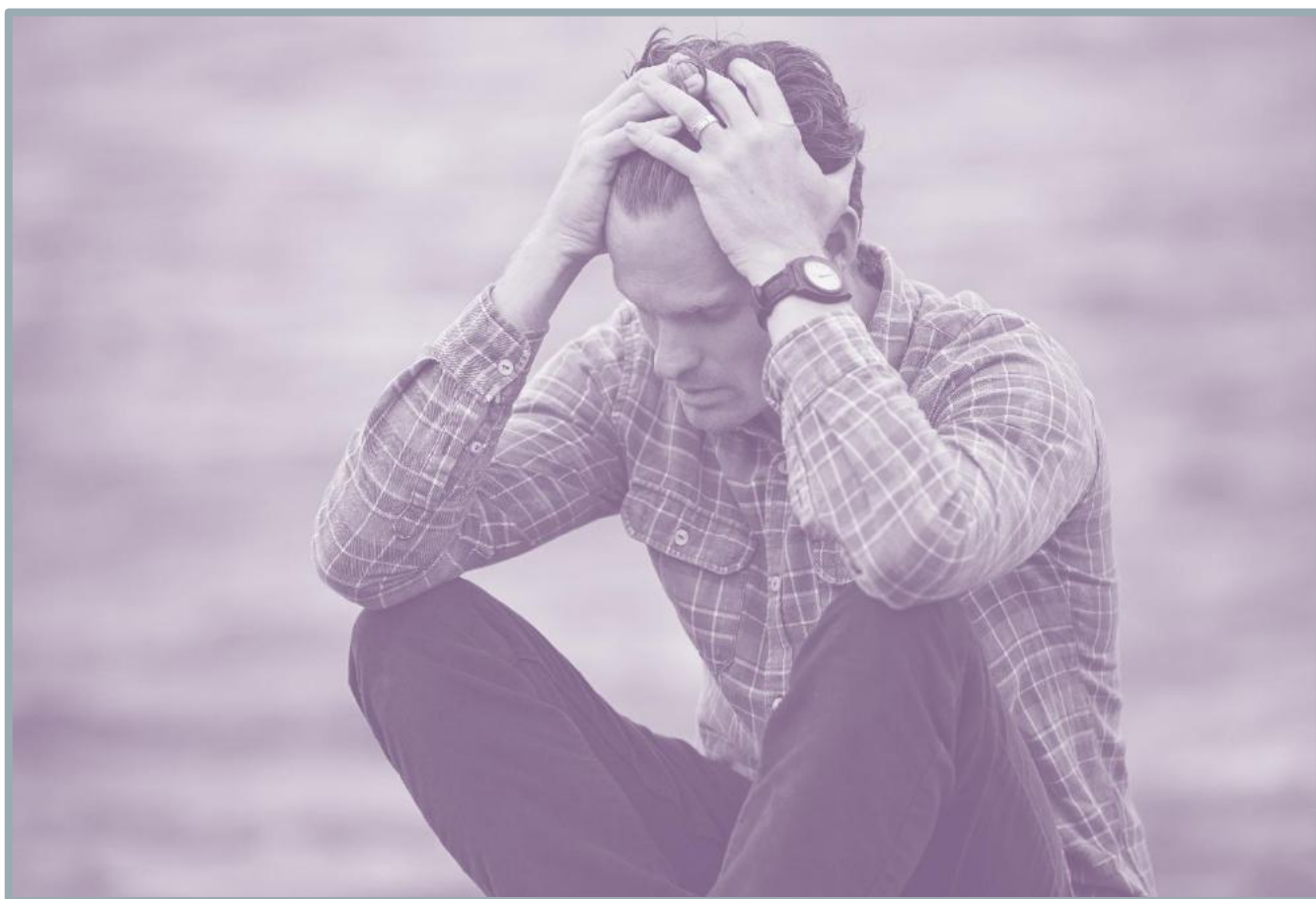


Submission to the Tasmanian Government

*Third Family and Sexual Violence Action Plan
2022-2027: Survivors at the Centre*



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Men's Referral Service – for men concerned about their behaviour

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Acknowledgment of Country

No to Violence acknowledges First Nations Peoples across these lands; the Traditional Custodians of the lands and waters. We pay respect to all Elders, past, present, and emerging. We acknowledge a deep connection with country which has existed over 60,000 years. We acknowledge that sovereignty was never ceded, and this was and always will be First Nation's land.



