



Embolden's Response

to recommendations from the Royal Commission into domestic, family and sexual violence

Embolden is the peak body for domestic, family and sexual violence services in South Australia and represents 26 organisations and discrete services delivering specialist services statewide. Embolden led the call for a Royal Commission into domestic, family and sexual violence at the end of 2023. The Royal Commission commenced on 1 July 2024, led by Natasha Stott Despoja AO. The Commissioner's Report [With Courage: South Australia's vision beyond violence](#) was released publicly on 19 August 2025, along with the [Voices](#) Report, a dedicated document reflecting the voices of people with lived and living experience.

The Commissioner's recommendations are a blueprint for transformative change in how South Australia prevents and responds to domestic, family and sexual violence. Embolden looks forward to working in close partnership with the State Government through the significant reform process ahead.

Embolden's response to the Commissioner's recommendations is informed by the organisations and specialist services we represent, and reflects the positions outlined in our two submissions to the Royal Commission in August and September 2024. We note that some of our member organisations will provide their own responses. Embolden's response to the Royal Commission Report is intended to complement these individual responses with a collective voice from the sector.

We acknowledge the importance of the South Australian Aboriginal Community Controlled Organisation Network (SAACCON) as the representative body for Aboriginal-led services and commend to the State Government SAACCON's response to the Royal Commission recommendations. We also acknowledge and commend to government the important representative voice of other peak bodies and key organisations, including but not limited to:

- Child and Family Focus SA
- Council of the Ageing SA
- JFA Purple Orange
- Multicultural Communities Council of SA
- SA Rainbow Advocacy Alliance
- SACOSS
- Wakwakurna Kanyini
- Youth Affairs Council of SA

Contents

Chapter 2 – Creating a cohesive and effective system	3
Leadership, collaboration and stewardship	3
Accountability	4
Statewide domestic, family and sexual violence strategy	5
Listening to and acting on the advice of people with lived experience	5
A statewide Risk Assessment and Management Framework	5
A statewide framework for responding to harmful sexual behaviours in children and young people	6
From multi-agency programs to collective responsibility: building an integrated response model	6
Funding and compliance	7
Workforce	7
Chapter 3 – Making domestic family and sexual violence visible	8
Community awareness mechanisms	8
Workforce awareness mechanisms	8
Beyond awareness: justice sector specialisation	9
Locally led inductions	10
Chapter 4 – Safe and effective help seeking and crisis response	10
Chapter 5 – The Use of Violence	11
Responding to the use of violence by adults (the intervention order system)	12
Responding to the use of violence by adults (children on intervention orders)	12
Responding to the use of violence by adults (the criminal justice system)	13
Responding to the use of violence by adults (accountability through intervention programs)	13
Responding to the use of violence by adults (accountability through professional regulators)	14
Responding to the use of violence by children and young people	14
The use of violence against children and young people	14
Systems-enabled violence	15
The role of media	15
Chapter 6 – Supporting Victim Survivors	15
Meeting the needs of victim-survivors	15
Accommodation and housing	16
Accessible, inclusive and culturally safe services	17
The court experience for victim-survivors	17
Chapter 7 – Prevention	18
Prevention through education systems	19
Prevention through a whole-of-community approach	19
Prevention through regulation	20

Overarching considerations

In the following sections, Embolden provides comment on specific recommendations from the Royal Commission. In addition, there are several overarching or cross-cutting considerations that we see as important to ensure that the recommendations accepted and implemented by the State Government drive the outcomes envisioned by the Commission. These considerations include:

- The critical importance of a whole-of-government strategic framework (recommendation 10) that articulates responsibilities, outcomes, reporting requirements and funding commitments. With robust governance and independent oversight mechanisms, this is essential to ensuring that implementation of all accepted recommendations drives coherent system reform, rather than piecemeal effort.
- The expertise of diverse people with lived experience and specialist services must be central to Royal Commission implementation, through a genuine partnership between the State Government and the sector. Direct co-design with Aboriginal people and Aboriginal Community Controlled Organisations is vital to ensure that reforms privilege Aboriginal-led ways of working and the development of accessible, culturally safe services for Aboriginal people. Additionally, there should be targeted funding and support for regional/remote services for co-designed and practical responses that address the realities of service delivery in these contexts.
- Not all of the levers for reform sit within government. There must be an appropriate balance that supports sector-led initiatives and associated investment alongside the strengthening of government systems.
- Specialist frontline services and representative bodies require resourcing and support to participate in co-design processes.
- There must be a measured and sustainable approach to implementation, with consideration of ‘systems before services’: for example, the sector identifies potential negative impacts for victim-survivors if we reform the central entry-point for crisis response before development and implementation of an integrated response model. It will also be critical that services and Embolden have the capacity to provide timely insights to government in relation to on-the-ground impacts of reforms.
- State Government funding to implement recommendations should be directed to South Australian organisations. In this context, funding of domestic, family and sexual violence services must increase the proportion of funding directed to Aboriginal Community Controlled Organisations and promote Aboriginal self-determination.
- A strong and sustainable peak body for the specialist DFSV sector, with capacity to operate as an effective partner to government, is important for successful implementation of reforms. The current level of funding for Embolden does not enable adequate engagement with members and sector representation, or any substantial sector and workforce support and development initiatives. Funding for recommendation 8, if accepted, is not sufficient to address this concern.

Chapter 2 – Creating a cohesive and effective system

Embolden commends the recommendations in this chapter, which would drive a whole-of-government strategic approach to sustainable system reform and embed critical accountability mechanisms.

