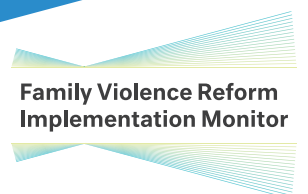


Report of the Family Violence Reform Implementation Monitor

As at 1 November 2017



Family Violence Reform
Implementation Monitor

Family violence services and support

If you have experienced violence or sexual assault and require immediate or ongoing assistance, **contact 1800 RESPECT (1800 737 732)** to talk to a counsellor from the National Sexual Assault and Domestic Violence hotline. For confidential support and information, contact Safe Steps' 24/7 family violence response line on **1800 015 188**. If you are concerned for your safety or that of someone else, please contact the police in your state or territory, or **call 000** for emergency assistance.

Aboriginal Acknowledgment

The Victorian Government proudly acknowledges Victorian Aboriginal people as the first peoples and Traditional Owners and custodians of the land and water on which we rely. We acknowledge and respect that Aboriginal communities are steeped in traditions and customs built on an incredibly disciplined social and cultural order. This social and cultural order has sustained up to 50,000 years of existence. We acknowledge the ongoing leadership role of the Aboriginal community in addressing, and preventing family violence and join with our First Peoples to eliminate family violence from all communities.

Report of the Family Violence Reform Implementation Monitor

As at 1 November 2017

Foreword

The reform of Victoria’s response to family violence, announced in 2016, is ground breaking and world leading. Victoria has taken on an ambitious, challenging and complex reform as it attempts to end family violence. It is an opportunity to lead flagship social policy reform and set the path for jurisdictions around the world. The broad political and community support for the reforms is something of which we, as Victorians, can be proud.

The final report of the Royal Commission into Family Violence gave us not only an inspiring vision but also a significant challenge. How do we do something that has never been done, is incredibly complex, touches every part of government and beyond, and has the potential to change the experience of thousands of Victorians? **What is best for current and future victim survivors?**

The Victorian Government, its sector partners, and victim survivors of family violence are grappling with these questions as they seek to deliver the ultimate outcome of a future where all Victorians are safe, thriving and living free from family violence. The difficulty of this task cannot be underestimated.

My role was established to hold government to account for delivering reform that improves outcomes for victim survivors. Monitoring is a key risk mitigation strategy for effective reform implementation. This report fulfils my obligation to Parliament. It sets out my key findings as at 1 November 2017, and what needs to happen to increase the likelihood of successful reform implementation.

This ambitious program of reform is expected to take 10 years to successfully implement. It is still in its early stages and it is too soon to see whether outcomes are improving. So, I have focused on the foundational areas that are critical to the success of the whole reform, and areas where remedial action is needed. In future years, I hope to be able to better describe how things are changing for victim survivors.

Already I can see that ending family violence and improving outcomes for victim survivors are now clearly established as core objectives of the Victorian Government. In my conversations with peak bodies, non-government agencies, ministers, and shadow ministers, I have consistently heard that they are deeply impressed with the commitment of the public servants working on this reform. This energy and dedication is evident across the implementation of the reform and mirrors the enduring dedication of so many from the family violence sector. The government is also rightly taking the approach that people from diverse communities should be engaged in the reform from the start and the new system should have accessibility and inclusivity at its centre.¹

Early indications suggest major implementation risks need to be addressed. In particular, I expected the foundational work to be much more advanced by now. The government seems to be improving its approach, but whole-of-reform planning has been insufficient for a reform of this size. While I acknowledge that the harm caused by family violence requires urgent action, this urgency must be balanced with planning and ensuring the long term effectiveness of the reform and the best possible outcome for victim survivors.



Tim Cartwright APM

Family Violence Reform
Implementation Monitor

1 The Royal Commission into Family Violence report discusses diverse communities as relating to Aboriginal and Torres Strait Islander peoples; people living in rural, regional and remote communities; older people; people who are part of culturally and linguistically diverse communities; faith communities; lesbian, gay, bisexual, transgender and intersex (LGBTI) people; people with disabilities; male victims; women prisoners; and women who work in the sex industry (Royal Commission into Family Violence (2016), *Volume V Report and Recommendations*).

Although I commenced in this role before 1 January 2017, my findings are based on my statutory monitoring period from 1 January 2017, when my legislation was proclaimed, to 1 November 2017. Where relevant, I have indicated where developments have occurred after 1 November, to give a perspective on the future. My intention is to make this report as forward looking as possible, to provide value to the reader.

Given the complexity of the task, the significant risks around much of the reform activity, and the scale of the resources allocated, the government now needs to invest more time in planning how to best undertake the whole reform. There is still time.

Strong foundations are critical for long term, sustainable change, and can be best achieved with a more systemic, whole-of-government approach supported by strong planning and coordination.

I thank those in the government and the non-government sectors for their assistance and cooperation.



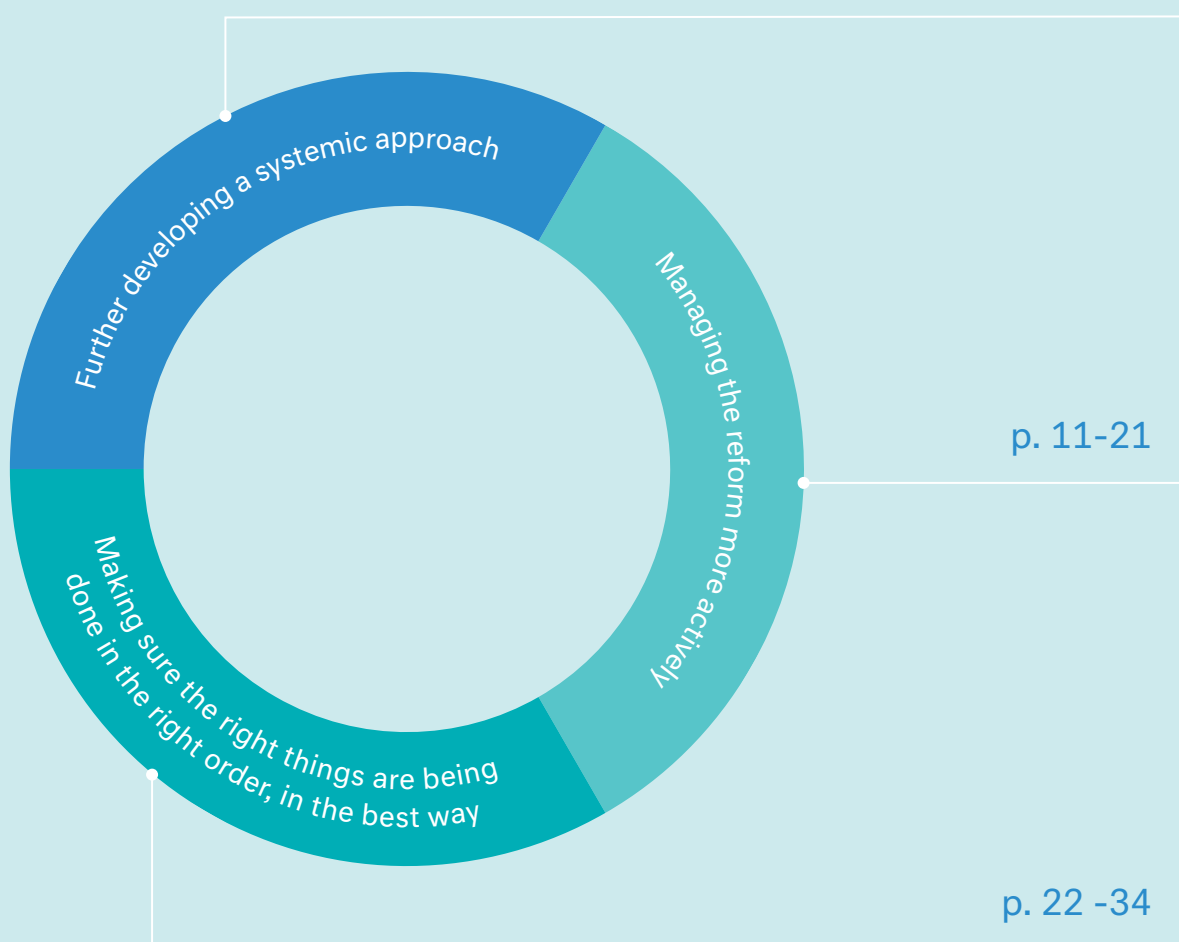
Tim Cartwright APM
Family Violence Reform Implementation Monitor

Structure of the report

This report focuses on three broad themes and their underlying opportunities which the Monitor believes will improve the chances of success for the reform.

Recognising the significant work and effort that has been involved in the reform so far, findings suggest that effectiveness of the reform could be improved by:

p. 3-10



Each chapter of this report focuses on one of these broad themes, setting out the Monitor's observations and corrective action that should be taken to better ensure the reform is implemented successfully.

Corrective actions include undertaking more work to identify dependencies, a renewed focus on how to achieve desired outcomes, and the establishment of a central coordinating body with the right capability, scope, authorisation and accountability.

Improve effectiveness by further developing a systemic approach

The Royal Commission into Family Violence sought a transformation of Victoria's existing family violence response. It called not only for changes to the existing system, but for the introduction of new approaches. It also highlighted that the reform and the proposed initiatives needed to be coordinated and integrated. The reform therefore needs to be driven by a joint understanding of the relationships between all elements of the overarching system, and this systemic thinking should be applied when designing all aspects of implementation. Taking a non-systemic approach is unlikely to achieve the Royal Commission's vision or the vision in the Victorian Government's 10 Year Plan, *Ending Family Violence: Victoria's Plan for Change*.

The government started with a systemic approach. It articulated a vision in the 10 Year Plan and did extensive work consulting the sector and victim survivors and embedding inclusivity and accessibility into the design of the reform. This work was a promising start. It now needs to develop its thinking around how to achieve the envisaged system.

However, the government's current work on the reform is overly focused on acquitting implementation of the Royal Commission's recommendations. While such a focus is understandable and an important element of accountability, it is less important than the work needed to ensure that all the constituent parts of the system are interrelated and will work together over time, within the context of Victoria's broader social services system, to improve outcomes for current and future victim survivors.

It is imperative that the government shifts its implementation activity and reporting away from acquitting recommendations, and towards continuing its whole-of-system reform approach. As part of this, the government should focus its work on articulating the long term perspective including for diverse communities, building capability in the relevant government agencies, and engaging more efficiently with the sector.

What we've seen

The government is disproportionately focused on acquitting the recommendations

The government currently has a significant focus on acquitting the Royal Commission's 227 recommendations. It has built many of its key processes, such as reporting and governance at the whole-of-reform level, around the recommendations; for example:

- allocating ministers and government agencies those recommendations for which they are responsible
- setting up the reform's public acquittal website to track progress of implementation of the recommendations, by giving indications of the number of recommendations 'not started', 'in progress' or 'implemented'
- focusing the whole-of-reform reporting over the monitoring period² largely on recommendations³ rather than outcomes

2 To 1 November 2017.

3 The government introduced some project reporting for which agencies had to develop projects, but these projects are based on the recommendations allocated to that agency and some are based on only one recommendation.

- relating the whole-of-reform internal actions⁴ to recommendations, not programs or work streams.

The emphasis on acquittal means the recommendations are driving reform implementation. This is problematic because, while the recommendations of the Royal Commission are a critical input to the design of the reform and the implementation plan, and acquitting them is an important accountability exercise, they are not sufficient to drive the implementation of the reform. They provide neither sufficient detail nor the necessary systemic approach. They do not consider:

- whether and how the recommendations work together (and may impact on each other)
- what they would produce as a whole and whether this would cover the whole reform (particularly if they are implemented individually rather than as elements of a broader system)
- whether they can achieve the changes envisaged by the Royal Commission and the 10 Year Plan.

