most having suffered abuse in multiple forms.<sup>17</sup>

The Victorian Aboriginal Justice Agreement has also gone some way to identify the lack of prison diversion programs for Aboriginal women in Victoria.<sup>18</sup> In recent years the Aboriginal Justice Forum (AJF) has responded to rising incarceration rates of Aboriginal women and has seen the need for Aboriginal women's imprisonment to be a last resort. FVPLS Victoria has been a long standing member and advocates strongly on these issues at AJF. If funded properly, this work can have a long term impact on improving Aboriginal women's access to justice.<sup>19</sup>

---

<sup>10</sup> Victorian Equal Opportunity and Human Rights Commission, *Unfinished Business – Koori women and the justice system*, 2013, pp 16-17, available at <http://www.humanrightscommission.vic.gov.au/index.php/our-resources-and-publications/reports/item/679-unfinished-business-koori-women-and-the-justice-system>

<sup>11</sup> State of Victoria, Department of Justice, Koori Justice Unit, 'Koori Women's Diversion Project' (Presentation to Koori Women's Diversion Project Working Group meeting 3 July 2013) cited in Victorian Equal Opportunity and Human Rights Commission, *Unfinished Business – Koori women and the justice system*, 2013, pp 1, available at <http://www.humanrightscommission.vic.gov.au/index.php/our-resources-and-publications/reports/item/679-unfinished-business-koori-women-and-the-justice-system>

<sup>12</sup> Smart Justice, Factsheet: more prisons are not the answer to reducing crime, 2011, page 2 available at <http://www.smartjustice.org.au/resources/SJ%20Factsheet%20Prisons%202011.pdf>

<sup>13</sup> Aboriginal Family Violence Prevention & Legal Service Victoria, above 7, pp 15-21,

<sup>14</sup> Human Rights Law Centre, 'New Stats Reveal that Aboriginal and Torres Strait Islander Women are One of the Most Incarcerated Groups in the World', (Media Release, 16 September 2015) available at <http://hrlc.org.au/new-stats-reveal-that-aboriginal-and-torres-strait-islander-women-are-one-of-the-most-incarcerated-groups-in-the-world/>

<sup>15</sup> Victorian Equal Opportunity and Human Rights Commission, above 10, pp 19,

<sup>16</sup> Debbie Kilroy, 'The Over-Representation of Aboriginal and Torres Strait Islander Women in Prison' (2013) Sister's Inside pp 2 available at

<http://www.sistersinside.com.au/media/Papers/The%20Stringer%20April%202013%20Over%20Representation%20of%20Aboriginal%20Women%20in%20Prison.pdf>

<sup>17</sup> Smart Justice, above 12, pp 2.

<sup>18</sup> FVPLS Victoria 'Submission to the Productivity Commission Access to Justice Arrangements' November 2013', pp 6, available at

<http://www.fvpls.org/images/files/FVPLS%20Victoria%20Submission%20to%20Productivity%20Commission%20Access%20to%20Justice%20Arrangements%20Nov%202013.pdf>

<sup>19</sup> FVPLS Victoria, above 18, pp 6

22. There is an enormous social cost of the disproportionate and negative impact of family violence against Aboriginal women. The experience of FVPLS Victoria's legal services team is that Aboriginal women presenting with legal needs after experiencing family violence more often than not also present with other high risk issues including alcohol/drug substance abuse.
23. In addition to the social costs, failure to address violence against Aboriginal women will have significant economic costs. As detailed in the executive summary, as early as 2009, KPMG was projecting that violence against Aboriginal women and their children would cost the Australian economy \$2.2 billion in the year 2021-22.<sup>20</sup>
24. Until the legal system can adequately respond to the intersectionality of Aboriginal women's experiences, the cycle of disadvantage, poverty and transgenerational trauma will continue to lead to poor justice outcomes for Aboriginal women.
25. FVPLS Victorian believes that it is imperative for the Victorian Government to take action to address the barriers facing Aboriginal women to enable access legal support in a culturally safe manner.

## **5 Barriers to justice for Aboriginal women**

26. Aboriginal victims/survivors face significant barriers to seeking legal assistance and other critical support services. Many Aboriginal women lack understanding of legal rights, options and how to access culturally safe services.<sup>21</sup>
27. Aboriginal women have been recognised as one of the most legally disadvantaged groups in Australia<sup>22</sup> and face a wide array of complex and compounding barriers to reporting violence and accessing legal services and support.
28. There are multiple and overlapping causes of Aboriginal women's legal disadvantage including:
  - Lack of understanding of legal rights and options and how to access supports when experiencing family violence;
  - The fear of child removal due to previous policies on child protection and the over-representation of Aboriginal children in the child protection system;

---

<sup>20</sup> KPMG, above 3, pp 9,

<sup>21</sup> Productivity Commission, Volume 2 – Inquiry Report – *Access to Justice Arrangements*, pp 762, available at <http://www.pc.gov.au/inquiries/completed/access-justice/report/access-justice-volume2.pdf>

<sup>22</sup> Aboriginal and Torres Strait Islander Commission (ATSIC), Submission to the Senate Legal and Constitutional References Committee, Parliament of Australia, *Inquiry into Legal Aid and Access to Justice*, 13 November 2003, pp 4.