Leadership, collaboration and stewardship

Recommendations 1-6

- Embolden welcomes the State Government’s acceptance of the following recommendations:

- A standalone ministerial portfolio for domestic, family and sexual violence (rec 1)
- Appointment of a Government Steward to lead whole-of-government implementation (rec 2)
- An Implementation Plan by the Senior Leadership Committee (rec 4)
- In determining where the Government Steward ‘sits’, an important consideration must be the need for the Steward to exercise sufficient authority and influence across all participating State Government agencies to drive effective whole-of-government implementation.
- In relation to recommendation 4, Embolden calls on the State Government to undertake the rapid expenditure review of State Government funding as an absolute priority.
- Embolden urges the State Government to accept recommendation 3: the development and maintenance of a domestic, family and sexual violence linked-data dashboard. Embolden’s submissions to the Royal Commission note the vital importance of specialist services’ data to our state’s evidence-base (potentially through BEBOLD), and advocates that:
 - resourcing to support domestic, family and sexual violence services with data development, collection, analysis and reporting be built into service contracts; and
 - sector representative bodies – in particular Embolden and SAACCON – be adequately resourced to contribute to the development of South Australia’s evidence-base, data integration across systems and effective evaluation of interventions to better identify ‘what works’.
- Reflected in recommendations 5 and 6, Embolden welcomes the Commission’s recognition of the need for enhanced leadership focus, operational capability and cohesion across justice agencies. Embolden strongly supports the capability requirements of the recommended new SAPOL branch or service specified by the Commission in Figure 2.1. In the context of South Australia’s criminalisation of coercive control, an inadequate response to these recommendations increases the risk of unintended negative impacts for victim-survivors.
- The specialist domestic family and sexual violence services sector should be represented on the working group proposed under recommendation 6, to ensure comprehensive consideration of the experiences and outcomes for victim-survivors e.g. the risk of misidentification as the person using violence.

Accountability

Recommendations 7, 8 and 9

- Embolden commends the State Government’s acceptance of the Commission’s recommendation that Chief Executives be held accountable for achievements against the Implementation Plan through performance agreements (rec 9).
- Embolden has strongly advocated for independent monitoring of progress against the Royal Commission recommendations and urges the State Government to establish the South Australian Ombudsman as the Implementation and Impact Monitor (rec 7).
- In addition, Embolden welcomes the recommendation that the State Government fund Embolden to establish an Advisory Group to the Implementation and Impact Monitor for the State Government’s Implementation Plan (rec 8), and supports the diverse scope of membership proposed by the Commission.

Statewide domestic, family and sexual violence strategy

Recommendation 10

- The sector welcomes the State Government's commitment to implement recommendation 10: A five-year statewide strategy and a standalone strategy led by and for Aboriginal South Australians.
- Embolden notes and supports the Commission's comment that 'development of the strategy must occur in partnership with the domestic, family and sexual violence sector and people with lived experience'.

Listening to and acting on the advice of people with lived experience

Recommendations 11, 12 and 13

- Embolden supports the State Government's commitment to Lived Experience Advisory Networks for adults and children/young people (recs 11 and 12). We urge the State Government to also accept recommendation 13, as a reasonable complement to recommendation 9.
- As the Commission notes, Embolden developed [SA's Roadmap for Lived Experience Engagement](#), in partnership with the Domestic and Family Violence Safety Alliance (DFVSA). Embolden and the DFVSA consider that the specialist sector, rather than government, is most appropriately skilled and positioned to convene and support lived experience engagement mechanisms (with adequate resourcing). For some victim-survivors, lived experience advocacy can be an important part of recovery, and close links with services and supports are needed to minimise risks of re-traumatisation. It is also important that lived experience engagement mechanisms are not merely extractive and meaningfully support skills development for survivors.
- Specifically, it is the sector's view that the Lived Experience Advisory Networks (rec 11) should be convened by Embolden, in close collaboration with appropriate partners. Embolden would work in partnership with the State Government to develop and maintain an effective interface between the LEANs and the Lived Experience Advisory Group/s (rec 12), which will provide direct advice and expertise to the Minister.
- Members of the LEANs could potentially be engaged in policy, practice and service development for the specialist sector, as well as in key work being undertaken by State Government agencies. It would be important that this is effectively managed so that LEAN members are not overburdened or pressured, and are appropriately supported.
- It is also Embolden's and the DFVSA's clear position that the development of practice frameworks to support implementation of lived experience engagement mechanisms should sit with the specialist domestic, family and sexual violence sector.

A statewide Risk Assessment and Management Framework

Recommendations 14, 15 and 16

Embolden's submissions to the Royal Commission raised a range of issues in relation to current risk assessment processes, drawn from the direct experience of specialist frontline services.

- We commend the Commission's recommendation for a new statewide Risk Assessment and Management Framework as an important component of statewide system reform, and support the proposed elements of the RAMF outlined in figure 2.2. We urge the State Government to accept the related recommendations and to prioritise engaging ANROWS to undertake this work (rec 14).

- The specialist sector and diverse voices must be engaged in co-design processes to inform the new RAMF, and associated tools and training, and ensure that it is strengths-based, culturally responsive and effective across diverse groups and contexts, including a focus on practical application in regional and remote areas. Development of the RAMF must also encompass the needs of victim-survivors of sexual violence and should engage specialist services in this area accordingly.
- Implementation of a new RAMF would need to address inconsistency in the use of risk assessment tools across agencies, which has occurred despite the use of common risk assessment tools like the DVRA.
- While we agree with the Commission's statement that this work cannot wait for a national model, it will be important that the development of a RAMF for SA keeps abreast of any national work in this space. Additionally, the development of the RAMF should aim to effectively navigate rather than exacerbate current cross-jurisdictional challenges with risk assessment and support/align with nationally collaborative approaches to risk assessment and information sharing.
- The sector is also supportive of the recommended incorporation of needs assessment within the RAMF, in the context of an integrated response model and referral network statewide. We consider that this will be an important driver of more holistic responses that better meet the diverse needs of people experiencing (and using) violence and will embed a recovery and healing focus at all points of victim-survivors' engagement with services. However, it must be recognised that the broader focus on needs assessment, and the implications for case management and coordination of flexible funding packages, has significant implications for the workload of frontline specialist workers.