The focus on acquitting the recommendations could encourage agencies to prioritise acquittal over other aspects of the reform, and potentially lead them to implement recommendations in isolation. This could result in piecemeal implementation that reinforces fragmentation and silos.⁵ Further, without knowing how recommendations fit together as a system reform, agencies might choose delivery options that meet the letter of the Royal Commission's recommendations, but don't maximise outcomes for victim survivors.

The government should continue its systemic thinking through to whole-of-reform implementation planning

To design and implement the envisaged reform, the government needs to take a system level perspective, to work out the desired end point and how to get there, including how all the components of the new system fit together. Typically, adopting a systemic project approach would involve (among other things) developing a vision, outcomes, work programs⁶, projects, and tasks. Agencies and ministers would be jointly responsible for implementing work programs. The recommendations would not drive implementation but would inform the development of this approach, and completion of individual recommendations would be linked to milestones and implementation actions within the work programs. Ensuring that all recommendations were addressed would then be a relatively simple process. A more detailed implementation plan could highlight the ways in which recommendations are being addressed and explain the outcomes-related reasons for any departures.

One of the Royal Commission's recommendations was that a Statewide Action Plan be developed. The government started by developing a high level vision of the reform in the 10 Year Plan.⁷ It would be expected that as a next step, the government would develop clear work programs to focus the implementation activities around the system. Each work program would include some specific

4 Also called 'milestones', introduced in 2017.

5 See discussion in chapter 5, Royal Commission Into Family Violence (2016), *Volume I Summary and Recommendations*, in particular pp. 89–90.

6 Work programs consist of projects that are grouped together to achieve a common solution to an anticipated requirement or problem.

7 Victorian Government, *Ending Family Violence: Victoria's Plan for Change*, pp. 10–11.

projects, which would identify and track the implementation activities required, including milestones and timeframes. However, the government's initial systemic approach appears to have stalled and been superseded by the focus on implementing and acquitting the recommendations, as discussed above.

Various possible work programs could be interpreted from existing government documents, but the different documents, including the *Family Violence Rolling Action Plan 2017–2020* (the Rolling Action Plan), the 10 Year Plan, and internal planning documents, are not clearly aligned with each other. The Rolling Action Plan alone has two different possible work programs: some iconic initiatives, plus some additional ideas throughout its chapters that don't clearly align with the iconic initiatives. None of the various work programs across the different documents are clearly linked to the outcomes in the 10 Year Plan, and the government has not developed milestones linked to outputs or outcomes delivery for work programs, which would enable it to measure overall progress.⁸ Reporting is not based around these work programs.

The government could build on the work it has done by clearly identifying a single set of work programs to implement the reform. Then, it could use this to guide more detailed planning and implementation. Critical to this is a whole-of-government approach that seeks to overcome the persistent silos in the services that respond to family violence.

The government needs to better articulate a long term perspective on the reform

The government's planning documents have not clearly articulated what activities it has chosen to undertake over the 10-year period. While plans for later years do not need to be detailed, there needs to be some high level indications at this initial stage, as well as throughout implementation, of what will happen in the later years of reform implementation.

The 10 Year Plan and the Rolling Action Plan go some way to describing the activities the government intends to undertake in the next three to four years. However, neither document articulates the medium and longer term actions that will take the system from its current state to the desired future state⁹, nor the relative complexity of these actions. It is not sufficient to wait for subsequent rolling action plans to articulate the high level plan for later years.

The government needs to lay out the phases of the reform, to show how the system will change as the reform is implemented and what it needs to do to achieve this change. The intention of prevention activities, for example, is that they will eventually change the level of crisis response needed, by reducing the overall incidence and severity of family violence. Longer term planning should clearly reflect this desired outcome. It should also address transition issues, such as the different governance arrangements for reform implementation versus ongoing system operation, and how much effort will be put towards addressing urgent issues within the existing system compared with work to develop the new system.

8 There are milestones for the recommendations, but these are not based on a systemic approach that shows how all the component parts fit together and operate over time to produce outcomes.

9 The Royal Commission's report indicated the need for a 10-year reform timeframe, which the 10 Year Plan adopted.

The Department of Premier and Cabinet has commissioned a Family Violence Demand Project to develop a model that enables better understanding of current and future demand and key system and demand pressures. This is also intended to allow for testing of policies and interventions on demand. This project could be used in the future to inform the development of a long term perspective on the reform.

The government needs to continue to build its capabilities for designing, implementing and supporting a new family violence system

The Royal Commission recognised the need for the sector to build its capabilities. The government has acknowledged the significant need to build its capability to support the reform's design and implementation, and then to support the ongoing new system. In particular, the government needs to grow its capabilities in project and program management, implementation planning, and information security, as well as its specialist family violence expertise. This takes time and must be factored into realistic implementation timeframes, but the urgency of implementation to date has made it difficult for this capability development to keep pace.

A challenge across the whole reform is the general lack of project management expertise in social policy, particularly at the program level. This is not a challenge unique to this reform, nor to Victoria: an independent review of government process in the Australian Public Service (APS) found that the APS needs to 'build a stronger cohort of skilled and experienced program and project managers' to support better implementation of large programs and projects.¹⁰

The government has developed a 10-year industry plan (*Building From Strength: 10 Year Industry Plan for Family Violence*) to map out how it will address some of these issues. The Industry Taskforce guided this work, and it was published in December 2017.

Government's engagement with the sector has been broad and innovative, but could be more efficient

The government has consulted widely to support the design and implementation of the various parts of the reform. Coverage has been broad and involved a diverse range of people with different experience and perspectives across the non-government family violence sector, victim survivors, and the community.

The government has placed high importance on effective consultation. At the whole-of-reform level, it created the Co-Design, Consultation and Communications branch of the Department of Premier and Cabinet to drive co-design approaches supported by extensive consultation, communication and engagement with the community, the service sector and other stakeholders. This team has moved to Family Safety Victoria¹¹ and continued this approach. Agencies are also undertaking their own consultation activities to inform implementation.

10 Shergold, P 2016, *Learning from failure: why large government policy initiatives have gone so badly wrong in the past and how the chances of success in the future can be improved*, Australian Public Service Commission, Commonwealth of Australia, Canberra, p. vii.

11 Family Safety Victoria was established in July 2017 as part of the government's response to addressing recommendation 199.

For example, in the Department of Justice and Regulation's restorative justice project, the project team recognised that they needed to carefully plan their stakeholder engagement due to the sensitivity of the subject matter. As a result of well-designed stakeholder engagement the project team were able to refine their original approach in line with feedback received.

The government has recognised the significant load imposed on small organisations to engage in extensive consultation and provided a specific one-off funding package to many organisations to assist them in this work. The government has been flexible in engaging with the community and representative groups (for example, by enabling the sector to nominate people who should be involved in committees or consultative activities). It has also been flexible in the way it allows interaction, including not always requiring participation to be face-to-face. The government is mindful of 'consultation fatigue' and aware that co-design approaches often take longer than traditional approaches. It has shown a willingness to listen when stakeholders have raised concerns about the timeframes for participation and what role their input will play.

Nevertheless, sector stakeholders have advised that, at times, the government could be clearer about how it intends to engage and how it will use the input it receives. There is an opportunity to work more efficiently with stakeholders to ensure that the government is making the most of stakeholders' time and expertise. In particular, the government needs to be clear with agencies about the extent of the consultation they intend to undertake for each interaction (it may be appropriate to use different levels for different purposes). A consistent and shared understanding of the term 'co-design' would help this.

The Royal Commission was clear that, given the existing system's failure to meet the needs of victim survivors of family violence, the voices of victim survivors need to be heard and should inform policy design and service delivery for the reformed system. In response, the government has taken an innovative approach to consulting with victim survivors, by establishing the Victim Survivors' Advisory Council (VSAC) (Box 1A). The government has also undertaken other work to engage with victim survivors who are not members of VSAC.

BOX 1A

The Victims Survivors' Advisory Council is an innovative way of consulting victim survivors

As part of the family violence reform, the government created the Victim Survivors' Advisory Council (VSAC) to provide advice on the different and diverse experiences of family violence from the victim survivor's perspective. Its core aims are to provide an ongoing voice for victim survivors on how the family violence system and services should be designed, contribute to and inform family violence reform work, and to provide advice on how family violence reforms will impact those people who use services.

Chaired by Rosie Batty, VSAC comprises 12 members who are victim survivors intended to represent the diverse experiences of people impacted by family violence. Membership has included representatives from the Aboriginal community, culturally and linguistically diverse communities, people with disabilities, LGBTI communities, older Victorians, and young people who are child survivors of family violence. Family Safety Victoria provides secretariat support to VSAC, including by providing a dedicated office to aid members and ensure they are supported to undertake their roles.

VSAC meets monthly and its work includes workshops, consultations, co-design approaches, presentations to government, and briefings and advice to government. Engagement activities that members have participated in include the Family Violence Steering Committee, input to the 10 Year Plan, a workshop on the review of the Specialist Family Violence Courts, a panel discussion at an international conference on Violence Against Women, the COAG National Summit on Reducing Violence against Women and their Children, and feedback on the intersection between family violence and the National Disability Insurance Scheme.

The work and commitment of VSAC and its members, and Family Safety Victoria's work in supporting them, is impressive. It has laid a strong foundation on which to build the Victorian Government's approach to ongoing, systematic consultation with victim survivors that is mindful of the trauma they have experienced.

A whole-of-government approach to consulting victim survivors, in tandem with VSAC, is needed. Going forward, it is important that agencies move towards embedding feedback from current and future victim survivors into their service delivery, to ensure continuous improvement. This should include an assessment of whether the implementation of the reforms has had a positive impact.

The government is embedding inclusivity and accessibility across the reform

The Royal Commission recognised that ‘different forms and manifestations of family violence are insufficiently recognised, and responses are not tailored to the particular circumstances and needs of diverse victims’.¹² Diversity, including overlapping or intersectional forms of diversity, can exacerbate risk or experience of family violence, and can increase barriers to reporting and to accessing and receiving appropriate services. The significant disadvantages and vulnerabilities experienced by these groups (including people with a disability, Aboriginal and Torres Strait Islander peoples, older people, the LGBTI community, people living in remote and rural areas, faith communities, and people from culturally and linguistically diverse backgrounds) need to be considered in every part of the reform, and at a whole-of-reform level.

The government has taken the right approach by seeking to embed inclusivity and accessibility into all areas of the reform, designing for diversity and intersectionality. It has engaged flexibly with diverse communities through individuals, and community and sector organisations. It has created forums to achieve this, including the Diverse Communities and Intersectionality Working Group, which comprises government, sector members and victim survivors.

As with other areas of the reform, the government now needs to make clear the overall sequence of implementation activities, when engagement will occur, and how it will be used. It also needs to map or articulate how the needs of diverse communities will be met in the transition from the existing service system to the reformed system. For example, how it will deal with gaps in the way the existing service system responds to diverse communities, to ensure that no group is left at an unfair disadvantage during the implementation process.

12 Royal Commission Into Family Violence (2016), *Volume I Summary and Recommendations*, p. 6. Also see Royal Commission Into Family Violence (2016), *Volume V Report and Recommendations*.

What should happen now

It is imperative that agencies understand how the various pieces of the reform connect at a system level and that everyone is working towards the same outcomes. The government needs to stop thinking about the reform as implementing the 227 recommendations and instead return to the desired outcomes articulated in the 10 Year Plan and determine how to achieve them. While reporting on individual recommendations provides some accountability, it should not detract from the focus on the outcomes articulated in the 10 Year Plan. These outcomes include that victim survivors—vulnerable children and families—are safe and supported to recover and thrive, and that preventing and responding to family violence is systemic and enduring.