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About No to Violence

No to Violence (NTV) is Australia's largest national peak body representing organisations and individuals working with men to end family violence. We are guided by the values of accountability, gender equity, leadership, and change.

NTV provides support and advocacy for the work of specialist men's family violence intervention services carried out by organisations and individuals. The work undertaken by specialist men's family violence services is diverse and includes but is not limited to Men's Behaviour Change Programs (MBCP), case management, individual counselling, policy development and advocacy, research and evaluation, training, workforce development and capability building.

NTV also provides a range of training for the specialist men's family violence workforce including a Graduate Certificate in partnership with Swinburne University, as well as professional development for all workforces who come into contact, directly and indirectly, with men using family violence. NTV is a leading national voice and plays a central role in the development of evidence, policy, and advocacy to support the work of specialist men's family violence nationally.

About Our Members

NTV represents 165 members Australia-wide. Our membership structure is inclusive of individuals and organisations ranging from specialist services to individuals and others who have an interest in preventing and responding to men's family violence.

Summary of feedback for consideration

No to Violence offers the following for consideration in the implementation of the Third Tasmanian Family and Sexual Violence Action Plan:

1. Partner with No to Violence to develop standardised risk assessment processes and associated user guides to ensure perpetrators are consistently identified and assessed for risk
2. Establish five year contractual terms for all perpetrator intervention services
3. Contract provisions should provide resources for program planning, monitoring and evaluation, and practice improvement
4. Support the long-term capacity of the newly established Tasmanian Family and Sexual Violence Alliance
5. Electronic monitoring of perpetrators should be accompanied with appropriately resourced, wrap-around, multi-agency services so high-risk offenders receive evidence-based support to change their behaviour and end their use of violence
6. Commission further research and evaluation of the effectiveness of electronic monitoring trials, learning from the limitations of the original Project Vigilance study
7. Consult with No to Violence and perpetrator intervention service providers to understand the extent to which electronic monitoring can and should form part of the intervention landscape
8. Develop and implement in partnership with NTV, a Minimum Standards and a Compliance Framework for all perpetrator intervention service providers.
9. Support No to Violence to work with new and emerging perpetrator intervention services to ensure new providers meet the Minimum Standards
10. In partnership with No to Violence develop an auditing tool to determine compliance with the Minimum Standards
11. Work with No to Violence to develop a workforce development strategy to ensure new and emerging perpetrator intervention providers and facilitators can meet the Minimum Standards
12. Allocate \$7.54 million over five years to establish six new MBCPs across Tasmania
13. Allocate \$4.5 million over five years to keep victim-survivors safe in their home through a Tasmanian specific Men's Accommodation and Counselling program
14. Support the Men's Referral Service to increase its on-the-ground footprint through additional referral pathways and the development of for-purpose awareness raising campaigns
15. Ensure NTV and the perpetrator intervention sector are involved in the co-design of the Outcomes Framework

Executive summary

No to Violence is pleased to provide feedback on the Tasmanian Government's Third Family and Sexual Violence Action Plan 2022-2027: Survivors at the Centre. As the national peak body for organisations and individuals working with men to end their use of family violence, No to Violence welcomes the increased focus on perpetrator interventions and accountability.