- Mistrust of mainstream legal and support services to understand and respect the needs, autonomy and wishes of Aboriginal victims/survivors; and
  - Poverty, socio-economic disadvantage and social isolation.
29. The socio-economic disadvantage experienced by Aboriginal women is also closely linked to a greater number of legal issues and Aboriginal women are more likely to experience large and substantial legal problems.<sup>23</sup>
30. FVPLS Victoria clients often incur multiple fines, many of which our clients report are actually incurred by their partners. Many Aboriginal women, due to the economic disadvantage, have difficulty paying the fines; at worst, unpaid fines will result in imprisonment.<sup>24</sup>
31. The impact of these barriers has been demonstrated through primary data collection by FVPLS Victoria. A legal needs survey conducted by FVPLS Victoria at our *Sisters Day Out* workshops held across Victoria during 2013-14 found that almost half (46%) of the participants had experienced a family violence-related legal issue in the previous 12 months but 53% of those women had received no legal assistance for that issue.
32. FVPLS Victoria believes there needs to be a concerted effort and allocation of resources to rectify Aboriginal women's legal disadvantage. Without a targeted and sustained response, there will be further entrenchment of Aboriginal women's inequality in accessing the justice system.

(a) *Police responses*

33. A critical issue preventing our clients' access to justice relates to poor police responses and discriminatory practices. Aboriginal victims/survivors tell us about deeply concerning responses they receive from police when trying to report family violence or to access intervention orders.
34. Over the last 12 months, FVPLS Victoria have received a number of complaints in relation to negative attitudes by members of the police.
35. Our lawyers have assisted clients in a number of cases in which victims/survivors have attempted to report alleged breaches of family violence intervention orders, but police have declined to take action to investigate or charge.

---

<sup>23</sup> Christine Coumarelos et al., *Access to Justice and Legal Needs Volume 7, 'Legal Australia-wide Survey: Legal needs in Australia'* Law and Justice Foundation, pp 206, available at <http://www.lawfoundation.net.au/ljf/app/6DDF12F188975AC9CA257A910006089D.html>

<sup>24</sup> Victorian Human Rights and Equal Opportunity Commission, above 10, pp 9

36. Responses reported to FVPLS Victoria lawyers and paralegal support workers include:
- Comments that minimise violence, such as: “Well, he only hit you in the face this time. Maybe things are getting better”;
  - Comments that undermine victims/survivors’ trust in Intervention Orders or deter them from seeking such orders, for example: “If you apply for an order and take him to Court that might just make him more angry, don’t you think?”; and
  - Comments that discourage women experiencing family violence from seeking Intervention Orders that protect their children in the absence of a referral for family law legal advice, “Do you think it’s right to keep your child from seeing his dad?”<sup>25</sup>
37. Further our lawyers have assisted clients who were arrested having been a victim of family violence for outstanding warrants, overdue fines or allegations of use of violence in response to the perpetrator. There is also often the additional stigma experienced as a result of previous interactions with police.
38. Poor responses by police in responding to family violence reporting fosters distrust and fear which creates a barrier to Aboriginal women accessing justice.
39. The importance of projects like FVPLS Victoria’s Koori Family Violence Police Protocols (KFVPP) cannot be overstated. KFVPPs brings police and communities together to develop local culturally safe protocols for police when they receive a report of violence.

(b) *FVPLS Victoria Prisoner Support Program*

**FVPLS Victoria Prisoner Support Program**

In response to the marginalisation experienced by Aboriginal women in prison, FVPLS Victoria has been successful in gaining short term funding to 30 June 2016 for a Prison Support worker (PSW). The role of the PSW is to provide a fortnightly outreach service for Aboriginal women incarcerated at Dame Phyllis Frost Centre (DPFC) and facilitate their access to legal representation.

Women who fit within FVPLS Victoria’s guidelines are referred to the Prisoner Support Program either by the prison or the FVPLS Victoria Legal team. The support available whilst in prison includes non-legal supports to strengthen women’s position in preparation for release. Particular focus will be on; assistance linking in with housing agencies, accessing counselling, accessing drug and alcohol treatment and other support services.

---

<sup>25</sup> FVPLS Victoria, above 7, pp 47.

Through our contact with the prison system we have noticed an increased number of Aboriginal women from regional Victoria currently incarcerated.

This new program will ensure post-release support services are in place for FVPLS Victoria clients. Targeted funding and resourcing of programs like this are critical to overcoming barriers to access to justice for Aboriginal women.