A statewide framework for responding to harmful sexual behaviours in children and young people

Recommendation 17

Embolden strongly urges the State Government to accept and implement recommendation 17 to develop a South Australian framework for recognising and responding to harmful sexual behaviours in children and young people.

From multi-agency programs to collective responsibility: building an integrated response model

Recommendations 18-22

Embolden strongly commends the Commission's clear recognition of the need for the development and implementation of a statewide integrated response model. As mentioned in the Report, our September 2024 submission stated:

'In our call for a Royal Commission, Embolden made clear that the foundation of system reform in South Australia should be the creation of an holistic, integrated and place-based service response, able to meet the diverse needs of women and families across the state.'

- We urge the State Government to progress co-design of an integrated response model, commencing the rapid review of statewide demand and service availability as soon as possible. Effective coverage in regional and remote contexts must be an important focus.
- The sector supports the elements of the proposed model outlined in figure 2.3, drawing on WA's approach; particularly the recognition of specialist Aboriginal Community Controlled Organisations, the inclusion of child-focused practitioners, practitioners skilled and experienced in delivering whole-family supports, and

services targeted to people using violence. As outlined in figure 2.3, it is important that referrals into the response model can come from members other than police, which seems not to be (or not to have been previously) the case in WA. Additionally, the interface with the child protection system requires careful consideration. It is important to consider how the proposed model intersects with responses to provide earlier help to families being considered and progressed within the child protection context. More broadly, the interface with the Thriving Families initiative must be part of cohesive service planning statewide.

- We note the ‘soft entry point’ benefits of the proposed One Stop Hubs and emphasise that the Hubs must operate as an entry point to a range of culturally safe services that meet the needs of diverse community members. Partnerships with a range of community-based services, including for CALD communities, and government services such as SA Health, will promote access and reduce barriers to services.
- The evaluations currently being undertaken of the northern and southern hubs should inform the design of the integrated response model. Lessons learned from models operating in other jurisdictions will also be valuable, including neighbourhood justice centres.

Funding and compliance

Recommendations 23-26

- The Domestic and Family Violence Safety Alliance (DFVSA) welcomes the recommended review (recommendation 23), aligning with the DFVSA’s call for an evaluation framework and recommendations since the establishment of alliancing structures. We note that this review is already underway and scheduled to be completed by June 2026, and Alliance members look forward to engaging with the review team. The DFVSA notes the importance of timely action by government on the review recommendations, given the timeframes of current Alliance contracts.
- The sector strongly commends the Commission’s recommendation for a significant and sustained uplift in funding for specialist services (recommendation 24). We also strongly agree that domestic and family violence funding and service delivery should not be bound by homelessness frameworks: our work is ‘safety first’ rather than ‘housing first’. However, noting that the National Agreement on Social Housing and Homelessness does not explicitly reference domestic, family and sexual violence, the sector would need assurances that disentangling funding from homelessness funding would not result in the loss of federal funding streams for domestic and family violence services. We urge the State Government to consider the option of an uplift in domestic and family violence services funding *alongside* homelessness funding, to enable a more flexible and responsive model across the spectrum of victim-survivor needs.
- The sector welcomes recommendations 25 and 26 and the model commissioning, reporting and data collection principles outlined in figure 2.4. However, we have previously advocated for 5-year contracts. Additionally, the real costs of service delivery must factor in the increased costs for regional and remote services, as well as other costs for services, such as those associated with lived experience engagement, and the development and use of new data systems.

Workforce

Recommendations 27-30

- As mentioned in the Report, Embolden has advocated strongly for the development and implementation of a dedicated and targeted workforce strategy for the specialist domestic, family and sexual violence services sector, for reasons that are clearly articulated by the Commission. Successful implementation of the

Commission's recommendations will rely fundamentally on building the capacity and capability of the specialist workforce, including Aboriginal workers.

- We urge the State Government to accept recommendations 27 and 28 for a 10-year sector workforce development strategy and fund, and to commence this work as a priority.
- The workforce development strategy must be developed in partnership with Embolden and SAACCON, with the peaks funded to deliver key capability and development initiatives.
- The workforce strategy should incorporate the development of roles, accredited qualifications and training for peer work, drawing on lessons from the mental health and AOD sectors.
- Embolden's members support the Commission's recognition of the impacts of colonial and cultural load and support recommendations 29 and 30.

Chapter 3 – Making domestic family and sexual violence visible

The specialist sector welcomes chapter 3's focus on strengthening community and workforce capacity to recognise and respond to domestic, family and sexual violence, including non-physical and technology-facilitated violence. We commend the Commission's recognition of the need for 'community-led, strengths-based education initiatives, accompanied by appropriate, culturally safe, inclusive and accessible service delivery'.

However, we note that, in this context, the Commission has not focused on some key community-based mechanisms to strengthen capacity among 'natural responders', including community centres. This is a potential missed opportunity that we urge the State Government to consider.