With 165 members Australia-wide, including in Tasmania, No to Violence is committed to ending men's family violence through evidence-based interventions. Our Men's Referral Service (MRS) and Brief Intervention Service (BIS) are critical parts of Tasmania's perpetrator intervention landscape. MRS is part of the Safe at Home program, Tasmania's automatic police referral program to connect men who use violence with the support they need to change their behaviour.

The Third Action Plan is an important step in Tasmania's work to end men's family violence. No to Violence has supported the development of this action plan through our engagement in the Family and Sexual Violence Consultative Group and we support the vision set forth in the plan.

Implementing this plan will require increased investment in perpetrator interventions that meet the needs of diverse Tasmanians. Increasing availability and accessibility of evidence-based, tailored programming is an important part of addressing the needs of men to change their behaviour. Our Tasmanian members require additional funding to continue delivering their vital services.

Our members continue to struggle to meet demand. Men's Behaviour Change Programs (MBCPs) are extremely limited in regional and rural areas, and waitlists in urban areas can be months-long. Investing to increase the number of MBCPs is an important step in stopping men's use of family violence. Innovative perpetrator interventions like No to Violence's Men's Accommodation and Counselling Service (MACS) is designed to support men who have been excluded from the home (due for example, to apprehended violence orders) to access safe and dignified housing while getting the counselling support they need to change their behaviour. MACS plays an important role in keeping women safe in their homes while holding perpetrators accountable.

We look forward to working with the Tasmanian Government to implement this Action Plan and to supporting a whole-of-system approach to holding perpetrators accountable and supporting the safety and well-being of victim-survivors.

No to Violence Submission

No to Violence welcomes the opportunity to continue to support the work of the Tasmanian Government's Third Family and Sexual Violence Action Plan 2022-2027: Survivors at the Centre. As a member of the Family and Sexual Violence Consultative Group, NTV has played a key role in ensuring perpetrator accountability remains a core component of this Action Plan.

This submission provides advice into how specific actions identified in the Action Plan can be made reality. The success of perpetrator specific programs articulated in the Action Plan rests on resourcing the specialist sector.

Tasmanian perpetrator intervention services are unable to meet current demand. Our members do not have the resources to deliver services to people who need them. This is particularly the case for Tasmanians in regional areas or who come from diverse backgrounds. Resources are required to meet the immediate demand for Men's Behaviour Change Programs (MBCPs) as well as other innovative programs to support behaviour change.

No to Violence looks forward to continuing to work with the Tasmanian Government to end men's family violence and create a Tasmania free from violence.

Partnership and Transformation

No to Violence commends the Tasmanian Government for its emphasis on partnership and transformation as necessary for the vision of this Action Plan.

No to Violence provides trusted advice to state and territory governments on legislative reform. We have most recently provided advice to the Tasmanian Government regarding stealthing and non-fatal strangulation, advice on criminalising coercive control around Australia, feedback on the National Plan and state strategies, including Tasmania, and other legislative reform issues at put forward by state and territory governments.¹

We strongly support Action 8, efforts to implement legislative reform to strengthen legal responses to family and sexual violence, including through a responsive criminal justice system.

We also have a strong background working closely with Courts and Police in the delivery of training. The criminal justice system must be more conscious of the gendered nature of family violence to respond appropriately.

We recommend the Tasmanian Government continue to work in partnership with the perpetrator intervention sector in the development of legislative reform.

Our members suggest greater attention is required to address financial abuse and coercive control as part of the family violence response infrastructure. Our members also note that greater communication is a priority area for reform, including referral pathways and information sharing between levels of interventions, i.e. primary, early and tertiary.

¹ No to Violence 2022a; No to Violence 2022b; No to Violence 2022c; No to Violence 2022d; No to Violence 2022e; No to Violence 2022f; No to Violence 2022g.

Standardised risk assessment processes

No to Violence supports the Tasmanian Government's interest in developing a standardised risk assessment process through Action 10. Our members note that increased multi-agency collaboration and formal information sharing and referral pathways would support risk assessment and service provision.