The government could achieve this by reassessing the Royal Commission's report and recommendations through a system reform lens. Then, it would need to work out how to implement this system reform model and develop work programs and tasks that cascade from the model. The government's reporting and project management software system will not automatically remedy this issue, but it could be used as a tool to assist with this change. That said, the system will need time to bed down before it is producing useful information for planning purposes.

The government could use a program logic approach, identifying the key desired outcomes and the best options to arrive at those outcomes. It would need to call on the expertise of the non-government sector, consider how to address unmet demand, and give more weight to the needs of diverse communities. In particular, the government must more clearly map out how the new system and the implementation actions will address the specific needs of diverse communities.

Improve effectiveness by managing the reform more actively

Strong governance structures and processes are necessary to guide the implementation phase of the reform. The Victorian Government has established various governance bodies, each underpinned by the government's commitment to embed the prevention and response to family violence as a core area of government responsibility. However the effectiveness of these governance arrangements, and other structures and processes, could be improved by greater clarity around who is responsible for implementation. This means moving away from the current emphasis on acquitting the recommendations, as well as striking a balance between the desire for urgent action and a greater focus on planning for longer term outcomes.

The government could improve the governance arrangements for the reform implementation by clarifying lines of decision making and accountability, increasing coordination, and maturing the whole-of-reform risk management and reporting activities. A substantial amount of work on implementing the reform happened while governance arrangements were in their infancy. This increases risk to the success of the reforms since a lot of activity is taking place without mature oversight and risk management.

In the absence of an effective program management office, there is no-one at an operational level with a whole-of-reform purview who can bring agencies into line quickly when progress starts to slip or the reform loses direction. As a result, the government could be slow (or find it difficult) to identify and respond to risks that materialise during reform implementation.

Recent steps to strengthen governance arrangements, for example new reporting and risk policies, have increased the rigour around the reform. This is encouraging, and should continue to be developed. The government's decision (after 1 November 2017) to establish an interdepartmental committee is a step towards improved oversight, and provides an opportunity to address these issues, providing the committee meets often enough and has sufficient scope and authority. More critical again is the need for a properly functioning and capable program management office that has a whole-of-reform scope.

What we've seen

Ending family violence is increasingly embedded as a core objective of the government

The Royal Commission called for family violence to be treated as a core area of responsibility of the government and highlighted the need for a 'whole-of-government approach to stop family violence, support victims and hold perpetrators accountable',¹³

The government has responded to this in several ways, and supported its response with unprecedented investment and significant effort across the public service; for example:

- The government created Family Safety Victoria, a new government agency dedicated to ending family violence. Family Safety Victoria is an administrative

¹³ Royal Commission Into Family Violence (2016), *Volume I Summary and Recommendations*, p. 12.

office under the Department of Health and Human Services and is responsible for a range of key reform initiatives including establishing the Support and Safety Hubs and the Central Information Point.

- The government intends to create a prevention agency with dedicated and enduring funding. This agency will oversee and coordinate prevention activities within and across government, local government, community agencies and the broader community.
- Existing government departments and relevant agencies have established dedicated teams responsible for implementing the family violence reform.
- To increase the visibility of family violence in the budgetary processes, the 2017–18 State Budget included additional output performance measures for family violence prevention and the response system.

As these initiatives mature, these responses could embed the prevention and response to family violence as a core objective of the government.

Governance arrangements have been established but need clarification

Clear governance arrangements are critical to the successful implementation of any major reform. Without these, there is a significant risk that accountability will be blurred – meaning it is unclear who is ultimately responsible for a particular decision or risk. Consequently, implementation decisions may be poorly informed and possibly taken at the wrong level of government, without adequate input from relevant agencies. Alternatively, gaps in decision making and risk management may arise as groups are unsure of their responsibilities, or decisions may be made in isolation in different agencies. It is important to make sure that these arrangements are clear, in particular roles and responsibilities (including decision making arrangements), and lines of reporting and escalation.

To manage the implementation of the reform, the government established or continued a range of governance bodies, as shown in Box 2A. Establishing and supporting these bodies has been a significant undertaking. These governance arrangements are large and complex, crossing multiple agencies.

The government has established a range of governance bodies for the family violence reform

As at 1 November 2017, the following governance bodies had been established to support the implementation of the family violence reform:

- a standing sub-committee of Cabinet chaired by the Premier
- a sub-committee of the Victorian Secretaries Board
- the Family Violence Steering Committee
- Social Services Taskforce
- Whole of Victorian Government Family Violence Reform Meeting
- Industry Taskforce
- Victim Survivors' Advisory Council
- Expert Advisory Committee on Perpetrators Interventions
- Family Violence Housing Assistance Implementation Taskforce

- Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) Family Violence Working Group
- Diverse Communities and Intersectionality Working Group
- Ministerial Taskforce for the Prevention of Family Violence.

The following, already established, governance bodies support the implementation of the family violence reform:

- Indigenous Family Violence Partnership Forum
- Roadmap Implementation Ministerial Advisory Group
- Aboriginal Children's Forum
- Chief Magistrate's Family Violence Taskforce

Source: Department of Premier and Cabinet

A particular strength of the governance arrangements is the breadth of engagement. Many of the various committees have strong stakeholder representation from the sector. Efforts have been made to ensure diverse representation across the various bodies.

The government has prioritised family violence through the creation of high level governance bodies (dedicated sub-committees of the Cabinet and the Secretaries Board). These committees have met frequently and conducted considerable business.

Some aspects of these governance arrangements can be improved. It is unclear how these bodies fit together into an effective governance structure, in particular, who makes the final decisions on various types of issues, and which decision can be made at which level (that is, is this decision made at an operational level or a strategic level within government, or by Cabinet?). The terms of reference of many of these groups are underdeveloped and do not provide clarity around the governance arrangements. According to the terms of reference for these governance bodies, most are focused on providing advice and sharing information. The bodies tasked with overseeing the reform are largely asked to endorse activities without being provided options to choose from, with associated analysis of risks, benefits and costs.

During 2016 and through to March 2017, there was a Whole of Victorian Government Family Violence Reform Meeting, consisting of representatives from most of the agencies responsible for implementation actions. While operating as a good forum for information sharing and relationship building, the Reform Meeting did not function as a decision making forum. It was therefore not able to make strategic decisions about aspects of the planning and prioritisation of implementation actions, including which critical decisions required escalation to the Victorian Secretaries Board (VSB) or Cabinet sub-committees.

These issues with governance are not surprising in such a large, complex implementation. Interagency governance arrangements are particularly challenging, and it is to be expected that these governance arrangements will be refined and changed as the government learns more about whether the current arrangements are operating as intended and as required.

In December 2017, the government advised its intention to establish an interdepartmental committee to provide an operational whole-of-reform governance function. It is intended that this interdepartmental committee will lead on issues around interdependencies and dependencies, milestones and sequencing, governance, and risk management. This committee needs to have sufficient authority and scope over whole-of-reform activity, as well as agency level and project activity, so that it can regularly make decisions and escalate risks to the VSB sub-committee.

The introduction of an interdepartmental committee is a good opportunity for government to refine its governance arrangements more broadly to address existing issues. In particular, it needs to make sure that groups are clear about which decisions and risks are their responsibility.

Whole-of-reform risk management processes need to be improved

Implementation of the family violence reform will inevitably encounter some risks and has a high inherent risk profile as discussed in Box 2B. Given this, whole-of-reform risk management should be one of the government's highest priorities.

While risk management is currently happening within each agency to varying degrees, the whole-of-reform risk management is underdeveloped. Decision makers do not currently have a clear view of the overall risk profile for the whole of the reform.

The risk profile of the reform is high

Whole-of-government programs have high risk profiles. Many risks are complicated or have a greater likelihood of occurring because departments are working outside their usual areas of operation and attempting to collaborate in a different way. Many of the key risks do not sit within just one department, and risks that occur for particular projects are likely to be repeated in other areas of work. This increases the importance of a central risk register which would improve the government's ability to take appropriate and timely mitigating actions.

A whole-of-reform risk management approach is more than the sum of the individual project or program risks. It also considers interdependencies between project risks. Identification and management of these interdependent risks can avoid unnecessary delays, additional costs, and decreases in efficiency and effectiveness.¹⁴

The family violence reform also has a heightened risk profile because:

- it is an unprecedented, world leading reform that requires new ways of working together across government
- the level of investment by government is significant
- public interest in the reform is very high
- the reform is complex and requires significant change
- the need for change is urgent.

14 The importance of consideration of interdependent project risks is examined in the Victorian Auditor-General's Office 2016 report, *High Value High Risk 2016-17: Delivering HVHR projects*.

Following earlier preparatory work, an initial interagency risk register was developed in late 2017 through workshops facilitated by the Victorian Managed Insurance Authority. This could be used to manage whole-of-reform risks, but at this stage this work is relatively immature and needs to be strengthened. While the risk register is robust and identifies the most pressing risks, it is not clear how joint accountability for the reform risks is being managed. When all involved are responsible, there is a danger that no-one will take ultimate responsibility when a risk becomes critical. Active management of this is essential and ownership of risks needs to be clarified to ensure accountability. At a basic level, to be effective this risk register also needs to be clearer about who holds the risk and for agencies that hold mitigation tasks, the timeframes for implementing these tasks.

The first round of reporting on the risk register indicates that risks are not yet being actively managed.¹⁵ For example, the risk register identifies an extreme risk, which means (according to the risk register's rules) that decision makers should consider stopping implementation. However, as at 1 November, there was no evidence the VSB sub-committee (the appropriate governance body) had met to consider this risk, and it is not reflected in the out-of-session reporting to the VSB sub-committee. This work must mature soon if this complex reform is to be properly managed and led.

Whole-of-reform reporting is improving but does not yet show the actual progress of implementation

The current reporting arrangements at a whole-of-reform level are still at an early stage but are developing. The government has recognised the importance of having rigorous whole-of-reform reporting, but so far there is no robust indication of progress of implementation.

Regular reporting was introduced towards the end of the monitoring period.¹⁶ Prior to this, there was very little information that could be compared across cycles to allow proper monitoring or to reflect progress at an agency, program or project level. This is concerning because a large amount of work was undertaken, and significant funding invested, before sufficient reporting and monitoring was in place.

A new reporting system – the Enterprise Reporting and Project Management System (ERPM) – was introduced in October 2017. The ERPM is being used to produce reports to the VSB sub-committee, which meets approximately monthly. These reports provide a high level traffic light assessment of each project's overall risk, made up of each project's budget, schedule, scope, risks and issues. Agencies also are required to provide 'project commentary', and to report to the VSB sub-committee via a dedicated paper if any projects receive an overall 'high risk' rating, which is a good risk management strategy.

These reports have the potential to provide the data to support reform oversight, but at this stage, they cannot do this because the data is inconsistent and incomplete. There needs to be whole-of-reform analysis, and the reports do not cover the whole of the reform.

¹⁵ The risk register was provided in October 2017.

¹⁶ At 1 November 2017, it was not possible to validate or undertake analysis of this reporting.

At this stage, there is little assurance that the data being entered by agencies is being checked centrally to ensure consistency. Currently, reports by agencies vary in detail and quality, and are not consistent. Training in the ERPM system has been provided, but ongoing central coordination of agencies' input is important to ensure the quality of contributions to the system. For example, in mid-2017, agencies were required to provide internal actions (also called milestones) for each recommendation, and report on these every six months.¹⁷ These milestones are of varying quality and provide limited insight into progress. There was limited central review of these milestones to provide feedback or improve the quality, and while there were improvements made, quality still remains very poor. This demonstrates the need for a program management office for the reform (discussed later).

