



## The Salvation Army Australia Territory

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Family Violence Reform Implementation Monitor  
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### Review of family violence information sharing and risk management

Dear Jan Shuard PSM,

The Salvation Army thanks the Family Violence Reform Implementation Monitor for the opportunity to comment on the legislative review of the Family Violence Information Sharing Scheme and Risk Assessment and Management Framework. We applaud the Victorian government's recognition of the devastating and often integrational impacts of family and domestic violence on the community following the Royal Commission into Family Violence.

The Salvation Army offers a range of specialist family and domestic violence services in Victoria including outreach, crisis interventions, brokerage and emergency accommodation, transitional housing and housing support. The Salvation Army also provides family violence prevention programs to over 2,000 men nationally. Our specialist family violence services also partner with services such as the Victorian Police, Child Protection, Integrated Family Support Services, financial counsellors and courts to offer individualised support to women and their children, addressing risk and safety while planning for recovery.

We commend the Victorian Government on the development of the Family Violence Multi-Agency Risk Assessment and Risk Management (**MARAM**) Framework. This framework has led to better outcomes for victim survivors and children and has also ensured that the perpetrator is kept in view and held to account. The implementation of the MARAM framework has further increased agencies capacity to share information and understand risk, through the Family Violence Information Sharing Scheme (**FVISS**) and Central Information Point (**CIP**). We view these frameworks as examples of best practice of risk assessment and management within the family violence sector. The Salvation Army has embedded the MARAM throughout our family violence services nationwide to ensure consistency in practice within family and domestic violence policies and procedures.

#### [Family Violence Information Sharing Scheme and Central Information Point](#)

**The extent the FVISS and CIP have been effective in the sharing of confidential information for the purposes of establishing, assessing and managing risk**

Founders **William & Catherine Booth**  
General **Brian Peddle**

*Wherever there is hardship or injustice, Salvos will live, love and fight  
alongside others to transform Australia one life at a time with the love of Jesus*

**[salvationarmy.org.au](http://salvationarmy.org.au)**

Since the inception of the FVISS and CIP we have seen a noticeable difference in how we are able to collectively coordinate high quality care for the families we work with. The previous fragmented system has been sidelined for one that now works together to collate information in relation to risk and safety, allowing us to advocate strongly for our clients.

The Salvation Army's men's behaviour change program (**MBCP**) has found the FVISS and CIP incredibly valuable. The MBCP was previously more reliant on the perspective of the perpetrator and often received a one-sided version of events. Since the commencement of information sharing, the MBCP is now able to receive information from the Victorian Police and Corrections, the Orange Door and other risk or information sharing entities. This has assisted greatly when managing and informing the risk of perpetrators as our case managers are seeing the full-scale of events.

The Salvation Army is a partner in the Bayside Peninsula Area (BPA) and Inner Gippsland Area (IGA) Orange Doors, where we have co-located Practice Leads, Specialist Family Violence and Specialist Men's practitioners. We have found information sharing through The Orange Door to be extremely beneficial in terms of what we are able to access, particularly when compared to the minimal information that practitioners were able to access prior to the implementation of the FVISS and CIP. Legislative changes to information sharing have been instrumental in keeping the perpetrator in view and ensuring the ongoing safety of women and children. These changes have also increased workers capacity to comprehensively assess and mitigate risk, leading to better outcomes for victim survivors and children.

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*“We have found that information sharing is extremely beneficial in terms of what we can access, we now have access to information that we previously would have had to fight tooth and nail to get”*

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**- Orange Door Program Manager**

The Orange Doors in BPA and IGA were among the first intake services that went live in 2018. Initially the CIP response was impeccable, and we were able to receive information within hours. As more Orange Doors open, the wait time for information has significantly increased and it is not uncommon to have to wait up to two weeks for a response from the CIP unit. These delays in wait time are problematic as it causes case drift and often prolongs the time that we can respond to the victim-survivor, they are especially concerning where there is an assessment of serious risk. There are also limitations on what the CIP unit can provide, at its inception we were able to receive a holistic overview of all criminal matters relating to the perpetrator. The information is now limited to family violence incidents, with the sharing of information related to other criminal matters being at the discretion of the CIP unit. Receiving information about criminal matters outside of the family violence context is beneficial when determining risk and for planning and assessment. We encourage the Monitor to consider increasing the capacity of the CIP unit so



they are able to respond to information sharing requests and again allow the CIP unit to provide information regarding all criminal matters.