40. It is imperative that the Victorian Government take action to address the barriers facing Aboriginal women to enable access to legal support in a culturally safe manner. Effectively addressing barriers needs to be done in partnership with specialised, culturally safe Aboriginal community controlled organisations such as FVPLS Victoria.
41. **Recommendation 1:** That the Victorian Government undertake a comprehensive inquiry into the barriers faced by Aboriginal women in accessing services, including addressing the intersectionality of disadvantage.
42. **Recommendation 2:** That the Victorian Government provide ongoing funding to enable the FVPLS Victoria Prison Support Worker role to continue beyond June 2016 to assist vulnerable and marginalised Aboriginal women in prison to have equal access to justice.

## 6 Term of Reference 1: The Availability of Legal Information

43. The previous section of this submission detailed the barriers faced by Aboriginal women from accessing the justice system. The availability of legal information for Aboriginal women is extremely limited and this is exacerbated by and compounds barriers in accessing the legal system.
44. Specialised services such as ours are vital to assist in overcoming barriers to accessing legal information. Our recommendations also include:
  - a) Community legal education and early intervention and prevention work (see below for programs);
  - b) Provision of legal information through legal work;
  - c) The need for multiple entry points to the legal system; and
  - d) The reinstatement of Aboriginal Liaison Officers.

### (a) *Community legal education and early intervention and prevention work*

45. Community legal education and early intervention and prevention (CLE/EIP) work is integral to increasing the availability of information in relation to the legal system and to 'empower women, children and elders who are generally the most isolated from law and justice services'.<sup>26</sup>

---

<sup>26</sup> Commonwealth Attorney General's Department, cited in FVPLS Victoria, *A Force To Be Reckoned With* 2002-2012, pp 32.

CLE/EIP is therefore critical to breaking the access barriers facing Aboriginal women.

46. FVPLS Victoria's CLE/EIP program is designed to enhance Aboriginal women's understanding of their legal rights and access to legal avenues and support services. It draws on cultural strength to build resilience and reduce vulnerability to family violence.
47. The CLE/EIP activities undertaken by FVPLS Victoria include:
  - Delivering workshops and community information sessions for Aboriginal communities about legal options available and the process to access support;
  - Delivering training and forums to community workers and professionals to better support Aboriginal clients by providing culturally appropriate responses and referrals;
  - Publishing and disseminating culturally safe information for the community about legal avenues and support services;
  - Informing decision-making about new areas of legal need, new stakeholder and sector partnerships, and new outreach models and locations; and
  - Participating in relevant networks and advisory groups in the region in order to raise awareness of the issues faced by Aboriginal victims/survivors and strengthen referral pathways.

### ***FVPLS CLE/EIP Programs***

#### *Sisters Day Out®*

FVPLS Victoria's *Sisters Day Out* program has been extremely successful in linking Aboriginal women with the appropriate legal services and other support services.

*Sisters Day Out* is a one-day workshop which draws on cultural strength to build resilience and self-esteem among Aboriginal women and breaks down barriers to accessing services and reporting violence. The workshop format provides a culturally safe space for Aboriginal women to gain some respite from life stressors, obtain information and engage with support services.

The aim of *Sisters Day Out* is to prevent family violence through addressing root causes of Aboriginal women's vulnerability to violence and victimisation. These include social isolation, barriers to accessing services, lack of knowledge about legal rights and mistrust of, and reluctance to engage with the legal and mainstream support system.

*Sisters Day Out* has reached nearly 8,000 Aboriginal women in Victoria through 100 workshops delivered since its commencement in 2007.

### *Dilly Bag*

The Dilly Bag programs are intimate, intensive workshops for up to 20 Aboriginal women. These workshops prevent and reduce family violence by drawing on Aboriginal culture and Aboriginal women's traditional role as nurturers and leaders. The workshop format and activities emphasise self-nurturing and healing from trauma, promote cultural identification, and assist women to strengthen their resolve and resilience.

Dilly Bag was developed in response to an identified gap in therapeutic programs that provide culturally-based healing for Aboriginal women where the program has been developed and delivered for and by Aboriginal women. The Dilly Bag program not only aims to help Aboriginal women to recover from trauma they have experienced in their lives, but also aims to provide a foundation for women to reach their life potential and to consider future life choices.

### *Dilly Bag: The Journey*

Dilly Bag: The Journey is an extended program where participants stay together over three days at a private, tranquil and culturally appropriate location. This strengthens outcomes and opportunities for activities that allow participants to form strong bonds, intensify healing and obtain respite from their daily life stressors.

The program seeks to positively impact on the community by supporting women to undertake a leadership role in speaking out about the issues facing their communities, including family violence.

### *Young Luv*

The Young Luv program is part of FVPLS Victoria's Early Intervention and Prevention program and it is focused on promoting healthy relationships for Aboriginal young women between 13 and 18 years old.