No to Violence is well-placed to support the development and implementation of a commensurate risk assessment process, as well as support government and non-government family and sexual violence services to implement new risk assessment practices.

For example, in Victoria, we continue to play an important role in the roll-out of the Victorian Multi-Agency Risk Assessment and Management (MARAM) framework. Our Workforce Development team led the development of the Adult Person Using Violence Risk Assessment User Guide as well as associated training. Developing these guides and supporting practitioners to use the new risk assessment has been an important step in embedding MARAM as part of Victoria's family violence response.

Feedback for Consideration:

1. Partner with No to Violence to develop standardised risk assessment processes and associated user guides to ensure perpetrators are consistently identified and assessed for risk

Building a strong and sustainable sector

Perpetrator Intervention Services must be included in five-year contract provision: Action 12

No to Violence strongly supports the provision of five-year contracts to all service providers as put forward in Action 12. We note, however, that perpetrator intervention programs have *not* been identified as recipients of such contracts.

Longer-term funding for perpetrator intervention service providers will enable better program planning, availability, and opportunities to embed emerging best practice. Our members report that funding uncertainty stifles collaboration because stakeholders cannot plan ahead and be confident about their futures. Short term contracts are often for 'pilot' programs that heighten participant and service provider expectations, and which are often not formally evaluated to support their extension or permanency or expire with the particular one-off grant allocation underpinning them.

Short-term funding cycles contribute to high staff turn-over and the casualisation of the workforce, as well as prevent service providers from fully evaluating programs and implementing the evaluation findings. Participants and their families need certainty in the availability of programs and services that support their safety and security. This compounds the disservice to families and their desire to live free from violence.

Short-term funding and contract cycles make the recruitment and retention of qualified staff challenging. This is more so the case for providers in rural and regional areas, where qualified staff are disincentivised from relocating for six- or twelve-month contracts.

Our members report that short-term funding contracts are a consistent challenge to effective service delivery. Five-year funding contracts, therefore, should be supported with additional resourcing to enable service providers to monitor, evaluate and report on their programs. This would enable the Tasmanian Government to better understand the efficacy of specific interventions.

Funding for services should reflect the quality of practitioners: as requirements for qualifications increase, employment contract terms and conditions should too. These conditions are essential in building a sustainable end-to-end family violence sector. Recruitment and retention campaigns can only go so far without appropriate employment standards and workforce conditions.

Longer term program planning is impacted with short-term contracts. No to Violence members repeatedly report that short-term funding makes it impossible to appropriately evaluate, learn from, and embed learnings into future program cycles.

No to Violence strongly supports Action 12 and calls on the Tasmanian Government to provide increases in funding through the provision of five-year contracts to support program planning, implementation, monitoring and evaluation, and on-going practice improvement.

Feedback for Consideration:

2. Establish five year contractual terms for all perpetrator intervention services
3. Contract provisions should provide resources for program planning, monitoring and evaluation, and practice improvement

Developing a strong, coordinated sector: Action 14

No to Violence strongly supports Action 14 to establish a Tasmanian Family and Sexual Violence Peak. NTV has supported this process through our submission to the Tasmanian Government with our 2022 Budget Proposal.

No to Violence is part of a core group of service providers and policy experts working to support the family and domestic violence sector in Tasmania and fully support the proposal. for TasCOSS to coordinate the Tasmanian Family and Sexual Violence Alliance for Policy Development and Sector Coordination (the Alliance). With thirty years of experience, No to Violence knows the importance of a coordinated and authoritative voice for the family and domestic violence sector.

The Alliance will enable our sector to assist the Tasmanian government in pursuing its agenda for all Tasmanians to be free from family and sexual violence by providing coordinated input into government strategies, legislative reforms and policies, and facilitating sector training and development. .