### **Level of collaboration between organisations to support the delivery of coordinated services**

Whilst The Salvation Army remains confident that the overall level of collaboration between organisations to support coordinated services has increased, there are still certain agencies that are not engaging with the CIP and FVISS. Several schools and hospitals are actively responding to our information sharing requests, however, the response is not consistent across the state. Our services are still encountering schools and hospitals that are reluctant to share information. While at times this can be a workforce issue, and services may not have the capacity to respond to a request, we still experience hospitals and schools that hang-up on us when reaching out or fail to respond to an email request.

The level of collaboration between services ultimately depends on the consistent use of the FVISS and CIP. When information sharing is front of mind for all services, the collaboration between services is excellent however, we continue to experience services that are not consistently using the FVISS and CIP. We have, on many occasions, received delayed responses from Child Protection Services and our experience is that e-mails to the centralised email for information sharing requests rarely receive responses. Service providers instead get in touch directly with the relevant team or practitioner; however, it is at times difficult to find out who the best contact person is for a particular case. The below case study demonstrates how inconsistent use of the FVISS and CIP can prolong a case and effect a victim-survivor.

#### **Mary's\* Story**

Mary\* was referred to The Salvation Army's North Specialist Family Violence Case Management and Outreach Services (our services) via The Orange Door. She was misidentified as the perpetrator and listed as the respondent on a Family Violence Intervention Order (FVIO). Mary's toddler daughter was in the custody of her father (the perpetrator) as he took out the FVIO against Mary. Our service updated the comprehensive risk assessment, set out in the MARAM that was completed by the Orange Door, highlighting the perpetrator's further risky behaviours. Our services then engaged and advocated to Child Protection Services, using the MARAM to highlight that Mary had been misidentified and provide evidence that the perpetrator had a history of alcohol and drug misuse. After an investigation, Child Protection Services issued an interim accommodation order, deemed that Mary was safe and her daughter was placed back in her care. The FVIO against Mary was cancelled.

Mary did not immediately take out her own FVIO against the perpetrator for fear that doing so would escalate the violence. While Mary considered her own order, the perpetrator, having been informed that the original FVIO was dropped, re-engaged in the process and contacted Child

Protection Services. The perpetrator stated that he had concerns for his daughter, who was in Mary's care.

At the time Mary and her daughter were being supported at The Salvation Army's 24/7 Refuge due to escalation of risk and safety for both Mary and her daughter. Although Child Protection Services were aware that Mary was being case managed by a family violence service, they failed to request a FVISS from our services. Instead organising for police to complete a welfare check. Had a FVISS been conducted from the outset, a welfare check would not have been necessary. Staff of The Salvation Army refuge, as the specialist family violence service, would have been able to inform Child Protection Services that Mary was at the refuge and ask them not to disclose this to the perpetrator. Instead, the police conducted an in person welfare check at the refuge which was unsettling to Mary and her daughter.

Following these events, Mary chose to proceed with an FVIO against the perpetrator. While waiting for the Court to progress her request, the perpetrator took out another FVIO against Mary and listed their daughter as a protected person. Again, had the Court requested a FVISS they would have unpacked that Mary was in fact the victim-survivor, however, this was not done and the perpetrator's FVIO was approved.

The police came to the refuge to remove Mary's daughter and place her back in the custody of the perpetrator. The police did not engage with Child Protection Services, who were only made aware that Mary's daughter was taken when our service engaged with them.

Through prolonged advocacy and casework, The Salvation Army's North West Family Violence Programs staff were able to have Mary's daughter returned to her care, however this process was lengthy and has traumatised both Mary and her daughter.

*\*Name has been changed*

### **Adverse effects of the FVISS and CIP**

There have been very few adverse effects of the FVISS and CIP, with the frameworks instead leading to more positive outcomes for most victim-survivors that we work with. The only time where there can be unintended consequences of information sharing is when a victim-survivor has been misidentified as a perpetrator. The misidentification of a victim-survivor as a perpetrator can occur in a range of contexts, but it primarily occurs where victim-survivors are misidentified on a family violence intervention order or face criminal charges. In these scenarios, there can be unintended consequences of information sharing, particularly when information about a victim-survivor is shared with the actual perpetrator.

We consider that it is best practice that consent is obtained from the victim-survivor prior to their information being shared, particularly when there is an absence of serious risk. Through the Child Information Sharing Scheme (CISS) information can be shared without consent when there is any concern for a child's wellbeing. There does not need to be serious or imminent risk for this



information to be shared without consent. This in turn has led to requests made by Child Protection Services to access family violence risk assessments that have been completed with a victim-survivor who is a mother of a child without consent. This has placed strain on the relationship between the Orange Door practitioners and Child Protection, as best practice would be that consent is obtained from a victim-survivor before their information is shared in the absence of serious risk.