Young Luv is an innovative and engaging program developed by and for young Aboriginal women. This program engages young women in a culturally safe space where they can talk about, reflect on and better understand important issues including:

- the dynamics of healthy relationships;
- safety while dating, including how to access appropriate support and services;
- how to recognise inappropriate or unsafe behaviour; and
- safety online and appropriate use of social media.

The program is delivered in a one-day workshop format where participants can develop skills for identifying respectful and healthy boundaries in relationships.

48. In 2014, FVPLS Victoria sought an independent, external evaluation of CLE/EIP programs including *Sisters Day Out*, *Dilly Bag* and *Dilly Bag: The Journey*. The independent evaluation noted that investments in early education and prevention programs have financial and social dividends.<sup>27</sup>
49. Despite the success of our programs, FVPLS Victoria has continually faced an environment of funding uncertainty for its CLE/EIP Program.
50. **Recommendation 3:** That the Victorian Government ensures sustainable ongoing funding for FVPLS Victoria's CLE/EIP Programs including *Sisters Day Out*, *Dilly Bag*, *Dilly Bag: The Journey* and *Young Luv*.

(b) *Provision of legal information through legal work*

51. The availability of legal information hinges upon FVPLS Victoria's capacity to respond to emerging issues facing our clients. Through our legal work with our clients, we identify a variety of issues that could be resolved by early provision of legal advice, information and referrals.
52. The provision of information in relation to Family Law, whilst relevant to Commonwealth legislation, is a clear example where early provision of legal information can prevent further escalation of issues.
53. Providing information about Family Law is crucial as there is a capacity to inform the Aboriginal community about the law from a rights base rather than at the point of intervention, such as police charges or child protection notifications.
54. FVPLS Victoria services are not just tertiary services; providing legal support to Aboriginal women is one of the most effective forms of early intervention and prevention.

**Availability of legal information: Family Law example**

FVPLS Victoria has identified a 145% increase in Aboriginal clients experiencing family violence in the Mildura region since 2008. Our office in Mildura is currently staffed by one lawyer and one paralegal support worker (PLSW) who identify unmet family law-related issues faced by their clients on a regular basis.

The capacity gap in relation to Family Law and Aboriginal families is acknowledged as a sector wide issue; the most recent report on unmet legal needs identifies a significant gap in the uptake of family law services to the Aboriginal community.<sup>28</sup>

FVPLS Victoria believes that there is an important opportunity to assist clients to access their rights in respect to the *Family Law Act 1975* is to capture those most

---

<sup>27</sup> Evaluation Report of the Aboriginal Family Violence Prevention and Legal Service Victoria's Early Intervention and Prevention Program, Lord Mayor's Charitable Foundation, July 2014, pp 11

<sup>28</sup> Indigenous Legal Needs Project VIC Report (2013), Schwartz, Allison & Cunneen  
[https://www.jcu.edu.au/data/assets/pdf\\_file/0011/121889/jcu\\_131180.pdf](https://www.jcu.edu.au/data/assets/pdf_file/0011/121889/jcu_131180.pdf)

vulnerable at the point of contact with the justice system. Victorian Legal Aid have also identified this pathway as integral to assisting vulnerable clients.

There is an identified and growing need to provide legal services to victims of family violence. The capacity to respond to client's needs in family law beyond the initial point of crisis response will continue to be an issue unless greater resourcing to the legal practice occurs.

55. The funding needs of FVPLS Victoria are discussed in further detail under section 8: Terms of reference 6 - Funding, below.

(c) *The need for multiple entry points to the legal system*

56. The Productivity Commission *Inquiry report- Access to Justice Arrangements*<sup>29</sup> and the *Background Paper* to this inquiry discuss the benefits of a "single-entry point into the legal system".<sup>30</sup>
57. Whilst potentially useful, discussions on a single entry point are predicated on an assumption that all Victorians are in a position to seek legal services and seek them in the same manner. Such a viewpoint minimises the diversity across the Victorian community and the barriers that impede Aboriginal women's access to the Victorian legal system.
58. Furthermore, a single-entry point diminishes an Aboriginal woman's ability to choose where she may access legal services. Stripping away a degree of choice may undermine the trust that is already lacking within the Aboriginal community and serve to create further barriers to accessing services.
59. FVPLS Victoria believes that deeply entrenched barriers to justice are best remedied through a holistic model of service delivery, and this would be difficult to deliver in a single entry point model.
60. FVPLS Victoria does recognise the importance of strengthening inter-organisational links as well as the need for strong referral networks to exist. However, this need can be addressed without diminishing the multiplicity of access points that should be available to Aboriginal women.
61. **Recommendation 4:** The development of a model by the Victorian Government to assist Victorians better access justice should be undertaken in partnership with FVPLS Victoria to prevent further marginalisation of Aboriginal women.