Community awareness mechanisms

Recommendations 31 and 32

- Embolden supports these recommendations for statewide awareness campaigns and two standalone government websites, one targeted to children and young people. We would like to highlight the importance of specialist services being included in co-design processes, to ensure that content aligns with best practice messaging about domestic, family and sexual violence and accurately reflects frontline service contexts.
- Broad-reach community awareness and education approaches must be supplemented with targeted, community-led engagement initiatives, such as the Australian Refugee Association's Communities for Change and Strong Men Stronger Families projects. Multicultural Communities Council of SA, which is developing a response to the Commissioner's Report, has advocated for greater engagement with faith leaders on domestic, family and sexual violence. The Commission references faith leaders as an 'issue for further consideration' and we urge the State Government to support the MCCSA to progress this work.

Workforce awareness mechanisms

Recommendations 33-36

- In relation to recommendation 35, the program of work undertaken by the Commissioner for Public Sector Employment should extend beyond static resources and encompass dedicated project positions responsible for coordinating workforce-focused initiatives to prevent and address domestic, family and sexual violence across public sector agencies. Such positions act as key catalysts, driving good practice (for example through a public sector Community of Practice) and creating efficiencies for government (including a centralised

approach to public sector training). Such positions have sat previously within the Office of the Commissioner for Equal Opportunity and led whole-of-public sector implementation of Our Watch's Workplace Equality and Respect Standards and White Ribbon accreditation, with participating government agencies providing clear feedback on the value of these central coordinating positions.

- Noting the Commission's reference to the lack of a sector representative on the SA Skills Commission's Industry Skills Council, Embolden would welcome an opportunity for membership of the Council.
- In relation to recommendation 36, Embolden sees a key role for the specialist sector, alongside the State Government, in working with the university and VET sectors to embed domestic, family and sexual violence content within qualifications.

Beyond awareness: justice sector specialisation

Recommendations 37-44

- Embolden commends the Commission's recommendations within this section, targeted to the justice sector.
- We note however, the lack of recommendations focused on building capacity to address domestic, family and sexual violence within the statutory child protection system. Informed by specialist frontline perspectives, Embolden's submissions to the Royal Commission highlighted a significant need for:
 - enhanced training on domestic and family violence for Department for Child Protection (DCP) staff;
 - a greater focus on domestic and family violence in policy and practice development within the child protection system; and
 - the development of clearer processes and mechanisms for effective collaboration between child protection and specialist domestic and family violence services.
- In relation to the need for specialised, evidence-based education and training for police and the broader justice sector, we advocate that the training be:
 - co-developed with the specialist domestic, family and sexual violence sector. It is essential that services that support victim-survivors are part of the development and delivery of education for the criminal justice workforce.
 - grounded in, and explicitly link to, organisational policies and procedures, and the local service context. In line with this, training providers/partners should be South Australian.
- We note that the Parole Board is not specifically referenced here and recommend that DFSV training and capacity-building efforts extend to the Parole Board. Additionally, decision-making by the Parole Board could be supported through referral to the Commissioner for Victim's Rights for input in relation to DFSV matters (with an appropriate threshold for referral).
- In responding to these recommendations, we urge the State Government to consider the requirement that training outcomes be identified and evaluated: for example; improved prosecution outcomes for sexual violence cases; reduction in the number of domestic and family violence victim-survivors misidentified as the primary aggressor; a reduction in sexual violence myths and misconceptions being invoked and/or unchallenged in court proceedings.

Locally led inductions

Recommendation 45

- The sector supports the intent of this recommendation, but regional frontline specialist services should not be expected to deliver local inductions to new frontline government employees without funding for this function.

Chapter 4 – Safe and effective help seeking and crisis response

- The sector commends the Commission’s recognition of the critical need to address systemic barriers to help-seeking, and to develop genuinely safe, accessible and inclusive responses statewide. We urge the State Government to accept the recommendations in this chapter.
- In line with our consistent advocacy, the sector strongly supports recommendation 46 for a non-government, central entry-point crisis and information service. We note the need to ensure that there are always alternative pathways to service access, through embedding a genuinely ‘no wrong door’ system statewide. We commend the Commission’s recognition that this central access point must be accessible via a range of methodologies and co-designed with people with lived experience (including children and young people) and specialist services. Careful consideration must be given to sequencing of initiatives and the potential risks for victim-survivors should this work precede the implementation of an effective integrated response model.
- In underscoring the need for robust co-design of the central entry-point (and the associated statewide referral network proposed), Embolden’s members have pointed to a number of important considerations, including but not limited to:
 - issues around victim-survivor choice and agency;
 - the need for clarity in relation to who ‘holds’ the relationship with clients and responsibilities across agencies, and associated considerations around client consent and transparency in how information is being accessed and shared; and
 - how a central crisis and information service might operate for men seeking support for their use of violence, and services working in this area.
- The DFVSA strongly endorses recommendation 47. Improved data collection tools, reflective of the focus, impact and outcomes of domestic, family and sexual violence services, is vital to effective service delivery, continuous improvement and innovation. We note the recent review of H2H includes significant engagement with the sector and feedback from frontline staff. We also note alignment of this recommendation with current initiatives aiming to improve system capacity to understand and measure domestic and family violence service demand, capacity and impact e.g. the Safety Measures Program - <https://www.safetymeasures.org.au/>
- Embolden has advocated for greater investment in earlier, holistic supports for families, including in regional and remote areas, and to address statewide services delivery gaps for children and young people. As such, we strongly support recommendation 48 for the expansion of the Child and Family Support Service.
- We also support recommendation 49 to pilot a child protection notification system for pre-birth reports that provides pathways to intensive supports, building on the existing Corka Bubs program. We note that SAACCON and the Family Violence Legal Services Aboriginal Corporation will respond to this recommendation. Embolden’s members have pointed to the importance of initial voluntary engagement, with a strengths-based and flexible approach, and a clear framework around the role of the Department for Child Protection as partners with an emphasis on non-punitive approaches. Specialist legal supports embedded

before birth are important for mothers and kin to access advice, including around statutory involvement, and make informed decisions. A multi-disciplinary approach is a significant opportunity for involvement of specialist DFSV services, including engagement with the person using violence. Embolden also recommends consideration of integrating the Aboriginal Family Birthing Program that operates regionally, with an emphasis on resourcing Aboriginal Maternal and Infant Care practitioners and Aboriginal midwives to provide culturally safe and responsive wrap-around supports for women and children across the state.