Tasmania is the only jurisdiction without a coordinated, jurisdiction-wide, non-government specialist sector voice to engage in the development of local and national policy responses relating to family and sexual violence. Establishing this single point-of-contact for the Tasmanian Government with our sector is a critical action to support the implementation of the Third Action Plan.

The Alliance will be well placed to continue its role as a coordinate, authoritative and legitimate voice if it is supported to do so for the duration of this Action Plan and into the future. No to Violence suggest that the Tasmanian Government commit to supporting the long-term capacity of the Alliance so that it is positioned as a key mechanism for achieving a Tasmanian free from family and sexual violence.

Feedback for Consideration:

4. Support the long-term capacity of the newly established Tasmanian Family and Sexual Violence Alliance

Holding Perpetrators Accountable

Tasmania's Third Family and Sexual Violence Action Plan notes that perpetrator interventions are an important part of Tasmania's plan to ensure that every Tasmanian lives free from violence.

Electronic Monitoring of high-risk offenders: Action 7

No to Violence notes with caution Action 7, to continue electronic monitoring of high-risk family violence offenders. No to Violence recognises that electronic monitoring of high-risk perpetrators can be part of a suite of interventions. We caution, however, the over-reliance on electronic monitoring or the expectation that electronic monitoring will have a 100 percent success rate. Electronic monitoring may curtail a person's physical movement by establishing boundaries and exclusion zones, but does not address or prevent coercive and other controlling behaviours. Project Vigilance, a Tasmanian trial of electronic monitoring, provided promising evaluation findings, but gaps in the methodology as well as significant limitations detailed in the evaluation have left questions for our sector. For instance, there is no information on the extent to which participants were engaged in other interventions—such as case management, alcohol or other drug (AoD) programs, or specialist family violence counselling—concurrent with the trial.

The evaluation of Project Vigilance notes that researchers and practitioners interviewed for the project were concerned regarding the lack of support for both perpetrators and victims, noting that it is 'internationally recognised that sanctions work best when coupled with adequate support service for perpetrators, including rehabilitative support in order to change offending behaviour.'² The evaluation further noted that 'some short-term support is available through Men's Referral Services [*sic*] [MRS], it was recognised that [electronic monitoring] would be best coupled with intensive support for perpetrators to maximise skills for behaviour change.'³ While the evaluation did find that overall electronic monitoring works well for perpetrators, it is not sufficient for behaviour change: 'there is some concern over some perpetrators who have moved on from their first victim and found new partners, and in some cases, have had new FVOs served, citing a second victim.'⁴

This demonstrates that electronic monitoring as delivered in Project Vigilance, is insufficient to change behaviour for some perpetrators. If a perpetrator is simply re-directing his victimisation and this is not captured in reporting, this intervention cannot be considered 100 per cent successful.

We ask the Tasmanian Government to consider the role of electronic monitoring as only a part of a broader suite of perpetrator interventions. Electronic monitoring of high-risk perpetrators must be part of a whole-of-system response that seeks to hold perpetrators accountable, change behaviour, and support victim-survivor safety.

No to Violence and our members support a whole-of-system response. This means providing perpetrators with the services they need to stop their use of violence and abuse. We heard from our members that there is a real need for Tasmania to invest in perpetrator interventions outside of carceral settings to create a suite of program offerings that address the intersectional and intergenerational nature of domestic and family violence. More research is required into the efficacy of electronic monitoring of high-risk offenders. It is therefore our view that electronic monitoring may be part of an intervention for some perpetrators, but it should not be the only intervention. High-risk perpetrators who are required to wear electronic monitoring bracelets should also be supported with one-on-one counselling and case management, as well as support through specialised programs such

² Winter et al. 2021, 19.

³ Winter et al. 19–20.

⁴ Winter et al. 20–21.

as Alcohol and Other Drug programs; mental health services; employment services; and housing support.