Better analysis of the agencies' reports is also required. As they stand, the reports do not consider how the projects impact each other or reflect the significance of each project to the reform. A project that has a medium risk rating at any time might be more critical to the reform than a project that has a high risk rating because it has other projects depending on it or a greater impact on outcomes, but the current report format does not capture this. A program management office could provide this level of analysis. The team currently preparing these reports to the VSB sub-committee plays a secretariat role rather than a full program management office role.

The projects in the ERPM do not cover the whole of the reform because there are areas of the reform that are not captured in a project. The recommendations that are not captured in project delivery are defined as 'standard business activity'. The level of controls and governance requirements for 'standard business activity' recommendations are less than for projects, even though many such recommendations are complex and high risk. For example, funding reform, a highly complex activity, was classified as 'standard business activity'. Because activities are being managed as 'standard business activity' rather than a project, there is less scrutiny over them. The government has advised that, going forward, it intends to report more frequently on these recommendations, which will increase accountability and oversight.

The government's key public reporting process is the public acquittal website¹⁸, but this reporting approach cannot provide a proper picture of progress, and has some significant shortcomings. It is also not being updated in a timely manner. The public acquittal, which was intended to be updated six monthly, has only been updated once since its introduction in November 2016.

The public acquittal website indicates whether each of the 227 recommendations is 'not started', 'in progress' or 'implemented'. The government has designated 63 recommendations as 'implemented', but without the full assessment of dependencies (which is still in progress, as discussed in chapter 2) the government cannot have full assurance that all these recommendations are complete to a point that they can contribute to outcomes.

17 As per the government's Whole of Victorian Government Family Violence Reporting Policy, this frequency may change to quarterly.

18 Source: <https://www.vic.gov.au/familyviolence/recommendations.html>

Further, reporting by recommendation does not provide enough information for reform progress to be measured and decision makers to effectively monitor the reform. Current public reporting is based on the number of recommendations completed. This does not allow proper demonstration and assessment of progress of the reform, because the recommendations vary in size, complexity and impact, and do not show the full scope of the work required. For example, recommendation 37 ('Support and Safety Hubs in the 17 Department of Health and Human Services regions'¹⁹) is clearly more complex and will require more funding than recommendation 110 ('Encourage industry Ombudsman to publicise their dispute resolution processes to assist victims of family violence').²⁰ While both are important, their scope is different: recommendation 37 will require a step change in operating practices for a number of service delivery agencies and, if successful, will have a far greater impact. It is not realistic to measure progress by the number of recommendations completed, yet current public reporting gives equal weight to the two recommendations.

Central review and coordination is needed

Given agencies operate separately in most reform implementation activities, the government must do a lot of work to ensure effective central coordination and review. There is an urgent need for a program management office to be established to manage the reform program at the whole-of-government level, coordinate agencies' input, and ensure input meets consistent minimum standards. This lack of a central coordinating agency is a major deficit that needs to be addressed if the reform is to be successful in producing desired outcomes.

19 The recommendation's full wording is, 'The Victorian Government introduce Support and Safety Hubs in each of the State's 17 Department of Health and Human Services regions'.

20 The recommendation's full wording is, 'The Victorian Government encourage the Victorian Energy and Water Ombudsman and the Commonwealth Financial Services Ombudsman and Telecommunications Ombudsman to publicise the availability of their dispute-resolution processes to help victims of family violence resolve disputes with service providers in relation to debts and liabilities incurred in the context of family violence'.

The role of a program management office

Large programs require a different style of management than small discrete or simple projects. One way to reduce the risks associated with implementation and provide the necessary support to decision makers when coordinating a number of projects is to establish a central program management office.

An effective program management office is responsible for:

- supporting the setup of programs, scopes of work, schedules, cost estimates, and budgets
- acting as a central point for progress reports from individual work streams, allowing them to gain perspectives on best practice
- providing an objective source of program information and reporting, including lines of accountability
- helping to reinforce robust and well understood project management protocols at a project level
- interrogating reporting received to verify the accuracy of data provided and ensure its relevance to the success of the program
- increasing understanding and decreasing uncertainty for stakeholders as it consistently analyses and prioritises reports received before further circulation.

Adapted from Barkley, B 2011, Government program management, McGraw-Hill Education.

The Department of Premier and Cabinet's Family Violence Branch undertakes some coordination activities. For example, it coordinates the whole-of-government reporting and provided the Whole of Victorian Government Family Violence Reporting Policy, but it does not undertake the remaining program management activities required of a central coordination office, as described in Box 2C. Its role in managing the whole-of-government reporting is largely secretarial. Further work is needed to ensure the reporting is being used strategically and there is sufficient quality assurance of agencies' input to the reporting system.

What should happen now

The government needs to be confident that work across the reform (including decision making) is coordinated and well managed, and that the right decisions are being made by the right people at the right time, based on targeted, reliable, and useful information. To do this:

- A program management office must be established, with the right skill set, scope, authorisation and accountability. This could be set up under either Family Safety Victoria, the Department of Premier and Cabinet, or another agency. The current office within the Department of Premier and Cabinet fulfils some requirements, but is not sufficient
- The interdepartmental committee needs to be provided with the scope and authorisation to support whole-of-reform governance. This committee would likely have representation from all relevant agencies at the executive director level.

Improve effectiveness by making sure the right things are done in the right order, in the best way

Changing a system that supports vulnerable people during a crisis is a high risk process. The family violence reform is extraordinarily ambitious and complex, and its implementation presents significant challenges. Victoria's existing response to family violence, including its policies and service responses, were already highly complex before the Royal Commission, involving multiple government and non-government agencies and many different parts of government.

Effective planning is therefore critical to ensure the success of the reform, but to date, critical planning activities have not been completed, in particular, the development of a satisfactory implementation plan. The planning activity undertaken at the whole-of-reform level thus far cannot yet guide reform implementation or allow proper progress monitoring, because it does not yet clearly outline how implementation will occur. Whole-of-reform timelines, budgets and quality expectations need to be more detailed and well communicated.

If urgent planning is not undertaken, implementation of the reform may fail to achieve the outcomes and ambitions of the Royal Commission and the government's 10 Year Plan. There has been significant focus and energy devoted to urgent implementation activities, but as the reforms move beyond 18 months since the Royal Commission's report, the government needs to build the details and better set the foundations for long term reform. Some of this work is underway and needs to be a focus in 2018.

What we've seen

The government has identified activities it intends to do to implement the reform

In publications, including the 10 Year Plan, the government has identified various activities it intends to undertake as part of the reform. These activities vary in scope, size and complexity. Some of the major activities the government has identified include:

- prevention activities, including gender equality and prevention strategies, and roll out of Respectful Relationships education as part of the Victorian curriculum
- establishing Support and Safety Hubs across Victoria
- providing safe and stable housing to people affected by family violence
- expanding specialist family violence courts
- expanding perpetrator interventions
- building the capacity and capability of the workforce
- redeveloping the Family Violence Risk Assessment Management Framework
- sharing information more effectively, including establishing a statewide Central Information Point.²¹

²¹ Based on the iconic initiatives from the Rolling Action Plan.

As well, many activities of smaller scope, size and complexity are outlined across various publications. Most activities are described at a high level, although some activities (especially those that are smaller and less complex) are described in detail or specifically.

The government has carried out a large amount of activity to date

The government has carried out a significant amount of activity under the auspices of the reform, as outlined on the following pages.

Laying some foundations – What has happened so far

Government has made its intentions clear:

- Budget allocation of \$2.4billion.
- Committed to implement all of the Royal Commission's recommendations.

Putting Family Violence at the centre

- Family Violence and Service Delivery Reform Unit within Department of Premier and Cabinet (disbanded as of 1 July 2017, with the commencement of the Family Violence Branch from that date).
- Family Safety Victoria established.
- Specialist Family Violence units in Departments.
- Introduction of Family Violence Policies.
- Family Violence leave introduced for all public servants.

Foundational legislation and regulation

- Appointment of Family Violence Implementation Monitor and establishment of office.
- Amendment made to *Family Violence Protection Act 2008*.
- Repealed the unproclaimed provisions of the *Family Violence Protection Amendment Act 2014*.
- Include consideration of Family Violence in review of the *Liquor Control Reform Act 1998*.
- Amendment made to section 26 of the *Public Health and Wellbeing Act 2008*.
- Amendment made to the *Infringements Act 2006*.

Engaging with victim survivors and diverse communities

- Victim Survivors Advisory Council (VSAC). Establishing this committee has been an innovative approach to putting victim survivors at the heart of the reform.
 - Family Violence Steering committee – with wide membership including many diverse community groups such as the elderly, regional and rural, people with disabilities, people from culturally and linguistically diverse communities.
 - Indigenous Family Violence Partnership Forum.
 - Aboriginal Children's forum.
 - Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) Family Violence Working group.
 - Diverse Communities and Intersectionality Working Group.
-

Consultation with sector and community

- Series of open regional forums on the Support and Safety Hubs.
- Nine focus groups with service users to inform the development of statewide concept for Hubs.
- Dedicated workstream within the Hubs project team to inform branding, physical design and service delivery through one on one discussions with service users.
- Series of regional workshops to develop the outcomes framework included in the 10 Year Plan.
- Expert Advisory Committee on Perpetrator Interventions.

Cross Agency Working

- Dedicated subcommittee of the Victorian Secretaries Board.
- Social Services Taskforce.
- Whole of Victorian Government Family Violence Reform Meeting.
- Industry Taskforce.
- Family Violence Housing Assistance Taskforce.
- Chief Magistrate's Family Violence Taskforce.
- Ministerial Taskforce for the Prevention of Family Violence.
- Roadmap Implementation Ministerial Advisory Group.

Strategies and policies developed

- *Ending Family Violence- Victoria's plan for Change (10 Year Plan).*
- *Safe and Strong – A Victorian Gender Equality Strategy.*
- *Family Violence Rolling Action Plan 2017-2020.*
- *Free from Violence: Victoria's strategy to prevent family violence and all forms of violence against women.*



Ending Family Violence – Victoria's plan for Change (10 Year Plan)



Safe and Strong – A Victorian Gender Equality Strategy



Family Violence Rolling Action Plan 2017-2020



Free from Violence: Victoria's strategy to prevent family violence and all forms of violence against women

The government needs to fully identify how different parts of the reform impact each other

The government has done some preliminary work to identify the dependencies between different elements of the reform. However, this work has not been completed and the government cannot have confidence that it is managing all the dependencies between different parts of the reform. Despite this, the government has done significant work and made significant investment. This has introduced risks and could have significant impacts on the effectiveness and the efficiency of the reform. See Box 3A for discussion of the importance of identifying dependencies.

Dependencies need to be urgently identified

Identifying dependencies is a common part of implementation planning. In its better practice guide, *Successful implementation of policy initiatives*, the Australian National Audit Office identifies that ‘it is essential that critical dependencies are understood’²², and suggests that dependencies with other policies or activities be outlined in an implementation plan.²³ The Victorian Auditor-General’s Office has highlighted the importance of identifying and monitoring interdependent project risks in its audit *High Value High Risk 2016–17: Delivering HVHR projects*.²⁴

Consideration of dependencies is necessary to determine which pieces of work need to be done together, and in what order certain activities should be done. It is also critical to determine whether something has been completed, and whether it has been implemented effectively, because its effectiveness is partly determined by how well it supports other elements of the program and

contributes to the achievement of outcomes (Appendix A). Progressing implementation without fully understanding dependencies could lead to poor outcomes, because dependent activities may not be coordinated or sequenced appropriately, and new elements could be added to the system that do not work well with existing elements.