- In our submissions, Embolden called for alternative help-seeking and reporting options for victim-survivors of domestic, family and sexual violence. We commend recommendation 50 (development of alternative help-seeking pathways where a physical police presence is not required for safety) and recommendations 51 and 52 (development of alternative and optionally anonymous reporting pathways for South Australians who have experienced sexual violence). Aboriginal-led and culturally and linguistically diverse services/peaks must be engaged in the co-design of these new pathways, as well as representative bodies for other groups of South Australians facing additional barriers in help-seeking and reporting,
- Embolden also supports recommendations 53-58 to improve health responses to violence, including in relation to the availability and conduct of forensic medical examinations and screening and response to non-fatal strangulation. It is important to note that an increase in funding is required to support a statewide response, ensuring equity of access to timely and appropriate medical responses across metropolitan and regional South Australia. This includes funding current training initiatives in non-fatal strangulation to deliver training to regional clinicians, introducing Early Evidence Kits, and allowing midwives to conduct forensic medical examinations.
- Additionally, Embolden supports recommendation 59 to further enhance the Domestic Violence Disclosure Scheme's statewide accessibility and reach. The evolution of the DVDS must maintain the current model of SAPOL, as lead agency, partnering with a specialist domestic and family violence service.

Chapter 5 – The Use of Violence

In general, Embolden welcomes the Report's recommendations in chapter 5 and the focus on prioritising support and safety of victim-survivors, and effectively assisting people choosing to use violence to understand their actions and take responsibility.

However, while Embolden supports, in principle, legislative amendments to better address the use of violence, some of the recommended changes may carry a heightened risk of criminalisation of victim-survivors and potentially provide further opportunities for systems abuse. As Embolden noted in its submission to the Royal Commission, Aboriginal women are disproportionately misidentified and criminalised. While we note that these risks are addressed in other chapters, we strongly recommend they are specifically considered in relation to recommended legislative changes, especially those intended to increase criminalisation.

While Embolden welcomes the Report's emphasis on working with Aboriginal organisations and communities, we strongly recommend that all programs, services and initiatives are developed through co-design processes to ensure that they are culturally responsive and adequately address community needs and challenges.

Responding to the use of violence by adults (the intervention order system)

Recommendations 60 – 69

- Embolden welcomes the recommended strengthening of supports designed to assist victim-survivors to navigate systems safely through the establishment of a support worker service in the Family Violence Court and for regional courts (recommendation 60).
- Embolden has advocated for better supports for victim-survivors and people using violence to effectively understand Intervention Order conditions to improve compliance and safety. We urge the State Government to accept recommendation 61 for the development of a model to support the provision of consistent, clear and accessible information on terms and effects of intervention orders.
- The sector welcomes the introduction of a time-limited vacate order to improve victim-survivor safety (recommendation 62). However, Embolden's understanding is that this is in part necessitated by circumstances where magistrates overturn vacate conditions placed by police. Therefore, we suggest that implementation of this recommendation be complemented by education of the judiciary, to ensure that there is a consistent understanding of the role of vacate conditions in victim-survivor safety.
- Embolden strongly supports investigating options to give courts more time to consider intervention orders, to ensure that conditions are tailored to individual circumstances and reduce reliance on standard conditions (recommendation 63). Again, this will only achieve the intended outcome if the variable understanding among magistrates of domestic and family violence and safety for victim-survivors is addressed concurrently.
- Embolden is generally supportive of the reinvigoration of federal family violence orders (recommendation 69). However, it is important to note that increasing criminalisation poses significant risks for victim-survivors in the context of systems abuse and misidentification and these risks need to be addressed and mitigated in the context of this recommendation.

Responding to the use of violence by adults (children on intervention orders)

Recommendations 64-68

- Embolden strongly supports the Commissioner's recommendations for systemic changes to improve consistency between intervention orders and parenting orders, to promote the safety and wellbeing of children and young people (recommendations 64 and 65).
- Embolden welcomes recommendation 66 for mandatory judicial education and training and the specific inclusion of section 68R. However, the lack of recourse to 68R, despite its introduction a decade ago and training across the family law system, demonstrates the need for education and training to be monitored and evaluated for outcomes and impact.
- The sector has advocated for the inclusion of children on intervention orders to support child safety and wellbeing. We are strongly supportive of recommendation 67 to prioritise the inclusion of children on IOs in SAPOL General Orders and Prosecution Practice Notes, and to include a rebuttable presumption that children should be included on intervention orders under the *Intervention Orders (Prevention of Abuse) Act 2009* (SA) (recommendation 68).

Responding to the use of violence by adults (the criminal justice system)

Recommendations 70 – 74

- Embolden made a submission to the SA Consent Review and is strongly supportive of recommendation 70 to update South Australian legislative definitions of consent.
- We support efforts to reduce breaches of intervention orders, including in principle support for a facilitation of breach offence (recommendation 71). Embolden is pleased to see that children would not be included in this offence. However, it is important to note that victim-survivors may be inadvertently criminalised through this offence as well. This risk needs to be mitigated in any proposed legislative amendments and implementation frameworks.
- Embolden notes the significant challenges that victim-survivors face when navigating the court system to achieve a criminal justice outcome. The sector is strongly supportive of recommendations that make this process more just and trauma-informed through a comprehensive foundation in current understandings of the nature of domestic, family and sexual violence. This includes reviewing the use of character evidence (recommendation 72) and recommendations around jury directions addressing myths and misconceptions (recommendation 70b).