### Multi-Agency Risk Assessment and Risk Management

#### **Effectiveness of MARAM in providing a framework for achieving consistency in family violence risk identification, assessment and management**

Overall, the MARAM as a tool and framework has been effective in achieving consistency in family violence risk identification, assessment, and management. The MARAM's success is bolstered by the fact that it is supported by a suite of policies, practice tools, training, legislation and formal reviews that aim to change both the practice and culture around how professionals and organisations respond to family and domestic violence.

Risk assessment is one component of the MARAM and while there is consistency in training for risk assessment, the MARAM as a framework is not consistently embedded in organisations. At The Salvation Army we have aligned our Model of Care, case management guidelines and information sharing procedure to the MARAM framework. The MARAM framework is essential in guiding our work and, recognising this, we have embedded it nationwide to ensure consistency in practice within family and domestic violence policies and procedures.

At The Salvation Army we have embedded the MARAM to ensure consistency in how risk assessments are conducted. We require specialist practitioners to complete regular risk assessments with victim-survivors and have guidelines to ensure information is being accurately collated and consolidated. Not all organisations have embedded the MARAM in this manner and the information collated is, therefore, dependent on the practitioner, leading to inconsistencies. We often receive risk assessments that do not outline accurate timelines or fail to report where certain information came from, that is, whether it came from the police, courts or the victim-survivor. Our refuge reports instances where children have not been included in the MARAM so a single room is organised for the victim-survivor which is inappropriate for accompanying children.

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*“The risk assessment component of the MARAM, as a tool, is fabulous. But it is often the case that, when receiving a MARAM, the information you get is only as good as the person who collects it. Sometimes people don't pick up or tease out certain things that the victim-survivor says”*

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**- Family and Domestic Violence Program Manager**



## Amendments that would improve the operation of the MARAM

The Salvation Army remains confident that the MARAM has greatly improved the response that both victim-survivors and perpetrators receive although, as indicated above, there are some inconsistencies in how the MARAM is embedded. For uniformity, it would be beneficial if the MARAM was amended to include guidelines that require practitioners to clearly articulate timelines, source where information came from and indicate if children are involved.

An important feature of MARAM is that it applies an intersectional lens to support diversity and inclusion in family violence practice. The comprehensive MARAM assessment, however, does not fully unpack forced marriage as a form of family and domestic violence. While it would still be dependent on practitioners' understanding of forced marriage, modern slavery and human trafficking, it would be beneficial to amend the MARAM to provide prompting questions that further tease out this form of family and domestic violence.

### Saira's\* Story

Saira\* comes from a culturally and linguistically diverse background and came to The Salvation Army's refuge with two of her three children after being referred to our service via Safe Steps. Saira did not bring her third child because they went to a different school to the other two and she fled the violence perpetrated by her husband so quickly that she didn't have time to pick up her third child. Through our intake process we updated the comprehensive MARAM that was completed by Safe Steps. Saira wanted her third child to be in her care, however she had not yet engaged with police meaning there was no intervention order in place.

We accompanied Saira to the police station where she made a statement and the MARAM was presented. The police then issued a safety notice, naming the child, who was then in the custody of their father, as a protected person. Police also began the process of issuing an FVIO. It took a while for the police to locate the perpetrator, however during this process the police actively engaged with our service through the FVISS. They provided us with regular updates not only on their progress in locating the perpetrator but also on whether the FVIO had been served. Our service simultaneously engaged with and advocated to Child Protection Services, providing them with the MARAM to ensure they were aware of the case.

The outcome was that Saira and her third child were reunited as a result of the collaborative effort between our service, the police and Child Protection Services.

Saira's story is an example of how information sharing and the MARAM can lead to positive outcomes for victim-survivors when they are used effectively.

*\*Name has been changed*



## Conclusion

The Salvation Army thanks the Victorian Family Violence Reform Implementation Monitor for the opportunity to provide a submission. When the FVISS, CIP and MARAM are all consistently and appropriately used, the collaborative approach that results allows the sector to come together to ensure that all clients are able to get the best outcomes. We encourage the Implementation Monitor to address the current inconsistencies in the use and operation of the FVISS, CIP and MARAM to guarantee that victim-survivors can receive positive outcomes.

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 sort from

██████████, Head of Government Relations, on ██████████, or at

Yours sincerely,

Head of Government Relations  
The Salvation Army Australia

22 August 2022

*The Salvation Army acknowledges the Traditional Owners of the lands and waters throughout Australia.*

*We pay our respect to Elders and acknowledge their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.*

*We also acknowledge future aspirations of all First Nations peoples. Through respectful relationships we will work for the mutual flourishing of Aboriginal and Torres Strait Islander Australians and non-Indigenous Australians.*

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