While some activities may be discrete and not require the same consideration of dependencies, in a multi-agency reform, the level of complexity and dependencies is not always apparent without specific operational expertise. Agencies must work together to distinguish these standalone areas of work from the interdependent areas.

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- 22 Australian National Audit Office 2014, *Successful implementation of policy initiatives*, p. 45.
 - 23 Australian National Audit Office 2014, *Successful implementation of policy initiatives*, p. 47.
 - 24 Victorian Auditor-General’s Office 2016, *High Value High Risk 2016–17: Delivering HVHR projects*, pp. 39–40.

As an initial step, in June 2016, the Department of Premier and Cabinet coordinated the preparation of draft Recommendation Implementation Plans, which involved agencies identifying some key dependencies. This work was high level, did not cover all of the reform, and did not subsequently form the basis of a full implementation plan.

After a significant gap and substantial activity, in mid to late 2017, government agencies started to clearly document dependencies among their allocated work streams, as well as among the work allocated to other agencies. Family Safety Victoria has identified dependencies between all the elements of the reform for which it is responsible. It has also begun to identify where there are dependencies with the work of the Department of Health and Human Services, the Department of Justice and Regulation, the Department of Premier and Cabinet, the Department of Treasury and Finance, Courts, and Victoria Police.

The recent work of agencies to identify dependencies is encouraging and should be progressed to fully identify all the dependencies of the reform. All relevant agencies should participate in this planning activity. This can then inform a clear map of whole-of-system reform and allow key decisions around timing, sequencing and priorities. This should be a top priority.

The government needs to be confident it is doing things in the right order

The reform is highly complex, with many different parts and a long timeframe. Several elements are urgent, and there are many sequencing issues. Activities need to be implemented in a carefully sequenced way, so that the system is ready to support people effectively. As such, it is critical that there is confidence that:

- activities are prioritised appropriately, to ensure the limited resources are directed to the most pressing activities
- for interconnecting elements, activities are sequenced and scheduled appropriately so that things are done in the right order
- the impact of implementation on other activities downstream has been considered and responses have been developed—for example, government has anticipated increased reporting of family violence as a result of awareness and prevention activities have been considered and corresponding plans developed and executed
- realistic lead times are identified.

Once this is done and a schedule is agreed, it must be clearly documented so that all relevant agencies can scrutinise and follow the schedule, and track progress against it. Determining the right things, in the right order, in the right way is not static. It will be a dynamic process informed by continuous learning and evolution of knowledge, capability processes, and coordination.

The work at the moment to prioritise, sequence and schedule is still insufficient. There was some initial consideration of sequencing issues in 2016, but this was not conducted at a whole-of-reform level, and as at 1 November 2017, did not appear to have been advanced. The government also started drafting a family violence master schedule in November 2016, but it does not appear to be being used or reviewed, and tasks included are at a high level, which makes it difficult to determine whether they have been scheduled properly and to track progress. As discussed in the Australian Government's *Guide to Implementation Planning*²⁵, 'an overarching implementation schedule, which integrates the key activities of all the participating departments and agencies and their sequence, together with any interdependencies, is a minimum requirement of cross-portfolio implementation plans. Typically, this is the document against which progress will be monitored and assessed'.

The government has commenced a lot of activity, without the aid of a live and up-to-date overarching schedule and without necessarily understanding the full impact this work could have on the system or on implementation of the rest of the reform. This is highly risky.

The main indication of prioritisation to date comes from the budget process, since this demonstrates which elements of the reform will be funded first, but it is not clear that the budget bids were underpinned by a thorough consideration of whole-of-reform prioritisation.

There was also some indication of sequencing and prioritisation in the *Family Violence Rolling Action Plan 2017–2020* (the Rolling Action Plan).²⁶ However, this was also not based on sufficient whole-of-government work, and is too high level to guide implementation and measure progress.

More work can and needs to be done on sequencing and scheduling. Family Safety Victoria's work on mapping dependencies is a useful tool and should be used as input for better consideration of sequencing and scheduling.

The government needs to better articulate what it is going to do

The government has not developed a full implementation plan for the reform that is sufficiently detailed to guide implementation. It needs to do so urgently.

25 Australian Government Department of Prime Minister and Cabinet 2017, *Guide to Implementation Planning*, Cabinet Implementation Unit, Canberra, p. 10.

26 There are some milestones presented in relation to iconic initiatives (p. ix) that could represent some sequencing, and there are funding amounts in relation to some activities that could indicate prioritisation.

An implementation plan is a vital practical tool

An implementation plan is a practical tool to direct what is happening and when, who is doing what, and the associated risks. It should provide a structured approach for implementing an initiative or program. It plays many roles, including:

- guiding those responsible for implementation to implement activities effectively and at the right time
- keeping government accountable for what it has committed to delivering, including activities and outcomes
- allowing the reform's senior leadership to monitor the implementation effectively and manage its risks, including identifying major risks before they materialise, deciding whether delays or changes are reasonable or low impact, and deciding whether intervention is necessary
- allowing oversight bodies to monitor progress against time, budget and quality expectations
- ensuring all relevant agencies have a shared understanding of the reform, including the desired final system and how to get there, so that their agency-level plans align with those of other agencies
- allowing the non-government sector to conduct its strategic, business, workforce, and capacity building planning with the reform in mind, including expected system changes.

An implementation plan does not have to be a single document, but it does need to be the culmination of planning activities, and to be informed by agencies coming together to provide input and determine the

implementation approach. If the implementation plan is spread across a few documents, it is essential that they all align and can be easily referenced. As a minimum, the plan should clearly set out²⁷:

- a realistic implementation schedule
- milestones that represent key stages in the achievement of outcomes
- sequencing of activities
- the allocation of responsibility across agencies
- deliverables and key activities
- a risk management approach
- resourcing and capability
- key decision points
- key performance indicators.

Activity should be regularly referenced against the plan, and the plan should be adjusted and updated regularly using a clearly controlled process. It should reflect the current state, within reason. If adopting an Agile approach to project management, planning is a key step but can be carried out at the same time as designing, building and testing. Agile principles work best at a project level because they champion delivering iteratively, in small stages and with the ability to react to change or failure. The small multidisciplinary teams and constant face-to-face interactions favoured by Agile are difficult tools for scheduling the key components of a large reform but can be used to guide the development of discrete solutions and services.²⁸

27 This list is based on the Department of the Prime Minister and Cabinet, Cabinet Implementation Unit's 2014 *Guide to Implementation Planning*.

28 Adapted from Agile Delivery, <https://www.gov.uk/service-manual/agile-delivery>, accessed 9 February 2018.

The government has produced several publications to communicate its intentions, including:

- *Ending Family Violence: Victoria's Plan for Change* (the 10 Year Plan), released in November 2016. This is one of the two official Implementation Plan documents under section 5 of the *Family Violence Reform Implementation Monitor Act 2016* (the Act)
- *Family Violence Rolling Action Plan 2017–2020* (the Rolling Action Plan), released in May 2017
- *Safe and strong: A Victorian gender equality strategy*, released in December 2016
- *Free from Violence: Victoria's prevention strategy*, released in May 2017.

These are important and useful foundational documents, but they do not contain enough information to form an implementation plan and guide implementation. A brief and general approach is appropriate for a high level vision or strategy document, but insufficient for an implementation plan as outlined in Box 3B. For example, the various documents do not contain enough detailed information about timeframes and milestones for an implementation plan, as discussed in Box 3C. These documents anticipate further detailed planning and project management work to sit underneath them that has not yet been articulated elsewhere.

Reform timelines need to be more detailed and useful

Across the planning documents, there is not enough information on timelines to support implementation.

There are some timeframes and milestones, but they are too high level. For example, the Rolling Action Plan has a visual representation of milestones and timeframes for each of its seven iconic initiatives. However, the milestones are high level and imprecise—they cannot be used to map out delivery because they do not adequately reflect the work required for implementation. These milestones do not provide enough detail to measure progress, or reflect the work required.

The public acquittal website²⁹ shows a final expected completion date for each Royal Commission recommendation, plus some intermediate dates for some recommendations. While this provides some idea of timeframes, it does not contain sufficient detail to guide implementation, especially for complex recommendations such as the Support and Safety Hubs and Central Information Point. For some smaller programs of work there are no milestones, deliverables or schedules.

Where there are timeframes and milestones, there is little articulation of or guidance for the things that need to happen for milestones to be met, the consequences of delays, or when outputs or outcomes may be expected.

For some projects, agencies have developed more targeted and specific milestones in project documentation. These need to be rolled up into a program-level plan, which would then enable decision makers to assess whether the timeframes are accurate and robust as a whole, taking into consideration the relevant dependencies.

Agencies need to work together to agree on the critical timeframes and milestones for the whole of the reform. This will enable the sector and the community to plan their involvement and understand when to expect outcomes to start to change.

The relevant agencies have also developed milestones for each recommendation. This work should be built on, since these milestones are not sufficient to support monitoring.

The government also needs to move on from the current recommendation-by-recommendation approach and articulate more meaningful and useful milestones against programs of work.

29 The public acquittal website (<https://www.vic.gov.au/familyviolence/recommendations.html>) is a government website listing every recommendation in the Royal Commission's report. It shows progress of each recommendation as either 'not started', 'in progress' or 'implemented'.

The other publication the government has said comprises the official implementation plan under the Act is the public acquittal website. However, the public acquittal website does not contain the structure or level of detail expected of an implementation plan. It contains some limited narrative under the headings 'What we are doing' and 'Where we are up to', but this is high level, difficult to monitor against, and does not contain some of the essential elements outlined in Box 3B. It is a public status update on the recommendations and does not show how the reform activities fit together, the order in which they must be done, or what they ultimately create in terms of system reform.

The Department of Premier and Cabinet has advised that it believes its new reporting system, the Enterprise Reporting and Project Management System (ERPM), fulfils the elements of an implementation plan as described in Box 3B. This system was introduced in October 2017 and has greatly enhanced the potential for effective monitoring and reporting. Agencies are expected to use this to manage their projects on a day-to-day basis. It has the capacity to provide status reporting, schedule management, risk and issue information, and budget information, and therefore could support essential planning and monitoring activities that have not yet been done, such as critical path planning. However, while the ERPM can help provide data for planning activities, it is not a substitute for them, and as at 1 November 2017 and since then, there are no indications that it has been used for planning activities.

Agencies have been working to create project plans. For example, Family Safety Victoria has been working to create project plans for the Support and Safety Hubs. This work is necessary. However, individual project plans do not address the lack of a whole-of-reform plan or show how the project fits into a program of work.³⁰

The government needs to be more transparent about changes to its plans

With a reform of this size, scope, complexity and timeframe, it is expected that there will be many changes to plans. There are still unknown elements and as relevant agencies gain knowledge and experience about a particular project or program, or as priorities shift, changes should be made. These changes should be made following appropriate processes, and the planning documentation should be changed to reflect this. Transparency and confidence will be enhanced when changes are explained.

The government has made a number of changes to what it intends to do. It needs to be more transparent about such decisions. The government should also be briefing and reporting on why it is making these changes, how it arrived at the changed approach, and what impact the change (such as a delay) will have. However, there are instances where government is not doing this. For example, the government changed the dates on the public acquittal website for 96 recommendations in November 2017, most commonly adding a nine-month delay. As at the completion of this report (late March 2018) there is no acknowledgement of these changes on the public website, or explanation for the altered timeframes or information on how the extra time will be used.

30 Australian National Audit Office 2014, *Successful implementation of policy initiatives*, citing chief executive interviews, p. 45.