Feedback for Consideration:

5. Electronic monitoring of perpetrators should be accompanied with appropriately resourced, wrap-around, multi-agency services so high-risk offenders receive evidence-based support to change their behaviour and end their use of violence
6. Commission further research and evaluation of the effectiveness of electronic monitoring trials, learning from the limitations of the original Project Vigilance study
7. Consult with No to Violence and perpetrator intervention service providers to understand the extent to which electronic monitoring can and should form part of the intervention landscape

Develop Minimum Standards for MBCPs

Minimum Standards for MBCPs is an important step for the Tasmanian Government to deliver high-quality perpetrator interventions. Tasmania does not have state-wide minimum standards nor a compliance framework. In order to deliver on Actions 20 and 21 and the overall vision of the Action Plan, a set of Minimum Standards and associated Compliance Framework is required. No to Violence is well-placed to support this process.

The Victorian Minimum Standards for Men's Behaviour Change Programs (MBCPs) were developed by NTV in partnership with Family Safety Victoria. These standards can and have been adapted for different contexts.⁵ No to Violence supports appropriate adaptation and tailoring of programs to better address client need, while also ensuring that service providers adhere to best practice.

Developing a Compliance Framework to accompany a set of Minimum Standards is important in this process. The NSW Compliance Framework for MBCPs sits alongside the NSW Practice Standards.⁶ Service providers should be supported to meet the Compliance Framework as part of contractual obligations.

No to Violence strongly supports the development and implementation of Minimum Standards and Compliance Framework to ensure quality assurance in perpetrator intervention service delivery.

We welcome any commitment to increasing resources for perpetrator interventions. However, this must be accompanied by sustainable and ongoing funding, sound contract terms and conditions, and a requirement that funding is tied to mandatory compliance with relevant minimum standards. Independent and funded evaluation should be embedded in all program delivery. The Minimum Standards dictate, among other things, the levels of training required of MBCP facilitators. If perpetrator intervention service providers are required to meet the minimum standards, they have to be resourced in a way that enables them to do so—including access to evidence-based training.

Feedback for Consideration:

8. Develop and implement in partnership with NTV, a Minimum Standards and a Compliance Framework for all perpetrator intervention service providers.
9. Support No to Violence to work with new and emerging perpetrator intervention services to ensure new providers meet the Minimum Standards

⁵ Tangentyere Council 2020

⁶ NSW Department of Justice 2018

10. In partnership with No to Violence develop an auditing tool to determine compliance with the Minimum Standards
11. Work with No to Violence to develop a workforce development strategy to ensure new and emerging perpetrator intervention providers and facilitators can meet the Minimum Standards

New and additional funding to increase availability of MBCPs: Action 20

Action 20, to continue to deliver perpetrator programs, is central to a Tasmania free from family violence.

To deliver this vision, Tasmania's perpetrator intervention sector requires additional resources. Our members are concerned that current funding levels impact their capacity to meet demand, and that regional and rural areas, particularly in the North, Northwest, and South of Tasmania, lack specialist programs.

As part of our pre-budget submission to the Tasmanian Government, No to Violence sought an injection of \$7.54 million over five years to develop and implement six new MBCPs. No to Violence reiterates the importance of this investment for the implementation of this Action Plan.

Men's Behaviour Change Programs (MBCPs) are part of the primary response to perpetrators of family violence. Investing in a well-funded, innovative, and evidence-based MBCP sector means getting more services to more men who need them and within a timeframe that is appropriately proximate to their help seeking or referral, to ultimately, keep more women and children safe.

Without long-term secure funding, our sector struggles to meet service delivery requirements and improve on current offerings, stymieing innovation. Long-term funding supports service providers to improve their offerings through the recruitment and retention of skilled staff, implementation of best practice risk responses, innovating and piloting new programs, and conducting program evaluations. Evaluating existing and new programs embeds opportunities to build the evidence base, strengthening the sector overall.