Responding to the use of violence by adults (accountability through intervention programs)

Recommendations 73 – 83

- Embolden strongly supports better resourcing to strengthen programs and services for people using violence, including regionally and remotely (recommendations 75-77), with minimum standards (recommendation 73) and a continuous improvement model with evaluations focused on outcomes and impact (recommendation 78).
- South Australia has a number of services with significant expertise in working with people using violence (PUV) and it is vital that these services continue to be integrally involved in the development of service approaches, including those aiming to engage people at risk of/using violence earlier. Considerations include:
 - the need for systems other than the criminal justice system to support earlier intervention – fear of criminal justice consequences stop people at risk of/using violence from engaging and families from seeking support. Non-mandated supports must be inclusive, including of LGBTIQ+ people and women using violence. Health services are well placed to improve responses and provide support, for example through Emergency Department Mental Health and Drug and Alcohol Services SA.
 - the opportunities for engaging with the person using violence through whole-family models, such as those delivered by Aboriginal-led services and services targeted to culturally and linguistically diverse communities.
 - PUV services hold important insights into systems abuse.
- The proposed Community of Practice for services and workers providing intervention programs for people using domestic, family and sexual violence (rec 74) could be convened by Embolden, co-designed with members delivering these services. It would be important that this CoP has, and maintains, a targeted focus to ensure that it is of ongoing benefit to workers in this highly specialised context.
- In line with our submissions, Embolden welcomes the focus on accommodation options for people using violence, including specific accommodation for Aboriginal people across metropolitan and regional and remote areas (recommendations 81 and 82).

- Noting the compelling evidence around the positive impacts of diversionary schemes outlined by the Commission, Embolden is supportive of recommendation 83 to pilot a scheme in the metropolitan area and regionally.

Responding to the use of violence by adults (accountability through professional regulators)

Recommendations 84 – 86)

- Embolden strongly supports not only a broader understanding of domestic, family and sexual violence across mainstream service systems, but also taking every opportunity to address the use of violence. We welcome the recommendations that advocate for existing regulatory functions to also address DFSV along the lines of the approach taken by AHPRA (recommendations 84 and 85).
- Embolden also welcomes the detailed approach to recommendation 86, on SAPOL's policy and practice when addressing allegations of DFSV identifying a serving police officer as the person using violence.
- However, as noted in other sections, these avenues for responding to the use of violence also carry significant risks if the issue of misidentification is not adequately addressed.

Responding to the use of violence by children and young people

Recommendations 87 - 88

- Embolden is pleased to see the recommendations supporting better resourcing of programs and services addressing the use of domestic and family violence, and harmful sexual behaviours, among children and young people, including partnerships with ACCOs.
- However, it is important to note that for statewide services to be accessible to regional and remote children and young people, they need to be planned and resourced to include service delivery in regional locations and to not just rely on telehealth and/or requiring people to travel to the Adelaide metropolitan area to access services.
- It is Embolden's view, expressed in our submissions, that there is a need to develop a stronger shared understanding across mainstream systems of the meaning of 'at risk of using violence' in relation to children and young people, to drive earlier, effective identification of children and young people in need of support, as well as better awareness of referral pathways.

The use of violence against children and young people

Recommendations 89 – 91

- As the Report notes, from the perspective of children and young people, allowing corporal punishment effectively legitimises the use of physical violence. Embolden therefore strongly supports the recommendations to ban the use of corporal punishment through the repeal of the reasonable chastisement defence (recommendation 89), while simultaneously supporting public (recommendation 90) and parenting education (recommendation 91).
- In terms of parenting education, Embolden suggests that other universal services also be included in the development and delivery of parenting education, in addition to the Office for Early Childhood Development. These services might include the Child and Family Health Service and metropolitan and regional child health

and development teams, as they are likely to engage individually with many parents during child health and development checks or when addressing any developmental concerns or delays.

- Embolden notes a gap in recommendations regarding the impact and prevalence of sexual violence perpetrated against children and young people. Given that 1 in 3 girls and 1 in 5 boys will experience sexual violence by the age of 18, more needs to be done to address the prevalence and impacts. Currently services specifically responding to victims of child sexual abuse and child sexual exploitation are limited and unable to provide a service to most victim-survivors.

Systems-enabled violence

Recommendations 92 - 94

- The specialist sector has noted the extent of harms caused to victim-survivors, including children, through the weaponisation of federal and state systems. Embolden has advocated for improving understanding and recognition of systems abuse and specific action to effectively combat it. Embolden is therefore very pleased to see the recommendations targeted at reducing the opportunities for systems abuse through audits of federal and state systems, including essential services.
- It is important to note that this work needs to be supplemented by effective understanding and recognition of misidentification and ensuring approaches to systems abuse take all reasonable steps to mitigate this risk.

The role of media

Recommendations 95 - 96

- Embolden supports the Commissioner's recommendations aimed at ensuring media reporting standards are commensurate with a domestic, family and sexual violence-informed and trauma-informed approach.

Chapter 6 – Supporting Victim Survivors

Embolden welcomes the Report's emphasis on flexibility, with supports to be driven by individual needs to respond effectively to the diverse experiences of victim-survivors, and for services and systems to be accessible, inclusive and safe. Specialist DFSV services need to be included in co-design of service landscape improvements.

While we appreciate the emphasis on statewide services, we caution that these must be expanded or developed in consultation with regional and remote communities and service providers, to ensure that they effectively account for the unique needs of regional and remote victim-survivors and the regional and remote service context.