What should happen now

To maximise the reform's chances of success, the government needs to undertake more rigorous planning activities. Ultimately, the government should have confidence that it is doing the right things, in the right order, in the best way. Resources need to be focused on better planning of foundational activities so that the foundations are securely laid in the coming months. It is not possible to carry on delivering services, implementing reforms and planning all at the same time in a climate of increasing demand. To prioritise critical planning work, the government will probably have to pause or slow down some areas of the reform. Pausing or slowing down cannot be avoided by providing additional resources, because planning work requires input from key stakeholders whose time is finite. With solid foundations, the government can be more agile in its implementation.

There are a number of ways the government could approach its planning work, such as:

- undertaking collaborative planning activities within government, including identifying major pieces of the reform, building on dependency assessment work done so far by Family Safety Victoria, determining implementation priorities, and sequencing activities
- expanding and enhancing the whole-of-reform reporting framework introduced in 2017. The quality of the reporting outputs will depend on the quality, consistency and validity of the system data entered into the system by individual agencies
- further developing its risk management approach to include timing, dependency and critical path risks.

Documenting this in a whole-of-reform implementation plan or, at a minimum, an overall implementation schedule, is also critical.

When undertaking this planning, using a system thinking approach, the government needs to:

- recognise that this work is ongoing and iterative
- examine and agree on its approach to addressing implementation issues
- consider how to best give people advance notice of what the government is going to do and when, and who is involved
- continue to embed inclusion and accessibility and address the needs of diverse communities.

Next steps

This report has deliberately focused on broad themes, and the opportunities to improve the chances of success for the reforms. I consider the period since the tabling of the Royal Commission report to be one of establishment and laying of foundations.

Efforts to engage the community in the reform have been significant and have indeed established a groundswell of support for the reforms. This includes engagement and support of victim survivors, and the diverse areas of the community considered by the Royal Commission.

The overall government investment in these reforms is unprecedented, as is the scope of work being pursued. As has often been said, much of the work is groundbreaking. The need for urgent action on family violence is clear: the physical and mental toll is unacceptable at both an individual and community level.

The scale of the task, the size of the investment, and the degree of public commitment all add to the risks of the undertaking. The world is watching to see what Victoria can achieve.

I intend to focus my next report on several other priority themes. I expect to be able to report on the effectiveness of implementation under these themes, and the impact on diverse communities. However, until more work has been done to identify dependencies, sequencing, and expected measurable outcomes, I will still not be able to comment with confidence on progress of the overall reform.

The opportunity remains to advance the work on planning, to build on a systemic approach, and to strengthen the governance of the reforms. It is now critical that this work occurs and advances rapidly. We are moving beyond the foundation phase.

These actions will build confidence that the reforms are likely to succeed, and that the resources dedicated to the task are likely to produce the best possible outcomes for victim survivors, to break the cycle of family violence.

I will keenly monitor the areas needing development that I have nominated in this 2017 report. They are critical to success, and to being able to demonstrate progress.

Assessment of recommendations listed as ‘implemented’ on the public acquittal website

A key part of implementation planning is understanding how to deliver the required outcomes and outputs and determining when a task is complete. Determining completion may be as simple as identifying that certain discrete tasks have been undertaken. It may be a more complex decision if the action being completed is part of a sequence, is something that other parts of the reform are dependent on, or is a key driver of benefits.

Ideally for a reform of this size and complexity, the implementation planning would have clearly mapped the ways in which milestones and outcomes for work programs are linked to the individual recommendations. This would guard against the criticism that recommendations have been ignored or omitted. It would also provide the government with the opportunity to describe the rationale for any departures from the wording of the recommendation. Each lead agency, using its expertise in service delivery, would provide input into the plan on the steps and actions needed to implement the intention of the Royal Commission. Deciding when an individual recommendation is considered complete would then be a relatively simple process of looking at the stage on the implementation plan, particularly if consistent agreed completion principles have also been applied.

Instead, the government has taken a recommendation-by-recommendation approach to implementing and reporting publicly on progress of the implementation. As discussed in the body of the report, this representation of progress is potentially misleading because overall progress is shown on the public acquittal website by a simple graphic with three possible states for each recommendation: ‘not started’, ‘in progress’ and ‘implemented’. This graphical representation suggests that the completion of each recommendation is an equal step in the overall reform.

The first version of the public acquittal website was published in November 2016. At that stage, 10 recommendations were categorised as complete, prior to the development of central completion principles upon which to make that assessment. The Monitor expressed concern that there was a risk that recommendations would be categorised as complete when in fact they were not. This becomes an issue in cases where other reform activities depend on the recommendation; if it is not fully complete, there will be adverse impacts on the effectiveness of the reform. It would also raise community expectations of the level of change that could be expected in victim survivors’ experience of the system.

To address these concerns, the website update included the wording ‘subject to the Monitor’s approval’ against each recommendation categorised as complete. The governing legislation does not require the Monitor to approve the completion of recommendations. Under the legislation, the Monitor may comment on the progress of implementation of the Royal Commission’s recommendations. In assessing progress, the Monitor has considered whether the implementation of a recommendation has fulfilled the intention and wording of the Royal Commission, and can reasonably be expected to deliver the required outcomes.

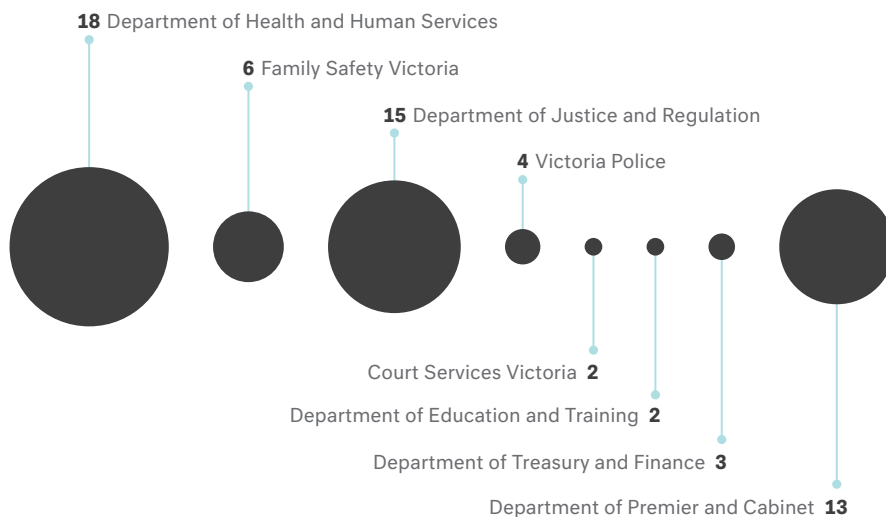
As part of the whole-of-government family violence new reporting policy³¹, the agencies developed some completion principles, and these were used to help agencies assess whether a recommendation was complete or not.

At the time of this report, there were still some outstanding queries and issues over some of the recommendations initially categorised (in November 2016) as ‘finished’.

Given issues raised in this report, it is not possible to assert with confidence whether an individual recommendation is complete unless it is clearly a discrete, standalone recommendation that does not have interdependencies with other recommendations. This would include recommendations such as amending internal codes of practice, writing letters to external parties, or passing amendments to legislation.

When the website was updated in November 2017, another 54 recommendations were categorised as ‘implemented’³² and one recommendation previously categorised as ‘finished’ was re-categorised as ‘in progress’.³³ These additional recommendations had been assessed against the implementation principles by the responsible lead agency.³⁴ There has been insufficient time for the Monitor to assess all these recommendations.

FIGURE 1: NUMBER OF COMPLETED RECOMMENDATIONS ALLOCATED TO AGENCIES BASED ON PUBLIC ACQUITTAL WEBSITE INFORMATION (AS AT NOVEMBER 2017)



The following high level analysis attempts to provide some additional information on progress. It distinguishes between those recommendations that are discrete and standalone and those that are complex and interrelated. Complex interrelated recommendations are more likely to have a serious adverse impact on outcomes if they are prematurely considered to be complete.

31 Approved by the Victorian Secretaries Board.

32 The first version of the public acquittal website used the categories of ‘Not started’, ‘In progress’ and ‘Finished’. The second version, updated in November 2017, used the categories of ‘In progress’ and ‘Implemented’.

33 Namely recommendation 201 on the need to reflect the voices of victims in policy development and service delivery.

34 Between updates to the website, some recommendations were re-allocated to different lead agencies.

TABLE 1: MONITOR'S ANALYSIS OF RECOMMENDATIONS AS PER THE PUBLIC ACQUITTAL (31ST JANUARY 2018)

Recommendations considered discrete, standalone	29	Recommendations considered complex, interrelated	8	Other recommendations	26
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Eight recommendations appear to be so complex and interrelated that it is unlikely they could ever be categorised as complete with confidence, in the absence of a whole-of-reform implementation plan. These recommendations also include instances where the implementation actions taken appear to depart from the wording and intent of the Royal Commission recommendation.

The Monitor needs more time to assess those recommendations categorised as 'other'. At the time of reporting, it is not possible to confidently state whether any of these recommendations are discrete and standalone. Further work needs to be done between agencies to establish that there are no interdependencies that might affect whether these recommendations are complete or not.

Twenty-nine recommendations have been initially assessed as discrete and standalone. Of these, 28 appear to be complete, and one (recommendation 84) incomplete. In relation to recommendation 84 the Director of Public Prosecutions is actively seeking to identify an appropriate case for a guideline judgment. While a case has not yet been identified, the process is ongoing.

TABLE 2: MONITOR'S ANALYSIS OF 'IMPLEMENTED' RECOMMENDATIONS AS PER THE PUBLIC ACQUITTAL (31ST JANUARY 2018) – FULL RECOMMENDATION TEXT

Recommendations considered discrete, standalone

Recommendation 78

The Victorian Government repeal the unproclaimed provisions of the *Family Violence Protection Amendment Act 2014* (Vic) providing for interim family violence intervention orders with an automatic finalisation condition (self-executing orders) [within 12 months].

Recommendation 83

The Sentencing Advisory Council report on the desirability of and methods for accommodating 'swift and certain justice' approaches to family violence offenders in Victoria's sentencing regime [within 12 months].

Recommendation 84

The Director of Public Prosecutions consider identifying a suitable case in which to seek a guideline judgment from the Court of Appeal on sentencing for family violence offences [within two years].

Recommendation 93

The Victorian Government ensure that the terms of reference of the current review of the *Liquor Control Reform Act 1998* (Vic) consider family violence and alcohol-related harms. The review should involve consultation with people who have expertise in the interrelationship between family violence and alcohol use.

Recommendation 94

The Victorian Government amend section 26 of the *Public Health and Wellbeing Act 2008* (Vic)—which requires that councils prepare a municipal public health and wellbeing plan—to require councils to report on the measures the council proposes to take to reduce family violence and respond to the needs of victims. Alternatively, the Victorian Government could amend section 125 of the *Local Government Act 1989* (Vic)—which requires each council to prepare a council plan—to require councils to include these measures in their council plan (rather than their health and wellbeing plans) [within 12 months].

Recommendation 98

The Victorian Government fund the establishment of specialist family violence advisor positions to be located in major mental health and drug and alcohol services. The advisors' expertise should be available to practitioners in these sectors across Victoria [within 12 months].

Recommendation 103

The Victorian Government, through its membership of the Australian Health Workforce Ministerial Council, encourage the Ministerial Council to approve standards that facilitate a mandatory requirement that general practitioners complete family violence training as part of their continuing professional development [within 12 months].