NTV's members report that Tasmania's MBCP providers are concentrated in urban areas. There are few programs available for men in rural or remote areas, programs in urban areas often have long waitlists, and the availability of tailored programs for Aboriginal people or men with diverse backgrounds are extremely limited. As a key service provision, MBCPs must be available and accessible to people who need them, including within an appropriate time frame and in a geographic location that supports their help-seeking. This includes accessible programming for people living in rural and regional areas.

Our members urgently need funding of \$7.54 million over five years, to establish additional and much-needed MBCPs in the North, Northwest, and South of Tasmania as well as in urban centres including Hobart and Launceston. No to Violence recommends that these programs be open to both mandated and self-referred men to offer early entry points to behaviour change for men who use violence. Establishing new programs in priority areas will enable people who have previously been unable to access interventions to take accountability for their violence and begin their change journeys.

For MBCPs to appropriately respond to risk and support behaviour change for perpetrators of violence, they must include the following ancillary service components:

- Pre-group work including motivational interviewing to ensure MBC group readiness

- MBC group work (20 weeks)
- 1-on-1 case management for men engaged in group work who have complex needs
- Family safety/partner contact work
- Comprehensive risk assessment and response

Additional resources to support family safety contact work as part of existing and any new MBCPs is required and should be appropriately resourced. Funding is required to support the training and practice development of family safety contact workers, resource the day-to-day operations of family safety contact, and ensure that family safety contact commences while men are on waitlists and can continue throughout the duration of the program.

Establishing six new programs with case management and family safety contact would enable significantly more men to participate in important behaviour change programs over five years.

Court Mandated behaviour change programs as part of a family violence order: Action 21

No to Violence supports mandated behaviour change for perpetrators of family violence. We note, however, that mandated programs can be implemented only so far as programs are available, appropriate, and accessible for the men who need them.

To fully operationalise this proposal, additional resourcing of the perpetrator intervention sector will be required along with a range of other interventions that are complementary to men's behaviour change programs as not all men are suited to engage in these programs.

There is a need to extend the number of intervention sites and providers gradually and progressively in conjunction with a workforce development strategy aligned with Minimum Standards. Our response above provides important guidance for implementing mandated programs.

The particularities of court attendance and mandated program attendance for people living in regional and rural areas will need to be taken into consideration. Accessibility means programs are not just physically accessible, they must be culturally safe, appropriate, and relevant to the lived experiences of participants. We ask the Tasmanian Government to increase the total amount of funding available for MBCPs and other perpetrator interventions, including targeted delivery in regional areas.

Feedback for Consideration:

12. Allocate \$7.54 million over five years to establish six new MBCPs across Tasmania

Housing for perpetrators

The Action Plan notes that Tasmanians are facing a housing crisis. The Action Plan highlights various policy frameworks that aim to increase housing availability for victim-survivors--but does not consider programs to remove perpetrators from the home. Concerns about the availability of safe housing, separate from perpetrators was repeatedly raised by our members. No to Violence has previously asked that the Tasmanian Government invest in a program to keep victim-survivors safe in their homes while supporting perpetrators to change their behaviour. We echo that sentiment here.

No to Violence operates the Men's Accommodation and Counselling Service (MACS) in Victoria. MACS enables men who have been legally excluded from the home to find stable accommodation and counselling support after being served an exclusion order and breaches of legal orders. An evaluation

of MACS found that it fills an important gap in the service delivery system.⁷ MACS keeps these men in view of the system while offering them a safe alternative to breaching their court orders; this, in turn, allows victim-survivors to safely remain in the home while perpetrators access the support they need to stop their violent and abusive behaviours.