---

<sup>29</sup> Productivity Commission, Volume 1 *Inquiry Report: Access to Justice Arrangements*, pp 165, available at <http://www.pc.gov.au/inquiries/completed/access-justice/report/access-justice-volume1.pdf>

<sup>30</sup>Victorian Attorney-General 'Access to Justice Review' 2016, Background paper: *Accessible Legal Information*, pp 7, available at <http://myviews.justice.vic.gov.au/accesstojustice>

(d) *Aboriginal Liaison Officers*

62. FVPLS Victoria believes that the Victorian Government should ensure the provision of Aboriginal Liaison Officers in all courts and tribunals similar to the Family Court of Australia's past Indigenous Family Liaison Officers (IFLO) program.<sup>31</sup>
63. The IFLO program was an important addition to the Family Court of Australia as evidenced by the significant decline in Aboriginal peoples' engagement with the court following the cessation of the program in 2008.<sup>32</sup>
64. The use of the IFLO Program is further supported by the positive impact on Aboriginal court users through the implementation of Koori Court officers in Courts throughout Victoria.
65. **Recommendation 5:** That the Victorian Courts employ Aboriginal Liaison Officers as an important route through which Aboriginal engagement with the legal system can be facilitated.

## 7 Term of Reference 2: Diverting People from Civil Litigation

66. Section 4 of this submission outlined that family violence is a key contributor to Aboriginal child removal. The extraordinary rates of contemporary Aboriginal child removal and child protection intervention in Aboriginal families can act as a significant deterrent for Aboriginal victims/survivors to disclose family violence and seek assistance from services.
67. Our clients often report that they did not know that child protection intervention was a legal matter until their child/ren were removed or DHHS initiated a Protection Application. Some community members report explicitly being told by child protection workers that they do not need a lawyer.
68. Victoria should implement a mandated and enforceable process to ensure that FVPLS Victoria is immediately notified when an Aboriginal client comes into contact with child protection authorities. In addition, that the client is also immediately advised of the need to obtain independent legal advice at the earliest opportunity.
69. Ensuring that Aboriginal women have access to legal advice at the earliest point possible could prevent significant social and economic costs further down the track. This is of particular importance in the context of recent reforms to child protection legislation that impacts on Aboriginal families by imposing time constraints to permanency of care.

---

<sup>31</sup> FVPLS Victoria, above 18, pp 7-8,

<sup>32</sup> Stephen Ralph, 'Indigenous Australians & Family Law Litigation: Indigenous Perspectives on Access to Justice' (Research Report, Family Court of Australia, October 2011) 41.

70. **Recommendation 6:** That the Victorian Government implement a mandated and enforceable process for ensuring FVPLS Victoria is notified when an Aboriginal client comes into contact with child protection authorities. FVPLS Victoria should be resourced accordingly.

## 8 Term of Reference 6: Funding

71. Currently, FVPLS Victoria is the only Aboriginal community controlled holistic legal service working exclusively with Aboriginal victims/survivors of family violence and sexual assault. Outlined in this section are three key points:
- The current uncertain funding climate faced by FVPLS Victoria;
  - Joint funding support from both Federal and State governments; and
  - An evidence based assessment of funding to meet legal need.
72. FVPLS Victoria receives its core funding from the Commonwealth Government under the Indigenous Advancement Strategy (IAS). In 2015 FVPLS Victoria's core organisational funding was fixed for three years at 2013-2014 levels under the IAS without CPI indexation.
73. FVPLS Victoria has also attracted supplementary funding from the State Government, Victoria Legal Aid and philanthropic sources. However real funding per person aggregated across both ATSILS and FVPLSs declined by approximately 20% in recent years.<sup>33</sup> FVPLS Victoria's resourcing cannot keep pace with the increasing demand for legal service in the Aboriginal sector.
74. Without a secure, ongoing funding base, services may be provided on an inconsistent or ad hoc basis. Consistent funding is essential if our programs are to maintain and build trust within the Aboriginal community. This is particularly important considering that FVPLS Victoria are the only legal service in Victoria for Aboriginal victim/survivors of family violence.
75. Ongoing and sustainable funding for FVPLS Victoria remains short-term and uncertain. Five year funding agreements would assist in overcoming this problem.
76. FVPLS Victoria believes that funding for the legal assistance sector, including funding for FVPLSs should be based on evidence-based research on legal needs (met and unmet).
77. There is a growing body of evidence about the need for increased funding, to meet need including the Indigenous Legal Needs Report which

---

<sup>33</sup> Productivity Commission, above 21, pp 700, 801.

recommended increased funding across the legal sector to address the family and civil law needs of Aboriginal Victorians.<sup>34</sup>

