

**Response to the Family Violence Reform Implementation Monitor's call for submissions:
Review of family violence information sharing and risk management – June to September 2022**

Submission #17 – Organisation – Other

The Family Violence Information Sharing Scheme and Central Information Point

Please reflect on your experience in collecting, requesting, using or disclosing confidential information in the past 3 years when responding to the following questions.

1. Are the legal requirements in the Act sufficiently clear?

In responding to this question, please consider whether you feel the Act is sufficiently clear in relation to the meanings of key terms (such as person of concern, primary person, confidential information and excluded information), the circumstances in which confidential information can be requested or disclosed, record-keeping requirements and any other matter

Yes

2. The Act outlines principles, and requires the Minister to issue guidelines, to guide decision-making in relation to the collection, use or disclosure of confidential information.

a) To what extent are the principles reflected in your organisation's policies, procedures, practice guidance and tools?

Mostly

How could this be improved?

We are still working towards consistent application and as we apply the policies we are building the knowledge and skills to use it -it's a maturity model.

b) Do the principles and guidelines support you to make decisions under the Act?

Yes

3. Does the Act provide sufficient scope and authority for you to collect, request, use or disclose all information you feel is needed to effectively establish, assess and manage risks of family violence?

Yes

4. Have you been able to obtain consolidated and up-to-date information from the Central Information Point (CIP) about perpetrators of family violence to support your organisation to assess and manage risks of family violence?

No

5. Have you observed an increase in the level of information sharing, including:

a) information being disclosed voluntarily?

Yes

Please make any additional comments.

Generally received quicker over the three years. It has driven a practice change, we now see the information we hold in a different light and are able to gather information to assist with improved risk assessment and safety planning. Some parts of the organisation are still feeling a bit stuck working through the practice concerns related to consent though.

b) information being disclosed on request?

Yes

Please make any additional comments

Generally received quicker over the three years. It has driven a practice change, we now see the information we hold in a different light and are able to gather information to assist with improved risk assessment and safety planning. Some parts of the organisation are still feeling a bit stuck working through the practice concerns related to consent though.

6. Have you observed an increase in the level of collaboration between organisations to support the delivery of coordinated services?

No

Please make any additional comments.

We don't have an Orange Door as yet, we haven't observed collaboration and still see a lot of siloing in practice delivery and case coordination.

7. Have you experienced any legal barriers or challenges in:

a) collecting, requesting, using or disclosing information?

No

b) collaborating with other organisations to deliver coordinated services?

No

c) complying with the Act's requirements?

No

8. Are you aware of any instances of the unauthorised use or disclosure of confidential information under the FVISS or CIP provisions?

No

Family Violence Risk Assessment and Risk Management Framework

Please reflect on your experience in aligning your organisation's policies, procedures, practice guidance and tools with the MARAM Framework when responding to the following questions.

9. Are the legal requirements under the Act sufficiently clear, including in relation to the meaning of framework organisation and section 191 agency?

Yes

10. Have you observed greater consistency in organisations' approaches to family violence risk identification, assessment and management?

Yes

Please make any additional comments.

Even when collating we apply the MARMA Framework language which aids in cohesive collaborative practice. One of the challenges has been navigating having roles with different levels of responsibility which added to the complexity of implementation.

General

11. Have you observed any adverse effects of the provisions for particular groups, such as children and young people, adolescents who use violence in the home, or members of the Aboriginal community?

Yes

What types of adverse effects have you observed?

The staff have an difficulty assessing risk of adolescents using violence as there hasn't been access to a risk assessment tool.

12. Do the provisions sufficiently provide for the needs and characteristics of diverse communities?

No

If no, please indicate why.

Miss identification of women as perpetrators - and this notable in families from more diverse backgrounds. And need to hold on to the application of structural judgement in the work in applying the risk assessment tool as we have identification and brief and intermediate level of responsibility.

13. Do you have any other comments about the operation of the provisions, including any suggestions for improvement?

We are looking forward to the commencement of the CIP in the North West and metro region of Melbourne. We experience additional barriers and admin process to complete a CIP at the moment which contributes to lack of consistency and timeframes of getting response - and ultimately extra work. Issues with staff to cover Children's Early Years services backfill and access to training. Further training required to implement the people who use violence guidelines. Further consideration needed regarding the financial impact of 'leaving the family property' when safety planning and the risks regarding long term poverty. More funding and service support is needed to support women and children in recovery from the trauma and impact of family violence.