Meeting the needs of victim-survivors

Recommendations 97 – 102

- The sector comments the Report's recommendation for the development and implementation of a flexible funding model to meet the needs of victim-survivors (recommendation 97). We support the emphasis on this funding being separate to funding that is already available through housing outcomes and the Leaving Violence Program. The loading for regional and remote victim-survivors is particularly welcome to cover the real cost of services and supports in these areas.

- Embolden supports the development of separate victim-survivor referral networks for adults and for children and young people (recommendation 98), along with funding the establishment and commissioning of services not currently available (recommendation 99). A statewide approach will also require co-design with regional and remote service providers, to ensure that capacity to accept referrals and the unique service delivery context for these services is taken into consideration.
- Embolden welcomes recommendation 100 to consider legislative reform to remove parental consent as a barrier to help seeking and service access for children and young people.
- A need for review of statewide accessibility of child and youth mental health/DFSV health services with oversight by the Implementation and Impact Monitor (recommendation 101) is consistent with Embolden's understanding of service gaps, and regional accessibility issues. We urge the State Government to commission this review as a matter of priority. Embolden members have noted that broader government policies intersect with young people's needs and access to services, including Centrelink and concessions (e.g. Ambulance-related costs).
- There is a significant need for an increase in funding for FTE for domestic, family and sexual violence services targeted to children and young people, both within and outside the health system. Youth health responses, such as the Young Fathers Program run by Metropolitan Youth Health Service, must support an approach that is dynamic, community-based, multi-disciplinary and linked with therapeutic responses, and recognises that young people are also using violence. The current funding directed to services for victim-survivors of child sexual abuse is inadequate.
- The DFVSA welcomes recommendation 102 for a review and funding uplift for Safe at Home, to enhance program access and safety outcomes for a broader range of people experiencing violence statewide.

Accommodation and housing

Recommendations 103-110

- The DFVSA and broader specialist sector welcomes the Commission's recognition of the unsuitability of the current accommodation infrastructure to support all victim-survivors of domestic, family and sexual violence, including the inadequacy of purchased accommodation (Emergency Assistance Program) and the dearth of housing exit pathways.
- We note that there is an existing register of domestic and family violence housing associated with DFVSA, and a state-wide process to access transitional and supportive housing, but that this is far beneath levels required to meet demand, and to support different family make-up.
- The member services of the DFVSA must be integrally engaged in the development of the terms of the audit of available crisis, emergency and transitional accommodation for people experiencing domestic and family violence (recommendation 103), the development and implementation of the accommodation register (recommendation 104) and the development and implementation of a 10-year accommodation investment plan (recommendation 105). In relation to recommendation 104, it is important that regional and remote victim-survivors are not disadvantaged through an expectation that they be accommodated far from their community. Proximity and connection to community and supports, alongside safety, must be maintained as core principles.
- The sector commends the Commission's recognition of the need for Aboriginal-led services and accommodation across the state (recommendation 106).

- While we welcome the specific recommendation regarding the support available to children and young people within DFVSA (recommendation 109), we encourage the State Government to look more broadly at the supports and accommodation available and the frameworks within which these are delivered (for example, the recent framework developed by Finders University), and consider the specialist skills and capacity of staff to work with children and young people as victim-survivors in their own right, in a developmentally appropriate manner.

Accessible, inclusive and culturally safe services

Recommendations 111 – 113

- While Embolden recognises that the Commissioner for Equal Opportunity holds the statutory authority to address discrimination and promote equal opportunity, we have some reservations about recommendation 111. Firstly, we are concerned that formal accreditation frameworks, rather than practice standards and guidance, may place too great a burden on frontline services (particularly small organisations), in the current context of significant service pressures and broader system reform. Whether the lever for change is formal accreditation or guidance to build capability, we are not convinced that the Commissioner is best placed to lead the development of practice standards for specialist domestic, family and sexual violence services. In our view, this is a role for sector peaks – SAACCON and Embolden – in close partnership with the peak and representative bodies for relevant groups/communities (for example, SA Rainbow Advocacy Alliance). Additionally, the real cost to service providers, in terms of human and financial resources, will also need to be factored into the design process.
- Embolden is pleased to see specific recommendations around ongoing funding for specialist LGBTIQ+ DFSV workers (recommendation 112) and support for establishing disability liaison officers (recommendation 113).

The court experience for victim-survivors

Recommendations 114 - 123

- In terms of justice services, Embolden welcomes recommendations to establish more vulnerable witness suites in non-court buildings across metropolitan Adelaide (recommendation 114), and the identification of appropriate sites in regional locations (recommendation 115). However, Embolden would have liked to see a firmer recommendation from a regional perspective. It is important to note that locating suits in non-court buildings is equally important in regional areas and, as it stands, there is no impetus for the State Government to establish any vulnerable witness suites regionally. This risks compounding the disadvantages that regional victim-survivors experience in accessing safe and supportive services across the system.
- Embolden strongly supports the Report's recommendation to develop safety standards for court infrastructure that adequately meet the needs of victim-survivors of DFSV informed by lived experience and the Commissioner for Victims' Rights (recommendation 116), with an accompanying capital works plan and established fund for meeting minimum standards in a staged approach (recommendation 117).
- Embolden's submission highlighted significant gaps in information sharing that are currently exacerbating risk to victim-survivors. In particular, there are issues with the way in which courts share information about court outcomes, including changes to bail and intervention order conditions. Embolden commends the recommendation for the Courts Administration Authority to implement an information sharing mechanism that is accurate, timely, accessible and victim-centred (recommendation 118). Embolden also welcomes the

Commission's focus on the potential for written notice of bail applications as a mechanism for improving safety (recommendation 119).