Recommendation 105

The Victorian Government, through the Council of Australian Governments, encourage the Commonwealth Government to consider a Medicare item number for family violence counselling and therapeutic services distinct from a general practitioner mental health treatment plan. In the longer term consideration should be given to establishing a Medicare item number or a similar mechanism that will allow medical practitioners to record a family violence-related consultation or procedure and so more accurately ascertain the public cost of family violence [within 12 months].

Recommendation 108

The Victorian Government, through the Council of Australian Governments, encourage the Commonwealth Government [within 12 months] to:

- amend the National Credit Code to include family violence as a ground for financial hardship and develop an awareness campaign to ensure that both consumers and credit providers are aware of their rights and responsibilities
- work with the Australian Communications and Media Authority and its related representative bodies and associations to amend the Telecommunications Consumer Protections Code to:
 - list minimum eligibility criteria for access to hardship programs
 - make family violence an express eligibility criterion
 - incorporate a requirement for specific policies for customers experiencing family violence to clarify consent requirements for payment plans when an account is jointly held
 - include grounds for splitting jointly held debt and removing an account holder's name if family violence has occurred.

Recommendation 112

The Department of Justice and Regulation investigate whether the *Road Safety Act 1986* (Vic) should be amended so that, if a perpetrator of family violence incurs traffic fines while driving a car registered in the name of the victim, the victim is able to have the fines revoked [within 12 months] by declaring:

- They were not the driver of the vehicle at the time of the offending.
- They are a victim of family violence—as evidenced by a statutory declaration, a copy of a family violence safety notice or family violence intervention order, or a support letter from a family violence worker, general practitioner or other appropriate professional.
- They are unable to identify the person in control of the vehicle at the time for safety reasons.

Recommendation 113

The Victorian Government amend the *Infringements Act 2006* (Vic) to provide that the experience of family violence may be a special circumstance entitling a person to have a traffic infringement withdrawn or revoked [within 12 months].

Recommendation 114

The Magistrates' Court of Victoria consider [within 12 months]:

- issuing a practice direction to encourage the use of personal property conditions in family violence intervention orders
- including specific questions about personal property conditions in the information form that precedes the application for a family violence intervention order (FVIO1 form).

Recommendation 115

Victoria Police amend the Victoria Police Code of Practice for the Investigation of Family Violence to provide guidance and examples in relation to when it is appropriate to seek personal property conditions in family violence intervention orders [within 12 months].

Recommendation 117

The Victorian Government encourage the use of applications under section 233A of the *Residential Tenancies Act 2006* (Vic) [within 12 months], including by means of training and education for family violence support workers, Victoria Police and other relevant support staff in relation to the existence and operation of the provision.

Recommendation 118

The Magistrates' Court of Victoria consider issuing a practice direction to encourage magistrates hearing family violence intervention order applications to inquire as early as possible about whether the applicant and respondent are in shared rental accommodation and, if so, ensure that the protected person is notified of the right to apply for a new tenancy agreement and receives information about how to do so [within 12 months].

Recommendation 130

Victoria Police amend the Victoria Police Code of Practice for the Investigation of Family Violence to refer to the existence of the Victoria Police power to arrest for breach of an injunction for personal protection under the *Family Law Act 1975* (Cth) and to encourage police to exercise that power. Victoria Police should provide training in relation to the existence of that power [within 12 months].

Recommendations considered discrete, standalone

Recommendation 141

The Victorian Equal Opportunity and Human Rights Commission issue a guideline under section 148 of the *Equal Opportunity Act 2010* (Vic) to guide service providers in meeting their obligation to act inclusively and avoid discrimination when delivering services to all people who are affected by family violence. The guideline should apply to family violence service providers (including men's behaviour change programs), as well as to universal and mainstream organisations [within 12 months].

Recommendation 153

The Victorian Government resource the development and delivery of information on family violence using channels such as seniors online, information distributed with Victorian Seniors Cards, Seniors Week and the Seniors Information Centre [within 12 months].

Recommendation 154

The Victorian Government, through the Council of Australian Governments, will encourage the Commonwealth Government [within 12 months] to:

- ensure that the Human Resource Management Standard in the Community Care Common Standards Guide specifies that workers delivering services must have successfully completed certified training in identifying family violence and responding to it.
- review the existing Community Services Training Package courses relevant to providing ageing support to ensure that each course has a core, rather than elective, unit that adequately covers all manifestations of family violence.

Recommendation 157

The Victorian Government update its guidelines on policy and procedures in using interpretative services to specifically deal with family violence—in particular, the risks of using perpetrators, children and other family members as interpreters, as well as using the same interpreter for both perpetrator and victim [within 12 months].

Recommendation 159

Victoria Police [within 12 months]:

- amend the Code of Practice for the Investigation of Family Violence to emphasise the risks associated with using children as interpreters and using the same interpreter for both perpetrator and victim, as well as to provide practical guidance to officers on the use of interpreters.
- provide training at all appropriate levels on the amended Code of Practice requirements relating to interpreters.

Recommendation 162

The Victorian Government, through the Council of Australian Governments, encourage the Commonwealth Government to broaden the definition of family violence in the *Migrations Regulations 1994* (Cth) so that it is consistent with the *Family Violence Protection Act 2008* (Vic) and to ensure that people seeking to escape violence are entitled to crisis payments (regardless of their visa status) [within 12 months].

Recommendation 184

Corrections Victoria ensure that therapeutic interventions such as individual counselling and group-based programs such as Out of the Dark are available for all women in prison who have experienced family violence [within 12 months].

Recommendation 186

Victoria Police amend the Victoria Police Code of Practice for the Investigation of Family Violence to describe the difficulties women in the sex industry face in reporting family violence to police and how to take those difficulties into account when investigating family violence perpetrated against these victims [within 12 months].

Recommendation 210

The Victorian Government encourage the Commonwealth Government to extend the HECS–HELP benefit scheme to graduates employed in specialist family violence services and associated services (such as community legal services that provide legal services to victims of family violence) [within 12 months].

Recommendation 213

The Victorian Government establish family violence principal practitioner positions in the Department of Health and Human Services, the Department of Education and Training and the Department of Justice and Regulation [by 31 December 2016].

Recommendation 214

The Victorian Attorney-General consider, when recommending appointments to the magistracy, potential appointees' knowledge, experience, skills and aptitude for hearing cases involving family violence, including their knowledge of relevant aspects of federal family law [within 12 months].

Recommendation 217

The Victorian Government introduce in the 2017–18 State Budget additional output performance measures relating to the prevention of family violence and the assistance provided to victims and perpetrators in order to increase the visibility of family violence in budgetary processes.

Recommendation 221

In the 2016–17 State Budget the Victorian Government give priority to:

- providing an immediate funding boost to increase the capacity of specialist family violence services and Integrated Family Services to respond to existing demand
- implementation of the Commission's recommendations that relate to that budget period.

Recommendations considered complex, interrelated

Recommendation 4

The Victorian Government facilitate the roll-out of the Risk Assessment and Management Panels, or RAMPs, as a priority [within 12 months], ensuring that this includes:

- adequate resourcing and support—case management and links to long-term support
- standardised referral guidance, to be used by all agencies, that is aligned to the revised Family Violence Risk Assessment and Risk Management Framework to identify high-risk cases for referral to RAMPs
- organisational and practice guidelines for effective RAMP operation, supported by a targeted workforce development and training program
- processes for supporting oversight by Regional Family Violence Integration Committees
- implementation oversight by the Cabinet Family Violence Sub-committee and the Victorian Secretaries Board Family Violence Sub-committee.

Recommendation 9

The Victorian Government examine options for the development of a single case-management data system to enable relevant agencies to view and share risk information in real time [within 12 months].

Recommendation 85

The Victorian Government [within 12 months]:

- map the roles and responsibilities of all government and non-government agencies and service providers that have contact with perpetrators of family violence
- confirm the principles that should inform the programs, services and initiatives required to respond to perpetrators of family violence who pose a high, medium or low risk to victims.

Recommendation 187

The Victorian Government ensure that the Commission's recommended Statewide Family Violence Action Plan includes a primary prevention strategy [within 12 months] that should:

- be implemented through a series of three-year action cycles
- refer to actions to be taken and be accompanied by performance measures
- guide and be guided by the Victorian Government's Gender Equality Strategy
- be supported by dedicated funding for family violence primary prevention.

Recommendation 195

The Victorian Government require all ministers to report regularly on the risks and opportunities in their portfolio relevant to family violence. The charter letters of all ministers should require them to consider the effect of proposed policies or legislation in their portfolios on the Statewide Family Violence Action Plan and family violence [within 12 months].

Recommendation 199

The Victorian Government establish an independent statutory Family Violence Agency [by 1 July 2017] to:

- monitor and report on implementation of the Commission's recommendations and of the Statewide Family Violence Action Plan
- provide expert policy advice on family violence at the request of Cabinet, the Premier or the Victorian Secretaries Board
- undertake and commission applied research, policy and evidence reviews and conduct own-motion inquiries into the operation of the family violence system
- liaise with relevant Commonwealth government and national agencies in developing policy and practice to enhance primary prevention efforts and improve responses to family violence
- establish a means by which service providers can share information about programs
- liaise with the Crime Statistics Agency and other agencies to coordinate data collection and sharing for the purposes of assessing the overall performance of systems that respond to family violence.

Recommendation 220

The Victorian Government ensure that the recommended Statewide Family Violence Action Plan emphasises prevention, early intervention and supporting the long-term recovery of victims. It should also identify the funding that will be required to pursue these goals [within 18 months].

Recommendation 224

The Victorian Secretaries Board develop and promulgate principles for purchasing services that will contribute to achieving the goals of the Statewide Family Violence Action Plan [within 18 months]. These principles should include:

- measures to encourage service providers to collaborate in order to enable clients to receive a broader range of services
- ways of simplifying pathways of support
- ensuring victims and their children have access to a comprehensive range of services, regardless of where they live in Victoria
- allowing sufficient time for piloting, evaluation and adaptive management of new programs.

Other recommendations (being assessed as to complexity)

Recommendation 2

The Victorian Government amend the *Family Violence Protection Act 2008* (Vic) [within 12 months] so that it:

- empowers the relevant minister or secretary to approve a Family Violence Risk Assessment and Risk Management Framework (and roles and responsibilities, standards and practices under it) for family violence risk assessment in Victoria
- sets out the principle that 'prescribed organisations' and agencies contracted by the Victorian Government to provide family violence services (if not otherwise prescribed organisations) are required to align their risk assessment policies, procedures, practices and tools with the Family Violence Risk Assessment and Risk Management Framework as approved by the relevant minister or secretary.

Recommendation 5

The Victorian Government amend the *Family Violence Protection Act 2008* (Vic) to create a specific family violence information-sharing regime. The new regime [within 12 months] should be consistent with the guiding principles and design elements described in this report.

Recommendation 11

The Victorian Government provide additional funding for specialist family violence support services to deal with the current crisis in demand and to ensure that victims of family violence receive appropriate support [within 12 months].

Recommendation 17

The Victorian Government expand the provision of Family Violence Flexible Support Packages [within 12 months]. These packages should provide to victims assistance beyond the crisis period and should include longer term rental and mortgage subsidies where required, along with assistance for costs associated with securing and maintaining counselling, wellbeing, education, employment, financial counselling and other services designed to assist housing stability and financial security.

Recommendation 19

The Victorian Government establish a Family Violence Housing Assistance Implementation Task Force consisting of senior representatives from the public and commercial housing sectors and family violence specialists [within 12 months]. The task force, which should report through the Minister for Housing to the Cabinet Family Violence Sub-committee, should:

- oversee a process designed to remove blockages in access to family violence crisis accommodation by rapidly rehousing family violence victims living in crisis and transitional accommodation

- design, oversee and monitor the first 18-month phase of the proposed expanded Family Violence Flexible Support Packages (including rental subsidies)
- quantify the number of additional social housing units required for family violence victims who are unable to gain access to and sustain private rental accommodation
- subject to evaluation of the proposed expanded Family Violence Flexible Support Packages, plan for the statewide roll-out of the packages (including rental subsidies) and the social housing required.