78. However, there has been no systematic or evidence-based assessment of what the overall quantum of funding (both Commonwealth and State) for legal assistance should be in Australia to meet legal need. The Productivity Commission has suggested the total quantum of funds allocated is not sufficient to meet need, and called for an immediate interim funding boost of \$200 million for legal assistance services, including FVPLS's.<sup>35</sup>
79. A cooperative approach between the Commonwealth, State and Territory Governments and the legal assistance sector is needed to determine what the appropriate quantum of funding is for the sector to meet legal need. This should include a regular national assessment of legal need, and determining the contribution of Commonwealth, State and Territory Governments to that quantum as well as the appropriate allocation of the quantum to the four key legal assistance providers.<sup>36</sup>
80. FVPLS Victoria encourages the Victorian Government to assume a leadership role and work collaboratively with the Commonwealth to ensure that the legal assistance sector in Victoria is resourced to meet legal need.<sup>37</sup>
81. **Recommendation 7:** That the Victorian Government work with the Commonwealth to ensure that the legal assistance sector is funded to meet legal need. This is to be determined by a regular evidence-based assessment of need.

## 9 Term of Reference 7: Duplication of Services

### (a) *Distinct role for Aboriginal community controlled organisations.*

82. The establishment of FVPLs across Australia was premised on three key points:
  - The prevalence of family violence and the disproportionate impact on Aboriginal women;
  - Existing services, like ATSILs were not appropriate to represent the legal needs of Aboriginal victims/survivors of family violence as the

---

<sup>34</sup> FVPLS Victoria, above 7, pp 28.

<sup>35</sup> Productivity Commission, above 21, pp 741.

<sup>36</sup> NACL Federal Budget submission, 2016 pp 15.

<http://www.nacli.org.au/resources/NACL Federal Budget Sub 2016 17 Final PDF.pdf>

<sup>37</sup> Noting the 60%-40% funding split of the Commonwealth and State Governments detailed by the Productivity Commission, above 21, pp 739.

alleged perpetrator was already being represented by that service<sup>38</sup>;  
and

- The perceived conflict by the community and preference to access an independent service. Aboriginal victims/survivors of family violence are often reluctant to engage with a legal service of which they suspect the alleged perpetrator has been serviced by the same lawyers.
83. FVPLS Victoria is of the opinion that distinct and separate services are necessary to support the diverse needs of the Aboriginal community. A perceived duplication may actually serve a distinct and important function within the community sector.
84. FVPLS Victoria does recognise the importance of the efficient and effective use of resources however, as outlined, mainstream services cannot meet the needs of Aboriginal women. The focus for government needs to be on supporting culturally safe services and investing funding in preventing further consequences of family violence on Aboriginal communities.
85. **Recommendation 8:** That the Victorian Government increasingly fund Aboriginal community controlled organisations separately to maintain and develop the specialised skills that are crucial for effective service delivery. The need for specialised and culturally safe services cannot be overstated given the highly distinct challenges faced by Aboriginal women.

*(b) Relationship building*

86. The critical aspect of successful engagement with the Aboriginal community is building relationships of trust and confidence – FVPLS Victoria has the connection to the communities through community control and leadership. FVPLS Victoria is Aboriginal community controlled with an all Aboriginal board and CEO and over one third of our staff identify as Aboriginal and/or Torres Strait Islander.
87. As an Aboriginal community controlled organisation, we invest heavily in gaining the trust of our community and it is exactly due to that commitment that we can go further with our engagement with Aboriginal women, unlike mainstream organisations.
88. Fundamental to our relationship building model is that we take our services to communities because FVPLS Victoria understands that without relationship building clients face significant barriers to walking through the doors of our service.

---

<sup>38</sup> FVPLS Victoria *above* 7, pp 26.

89. The service that FVPLS Victoria provides as an important specialised service within the Aboriginal legal service sector is well established.<sup>39</sup> The Productivity Commission advocates for the continuation of our specialised legal services:

*“... FVPLS face a number of distinctive needs and service delivery challenges emanating from cross-cultural issues, remoteness and language barriers of their clients. Together with Aboriginal and Torres Strait Islander peoples’ well documented socioeconomic disadvantages and over-representation in the criminal justice system, these challenges create a distinctive service delivery environment for FVPLS.... These unique circumstances warrant the continuation of specialised Indigenous-specific legal assistance services...”*<sup>40</sup>

(c) *Cultural safety*

90. FVPLS Victoria is of the opinion that mainstream service providers cannot be designated as culturally safe – it is only Aboriginal community controlled organisations that are able to provide this service.
91. Mainstream service providers and organisations however need to be culturally aware and embed culturally appropriate practices into the core of their service delivery model.
92. Cultural safety cannot be achieved solely through the employment of Aboriginal staff. Aboriginal staff in large mainstream organisations can easily become over-burdened by expectations within the organisation, service Aboriginal clients and continually educate non-Aboriginal colleagues about cultural matters.<sup>41</sup>
93. Increasing cultural capacity in mainstream services is important as it ensures that the service is cognisant of issues facing Aboriginal communities and enables Aboriginal women to choose which service is preferred or most appropriate.
94. Efforts to increase cultural capacity should be undertaken in consultation and partnership with Aboriginal legal service providers, with the clear and overarching goal being to support Aboriginal legal service providers to address unmet legal needs.
95. **Recommendation 9:** That the Victorian Government ensures that all funding agreements with mainstream organisations stipulate a condition of cultural awareness training when they are awarded funding for work with the Victorian Aboriginal community.