- Embolden welcomes the recommendation to pilot a peer support program for victim survivors of sexual violence (recommendation 120) based on the evidence of the impact of models like The Survivor Hub. Following evaluation of the pilot's effectiveness, Embolden would also like to see the State Government investigate peer support models for victim-survivors of domestic and family violence, with differentiation for priority populations.
- We know that people living with disability are disproportionately affected by domestic, family and sexual violence, and those with complex communication needs experience additional barriers to engaging safely with services. Embolden strongly supports the resourcing of a witness intermediary scheme for people with complex communication needs (recommendation 121). Funding needs to be ongoing to ensure sustainability.
- Embolden's submission noted that significant delays in court processes are not supportive of victim-survivors. We strongly support the recommendation that the State Government consider the expansion of the Criminal Priority Programme to include major indictable domestic, family and sexual violence offences (recommendation 122). We also appreciate the Commission's attention to the inclusion of coercive control in costing.
- Embolden commends the Commission's consideration of the potential of judge-alone trials, including transparency, and supports the recommendation for the State Government to commission research to consider how judge-alone trials operate in other jurisdictions with a view to assessing suitability for South Australia (recommendation 123).

Chapter 7 – Prevention

Embolden welcomes the Report's approach to the primary prevention of domestic, family and sexual violence, including:

- the focus on gendered drivers, as well as factors that work to exacerbate and intensify violence and abuse;
- recognition that the prevention of violence requires a multi-faceted, coordinated and sustained approach and investment; and
- acknowledgement of the interconnected and complementary relationships across the domains of prevention, early intervention, crisis response, and recovery and healing.

We note the Report's limited focus on primary prevention within universal health services, including opportunities to strengthen access to programs for new fathers/parents that provide support and foster healthy, equal and respectful relationships.¹ Although parenting programs are referenced in relation to recommended community-specific 'saturation model' trials, Embolden urges the State Government to act on the important and timely prevention (and earlier intervention) opportunities through services targeted to new parents at a statewide level.

¹ Embolden's September 2024 submission to the Royal Commission provides the examples of Circle of Security and Baby Makes 3 (p. 15).

Prevention through education systems

Recommendations 124, 125 and 126

- Embolden commends the Commission’s recognition of education systems as a critical site for primary prevention. In our submissions to the Royal Commission, Embolden called for commitment to a long-term vision, approach and funding of evidence-based respectful relationships education (RRE) across South Australia from prep to year 12.
- Embolden also advocated for primary prevention approaches within early childhood education settings,² which is not a focus of the Commissioner’s recommendations. SA’s rollout of universal three-year old pre-school provides a critical opportunity to embed age-appropriate primary prevention approaches in early childhood education settings across the state, as well as earlier identification of families requiring targeted support. It is also important to consider other opportunities for connecting with families, such as the Metropolitan Youth Health Services education programs for young parents.
- The sector supports recommendation 125 - that the Education Standards Board be resourced to develop a best-practice framework for responding to disclosures of domestic, family and sexual violence for schools. Given the sector’s specialist expertise and the identified intersections with the recommended Risk Assessment and Management Framework and central statewide entry point, specialist domestic, family and sexual violence services should be involved in the co-design process of the framework, alongside children and young people with lived experience.

Prevention through a whole-of-community approach

Recommendation 127

- Embolden supports recommendation 127 for ‘saturation model’ trials in two South Australian communities, and notes the compelling evidence cited in the Report in relation to the engagement of boys and men and the protective factors against the use of intimate partner violence.
- We draw the State Government’s attention to the potential implications of this recommendation for local specialist frontline services, including:
 - the resource imposts for services of participation in collaborative partnerships; and
 - likely increases in referrals for support (as noted in the Report)
- The sector welcomes the Commission’s recognition that effective prevention efforts require a skilled and supported workforce. There is a need for targeted investment in the development of specialist prevention work skills within the domestic, family and sexual violence workforce, through education and training pathways, professional support and sustainable career structures. We see a key role for the sector’s peak body in this work, alongside government and tertiary education sectors.
- The Commissioner’s Report refers to establishing a primary prevention Community of Practice led by the sector. We suggest that functions and positions that aim to build service and workforce capacity to deliver effective primary prevention initiatives would appropriately sit with Embolden as the sector peak.
- The examples of community-based initiatives outlined in this section of the Report suggest the benefits of supporting innovative, local prevention activities. Embolden’s submissions echoed the Rapid Review of Prevention Approaches Report’s recommendation of a Prevention Innovation Fund. The State Government

² For example, Sydney’s Women’s and Girls’ Emergency Centre’s ALL IN program, a whole-of-early childhood service project referenced in Embolden’s September 2024 submission (p. 15)

could establish such a fund, potentially in partnership with the Local Government Association, to empower and activate communities in their efforts to prevent domestic, family and sexual violence. We note considerations of flexibility to promote innovation must be balanced against important considerations of evidence-based effectiveness and sustainability.

Prevention through regulation

Recommendations 128 -136

- Embolden commends the Commission's attention to safety-by-design and regulatory levers, to reduce the significant harms caused by alcohol and other drugs, gambling and online environments in their interaction with the gendered drivers of domestic, family and sexual violence.
- Embolden urges the State Government to progress the *Liquor Licensing (Miscellaneous) Amendment Bill 2025 (SA)*, with provisions precisely aligned with Commissioner's recommendations 128 and 129. These elements must not be watered down in the Bill that is introduced to Parliament.
- We also welcome the Commission's focus on the disproportionate impacts of domestic, family and sexual violence, and intersecting experiences of marginalisation and discrimination, for certain groups of South Australians, as well as the importance of addressing gender-based vilification and hate speech.

Please direct any enquiries in relation to this response to:

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