Recommendation 25

The Department of Health and Human Services, together with Victoria Police, develop and strengthen its current practice guidelines to facilitate further engagement with perpetrators of family violence [within 12 months] with the aim of:

- exhausting all efforts to interview the alleged perpetrator of the violence
- protecting the safety of child protection practitioners who must work with alleged perpetrators of family violence
- developing 'feedback loops' with Victoria Police and other relevant agencies—including the recommended Support and Safety Hubs, once established—in order to obtain and share information about family violence perpetrators and so assist with risk assessment and risk management.

Recommendation 26

The Department of Health and Human Services develop and strengthen practice guidelines and if necessary propose legislative amendments to require Child Protection—in cases where family violence is indicated in reports to Child Protection and is investigated but the statutory threshold for protective intervention is not met— [within 12 months] to:

- ensure the preparation of a comprehensive and robust safety plan, either by Child Protection or by a specialist family violence service
- make formal referrals for families to relevant services—including specialist family violence services, family and child services, perpetrator interventions, and the recommended Support and Safety Hubs, once established
- make formal referrals for children and young people to specialist services—including counselling services—if children or young people are affected by family violence or use violence.

Recommendation 36

Pending the establishment of the recommended Support and Safety Hubs, the Victorian Government ensure that Integrated Family Services has sufficient resources to respond to families experiencing family violence [within 12 months].

Recommendation 69

The Victorian Government, through the Council of Australian Governments Law, Crime and Community Safety Council, pursue the expansion of resourcing for legal services, including Victoria Legal Aid and community legal centres, to resolve the current under-representation by and over-burdening of duty lawyer services in family violence matters [within 12 months].

Recommendation 86

The Victorian Government convene a committee of experts on perpetrator interventions and behaviour change programs [within 12 months] to advise the government on the spectrum of programs, services and initiatives that should be available in Victoria—in the justice system and in the community—to respond to all perpetrators across varying forms and risk levels of family violence. The committee should consider men's behaviour change programs, clinical models such as cognitive behaviour therapy, strengths-based programs and fathering-specific models, online programs, and services for perpetrators from diverse communities. The expert advisory committee should consist of members with expertise in a variety of disciplines and practice approaches and with experience in working directly with perpetrators and victims of family violence, including those from diverse communities.

Recommendation 99

The Victorian Government encourage and facilitate mental health, drug and alcohol and family violence services to collaborate [within 12 months] by:

- resourcing and promoting shared casework models
- ensuring that mental health and drug and alcohol services are represented on Risk Assessment and Management Panels and other multi-agency risk management models at the local level.

Recommendation 100

The Royal Australian College of General Practitioners, the Royal Australian and New Zealand College of Psychiatrists, and psychologist and drug and alcohol service peak bodies collaborate to develop a database of psychiatrists, psychologists, drug and alcohol practitioners and any other professionals with expertise in family violence to help general practitioners when making referrals [within 12 months].

Other recommendations (being assessed as to complexity)

Recommendation 104

The Victorian Government increase investment in programs to ensure that people who have been affected by family violence have timely access to group-based or individual counselling for as long as they need. The counselling should be delivered by practitioners with appropriate training [within 12 months].

Recommendation 110

The Victorian Government encourage the Victorian Energy and Water Ombudsman and the Commonwealth Financial Services Ombudsman and Telecommunications Ombudsman to publicise the availability of their dispute-resolution processes to help victims of family violence resolve disputes with service providers in relation to debts and liabilities incurred in the context of family violence [within 12 months].

Recommendation 111

The Victorian Government encourage the Australian Bankers' Association, through its Financial Abuse Prevention Working Group, to develop a family violence-specific industry guideline [within 12 months]. This should be supported by training and education for relevant banking staff, to help them understand, identify and deal with economic abuse associated with family violence.

Recommendation 131

The Victorian Government, through the Council of Australian Governments Law, Crime and Community Safety Council, pursue amendments to the *Family Law Act 1975* (Cth) [within 12 months] to:

- provide that a breach of an injunction for personal protection is a criminal offence
- increase the monetary limit on the jurisdiction of the Magistrates' Court of Victoria to divide the property of parties to a marriage or a de facto relationship (section 46)
- make it clear that the Children's Court of Victoria can make orders under Part VII of the *Family Law Act* in the same circumstances as the Magistrates' Court of Victoria (sections 69J and 69N).

Recommendation 134

The Victorian Government, through the Council of Australian Governments Law, Crime and Community Safety Council, pursue [within two years]:

- the creation of a single database for family violence, child protection and family law orders, judgments, transcripts and other relevant court documentation that is accessible to each of the relevant state, territory and Commonwealth courts and other agencies as necessary
- the development of a national family violence risk assessment framework and tool and consistent use of such a framework or tool by state, territory and Commonwealth courts, lawyers, government and non-government service providers.

Recommendation 137

The Department of Health and Human Services support on a continuing basis the co-located child protection practitioner initiative in the Victorian registries of the Family Court of Australia and the Federal Circuit Court of Australia.

Recommendation 161

The Department of Health and Human Services, in collaboration with the Victorian Multicultural Commission, community organisations and other relevant bodies, develop a strategy for informing service providers, specialist family violence services and other community organisations about the health impacts of female genital mutilation, emphasising that it can be a form of family violence and a criminal offence [within 12 months].

Recommendation 178

The Victorian Government extend eligibility for the Victorian Disability Family Violence Crisis Response to assist people with disabilities who are victims of family violence and are not eligible for services under the *Disability Act 2006* (Vic) but who nevertheless require assistance. Such eligibility should apply when these individuals do not have access to alternative supports [within 12 months].

Recommendation 180

The Victorian Government publicise and promote the Victims Support Agency in any information campaign relating to family violence as the primary source of assistance for male victims. The agency should also provide appropriate online resources for male victims [within 12 months].

Recommendation 191

The Victorian Government, through the Council of Australian Governments, encourage the Commonwealth Government to amend the National Employment Standards in Part 2-2 of the *Fair Work Act 2009* (Cth) to include an entitlement to paid family violence leave for employees (other than casual employees) and an entitlement to unpaid family violence leave for casual employees [within 12 months].

Recommendation 196

The Victorian Secretaries Board institute working arrangements—for example, the establishment of a sub-committee—to support effective oversight of family violence prevention and responses. Membership of the sub-committee should include the Secretaries of Treasury and Finance, Justice and Regulation, Health and Human Services, and Education and Training, the Chief Commissioner of Police and the Chief Executive Officer of Court Services Victoria. The sub-committee should be chaired by the Secretary of the Department of Premier and Cabinet [within 12 months].

Recommendation 198

The Victorian Government establish a family violence unit within the Department of Premier and Cabinet to support the work of the Cabinet Family Violence Sub-committee, the Victorian Secretaries Board, and the Statewide Family Violence Advisory Committee. The unit will lead whole-of-government work with other departments and policy units with family violence responsibilities (including the Office for Women) and should be responsible for ensuring that Victoria meets its obligations under the National Plan to Reduce Violence against Women and their Children [within 12 months].

Recommendation 200

The Victorian Government re-establish the Violence against Women and Children Forum as the Statewide Family Violence Advisory Committee to advise the government on family violence policy and service provision [within 12 months]. The committee should include representation from experts, victims of family violence and system advocates with perspectives on both prevention of and support for victims of family violence. Consultation with the committee should inform the evolution and implementation of the Statewide Family Violence Action Plan.

Recommendation 222

The Victorian Government treat the extension of the National Partnership Agreement on Homelessness as a matter of urgency and pursue it immediately with the Commonwealth Government [within 12 months].

Appendix B

The Family Violence Reform Implementation Monitor would like to thank the following Organisations and Stakeholders for their time

Aboriginal Family Violence Prevention & Legal Service Victoria
Alfie Bamblett, Indigenous Family Violence Regional Action Group
Andrew Jackomos, (then) Commissioner for Aboriginal Children & Young People
Barwon Centre Against Sexual Assault
Belinda Clark QSO, Victorian Public Sector Commissioner
Berry Street
Bethany Community Support
Centre for Excellence in Child and Family Welfare
Chief Magistrate Peter Lauritsen
Children's Court of Victoria
Colleen Pearce, Public Advocate for Victoria
Community Safety Trustee, Ron Iddles
Council to Homeless Persons
Court Services Victoria
Crime Statistics Agency
Deborah Glass OBE, Victorian Ombudsman
Department of Economic Development, Jobs, Transport and Resources
Department of Education and Training
Department of Environment, Land, Water and Planning
Department of Health and Human Services
Department of Justice and Regulation
Department of Treasury and Finance
Domestic Violence Resource Centre Victoria
Domestic Violence Victoria
Family Safety Victoria
Federation of Community Legal Centres
Geelong Magistrates' Court
Hazelwood Mine Fire Inquiry, Implementation Monitoring Team
Inspector-General for Emergency Management

inTouch, Multicultural Centre Against Family Violence
Judge Amanda Chambers, President of the Children's Court of Victoria
Laurie Harkin AM, Disability Services Commissioner
Liana Buchanan, Commissioner for Children and Young People
Magistrates' Court of Victoria
Mary Polis, former Chief Executive Officer, Royal Commission into Family Violence, Victoria
Mr John Pesutto MP, Shadow Attorney-General
Ms Georgie Crozier MP, Shadow Minister for Prevention of Family Violence
Multicultural Centre for Women's Health
Municipal Association of Victoria
National Ageing Research Institute
Neil Comrie AO APM, former Bushfires Royal Commission Implementation Monitor
No To Violence / Men's Referral Service
Office of Prevention & Women's Equality
Office of Public Prosecutions
Our Watch
Professor Cathy Humphreys, Professor of Social Work and Co-Director of the Melbourne Alliance to End Violence Against Women and Their Children, University of Melbourne
Regional Family Violence Partnership
Rosie Batty, Luke Batty Foundation
Rowena Allen, Victorian Commissioner for Gender and Sexuality
Safe Steps
Sal Perna, Racing Integrity Commissioner
Seniors Rights Victoria
Sentencing Advisory Council
The Hon. Mary Wooldridge MLC, Shadow Minister for Health
The Hon. Daniel Andrews MP, Premier of Victoria
The Hon. Fiona Richardson MP, Minister for Family Violence Prevention
The Hon. Gavin Jennings MLC, Special Minister of State
The Hon. Jenny Mikakos MLC, Minister for Families and Children
The Hon. Jill Hennessy MP, Minister for Health

The Hon. Lisa Neville MP, Minister for Police

The Hon. Marcia Neave AO, Commissioner, Royal Commission into Family Violence

The Hon. Martin Foley MP, Minister for Equality, Minister for Housing, Disability, Ageing

The Hon. Martin Pakula MP, Attorney-General of Victoria

The Hon. Natalie Hutchins MP, Minister for Aboriginal Affairs, Minister for Industrial Relations Minister for Women, Minister for the Prevention of Family Violence

Victim Survivors' Advisory Council

Victoria Legal Aid

Victoria Police

Victorian Aboriginal Child Care Agency

Victorian Aboriginal Community Controlled Health Organisation

Victorian Auditor-General's Office

Victorian Council of Social Service

Victorian Equal Opportunity and Human Rights Commission

Victorian Multicultural Commission

Women with Disabilities Victoria

Women's Health Association of Victoria

Women's Health Grampians

Women's Health Victoria

Women's Legal Service

Accessibility

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