---

<sup>39</sup> Productivity Commission, above 21, pp 766,

<sup>40</sup> Ibid pp 767,

<sup>41</sup> FVPLS Victoria ‘Submission to Victorian Legal Aid Family Law Services Review’, 2015 pp 4, available at <http://www.fvpls.org/images/files/Submission%20to%20VLA%20Family%20Law%20Services%20Review%20-%20final.pdf>

(d) *Culturally safe access across metropolitan and regional Victoria*

96. Despite services being proximal, Aboriginal women in metropolitan areas face access barriers if organisations aren't perceived as being culturally safe or trusted by the community. Service delivery via culturally safe Aboriginal community controlled organisations is the critical pathway to improving access to justice.
97. This may be due to the inherent barriers that Aboriginal people experience when accessing such services, and/or the inadequacies of mainstream services in responding to the needs of Aboriginal clients.<sup>42</sup>
98. As noted in the 2013 Commonwealth *Attorney-General Department's Review*:
- "..many Indigenous women do not access mainstream domestic violence services because they do not feel comfortable with the organisation itself and don't feel that the staff understand their culture, values and needs."*<sup>43</sup>
99. FVPLS Victoria has operated in an environment of funding uncertainty. The policy of short-term funding for Aboriginal victims/survivors' legal services raises serious implications for service continuity and unnecessarily creates trust/mistrust issues for Aboriginal clients and communities<sup>44</sup>
100. Whilst rates of reporting of family violence amongst Aboriginal women has escalated, there has not been a comparative increase in funding for services to support Aboriginal women.<sup>45</sup>

## 10 Term of Reference 9: Self-represented Litigants

101. FVPLS Victoria has significant contact with self-represented litigants (SRLs). In the experience of FVPLS Victoria's legal team, SRLs often leave the court system with a worse outcome than if they had been represented.

### *Self Representation in the Aboriginal context*

102. Our experience is that FVPLS Victoria clients rarely choose to represent themselves. Typically, self-representation is a result of not being able to afford legal services.

---

<sup>42</sup> FVPLS Victoria, above 18, pp 8,

<sup>43</sup> Commonwealth Attorney-General's Department and the Nous Group, 'Family Violence Prevention Legal Services – Research and Needs Analysis Report', Research Report, Nous Group, 2013, pp 69.

<sup>44</sup> FVPLS Victoria, above 18, pp 9.

<sup>45</sup> Victorian Auditor General, *Accessibility of Mainstream Services for Aboriginal Victorians*, May 2014, page 57, available at <http://www.audit.vic.gov.au/publications/20140529-Aboriginal-Services/20140529-Aboriginal-Services.pdf>.

103. While any process that improves the experience of self-represented litigants is welcome, it must be recognised that funding the representation of clients will most likely lead to the best justice outcome for the client.
104. FVPLS Victoria has observed self-represented clients being denied interim Family Violence Intervention Orders where FVPLS Victoria-represented clients are awarded an order in very similar circumstances by the same Magistrate in the same court.<sup>46</sup>
105. This demonstrates the necessity of clients having competent, culturally appropriate legal representation throughout the entirety of their matter rather than be forced to self-represent or rely on brief advice from duty lawyers in order to make applications.
106. Another concern that FVPLS Victoria holds is that self-represented litigation by alleged perpetrators may re-traumatize the victim/survivor in cases of family violence.<sup>47</sup>
107. Despite provisions existing in the *Family Violence Protection Act 2008* (Vic) that prevent a perpetrator from cross-examining the victim in contested hearings,<sup>48</sup> there is still significant potential for re-traumatization. For example:
  - A perpetrator may still appear for themselves in a mention hearing and use the court process to intimidate or frighten the victim; and
  - Self-represented litigants will most likely not be able to navigate the legal system in an efficient way and this will cause delay which compounds the trauma experienced by the victim/survivor.
108. The process of a final hearing is extremely inhibiting for those not trained in the law and particularly impacts upon those experiencing mental health issues, acquired brain injuries, depression, substance addictions and/or chronic illness.
109. The idea that there is a saving in limiting availability of legal representation may well lead to a false economy of saving and may result in problems escalating, requiring greater need for resource input down the track.
110. **Recommendation 10:** That the Victorian Government investigate law reform avenues that would limit the potential for alleged perpetrators to self-represent in relation to family violence cases and invest more funding into duty lawyers.

---

<sup>46</sup> FVPLS Victoria, above 7, pp 60.

<sup>47</sup> Productivity Commission, above 21, pp 864,

<sup>48</sup> *Family Violence Protection Act 2008* (Vic) s 70, 71, 72.

## **11 Conclusion**

111. FVPLS Victoria commends the Victorian government's efforts into this Access to Justice Review. The unmet needs of Aboriginal women require extensive exploration and efforts to address barriers faced for the situation to improve.
112. The recommendations made in this submission provide a starting point, including the need to undertake a comprehensive inquiry into the barriers faced by Aboriginal women in accessing the justice system.
113. The need to work in partnership with our service and other Aboriginal organisations to address the barriers faced by Aboriginal women in accessing the justice system is critical. Early access to legal services and support prevents escalation of issues faced, preventing long term societal costs to both Aboriginal communities and the broader community.
114. FVPLS Victoria is the only service that provides support solely to Aboriginal victims/survivors of family violence and holistically assists with other needs such as referrals to mental health, homelessness and employment services.
115. With a secure funding base, FVPLS could further assist the overwhelming number of Aboriginal women requiring support and preventing the trajectory of Aboriginal women into prison and their children into the child protection system.
116. We call upon the Victorian government to assume a leadership role amongst the states and acts as a champion of Aboriginal women's legal access. Support for specialised Aboriginal culturally safe services will greatly enhance efforts to overcome Aboriginal women's disadvantage in accessing the justice system.

## **Appendix 1: FVPLS Victoria**

FVPLS Victoria provides culturally safe and holistic, frontline legal assistance to Aboriginal and Torres Strait Islander victims/survivors of family violence and sexual assault. FVPLS Victoria also provides early intervention/prevention and community legal education to the Aboriginal community, the legal, Aboriginal and domestic violence sector.

In addition, with support from philanthropic sources, FVPLS Victoria undertakes policy and law reform work to identify systemic issues in need of reform and advocate for strengthened law and justice outcomes for Aboriginal victims/survivors.

FVPLS Victoria is open to Aboriginal men, women and children who have experienced or are at risk of family violence or sexual assault, as well as non-Aboriginal carers of Aboriginal children who are victims/survivors of family violence. FVPLS Victoria is not gender specific, however at last count 93% of our clients were women.

FVPLS Victoria's legal services include advice, court representation and ongoing casework in the areas of:

- family violence intervention orders;
- child protection;
- family law;
- victims of crime assistance; and
- where resources permit, other civil law matters connected with a client's experience of family violence such as: police complaints, housing, Centrelink, child support and infringement matters.

FVPLS Victoria has a holistic, intensive client service model where each client is assisted by a lawyer and paralegal support worker to address the multitude of interrelated legal and non-legal issues our clients face. FVPLS Victoria paralegal support workers, many of whom are Aboriginal women, provide additional emotional support, court support and referral to ensure the client is linked into culturally safe counselling and support services to address the underlying social issues giving rise to the client's legal problem and experience of family violence.

## **Appendix 2: Other relevant FVPLS Victoria Submissions**

Please find attached a copy of the following submissions made by FVPLS Victoria which relate to our *Access to Justice Submission*:

Submission to Senate Inquiry into Access to Legal Services; Aboriginal and Torres Strait Islander experiences of law enforcement and justice systems - May 2015

Submission to Victoria Legal Aid Family Law Services Review - February 2015

Submission on the Productivity Commission's Draft Report regarding Access to Justice Arrangements - May 2014

FVPLS Victoria submission to Royal Commission into Family Violence - July 2015

## Appendix 3: Endorsement by Women's Health Victoria (WHV)



**Women's Health**

V I C T O R I A

healthy • empowered • equal

26 February 2016

### Re: Access to Justice Review

Women's Health Victoria (WHV) is pleased to endorse the Aboriginal Family Violence Prevention and Legal Service Victoria (FVPLS) submission to the Victorian Access to Justice Review.

WHV is a statewide women's health promotion, information and advocacy service. We work collaboratively with health professionals, policy makers and community organisations to influence and inform health policy and service delivery for women.

Access to justice and freedom from violence and discrimination are key determinants for both women's health and wellbeing and broader gender equality.

The goal of WHV is not only to achieve equity in health outcomes for women and men, but also to achieve equity in outcomes for all groups of women. This means balancing universal strategies with specialist, tailored approaches for women who experience intersectional disadvantage including Aboriginal women and girls.

WHV acknowledges the specialist expertise of FVPLS in relation to both justice, and the specific approaches needed to improve outcomes for Aboriginal women and girls. We are therefore pleased to endorse FVPLS's submission and support the recommendations made in the submission.

We look forward to working with FVPLS and the government to support better, more equitable health and justice outcomes for all Victorian women.

Yours sincerely,

Rita Butera  
Executive Director