Through discussions with our Tasmanian sector partners and through Government-commissioned evaluations, No to Violence understands that there are limited options available for victim-survivors or perpetrators experiencing homelessness or housing insecurity due to domestic and family violence.⁸ There is no emergency housing for people who use family violence.⁹ Hundreds of women and children are turned away from women's shelters every month, and nearly three-quarters of people turned away from specialist homelessness services are women.¹⁰ An ABC report cited figures from the Hobart Women's Shelter stating that of the 1,029 women and children seeking support between July 2021-April 2022, approximately 800 (78 per cent) were unable to be accommodated. There is additional pressure as a result of rising rents, and Tasmania has consistently had low rental availability with limited opportunity for locals to enter the property market.¹¹ In the context of domestic and family violence, the lack of safe, accessible, and affordable housing support for both women and children, and men who use violence, significantly exacerbates victim-survivor risk and safety.

Implementing a for-purpose program like MACS will enable the Tasmanian family violence sector to keep men who choose to use violence in view while providing them with the secure accommodation and counselling support they need to interrupt their use of violence and reduce their risk of ongoing perpetration—all while enabling women and children to remain safe in their homes.

No to Violence seeks funding for the development and design of a Tasmania specific accommodation and counselling response for perpetrators of family violence—including those in regional areas.

Bringing the successful MACS program to Tasmania will enable men who are legally excluded from the home to access accommodation and counselling support, while women and children can stay safely in their home

Feedback for Consideration:

13. Allocate \$4.5 million over five years to keep victim-survivors safe in their home through a Tasmanian specific Men's Accommodation and Counselling program

Prevention and early intervention

Early intervention: Action 25

No to Violence supports Action 25, an expanded Step Up Adolescent Early Intervention Program to provide early intervention for adolescents that use violence in their families and with intimate partners. Our members advise that Step Up would be more successful as part of a suite of interventions that include early intervention for children experiencing family violence in order to

⁷ Ernst and Young 2021

⁸ Winter et al. 2021

⁹ Winter et al. 2021

¹⁰ Coulter 2022

¹¹ Bevan 2021

break the cycle of intergenerational family violence. One member noted that targeted whole-of-family approaches are required to address the intergenerational nature of family violence and the specific impacts of adolescent violence in the home. Members also emphasised the importance of tailored referral pathways as part of youth intervention. We recognise that while some supports for children experiencing family violence are available, our members identified that targeted programs are needed in order to achieve the Action Plan's objective of a Tasmania free from family and sexual violence. No to Violence supports evidence-based early intervention programs and looks forward to supporting the Tasmanian Government in expanding this important resource for young people seeking to change their behaviour.

Supporting men on the path to behaviour change: Action 30

No to Violence strongly supports Action 30, the continued delivery of Men's Referral Service (MRS) in Tasmania.

MRS offers specialist phone counselling and referrals to men who are concerned about their behaviour or who have been identified by the criminal justice system as using violence and abuse. MRS is a critical part of Tasmania's perpetrator intervention infrastructure. From September 2021 to August 2022, MRS supported 100 men and received more than 1,800 referrals through the Safe at Home automatic referral pathway. While these numbers represent growing awareness about MRS, we know that too many men are not getting the support they need to change their behaviour.

Increasing awareness of MRS will enable more men to reach out and receive help. This increases the likelihood of connecting men with the services they need *before* they come into contact with the criminal justice system. Increasing resources to MRS to develop specific awareness-raising campaigns in Tasmania would support this early intervention.

Importantly too, the Men's Referral Service should be appropriately resourced to provide culturally safe support and service referrals, with telephone service delivery to remote areas, including Aboriginal and Torres Strait Islander communities. NTV will continue to work collaboratively with Aboriginal Community Controlled Organisations (ACCOs) and community-led organisations to co-design pathways to support access to MRS. We will also continue to develop relationships to ensure MRS is able to refer Aboriginal and Torres Strait Islander clients as well as clients from culturally and linguistically diverse backgrounds to safe, informed, and where possible, community-led services.

With increased investment in perpetrator interventions under Actions 20 and 21, MRS will then be able to refer more Tasmanians to the services they need to change their behaviour.

Feedback for Consideration:

14. Support the Men's Referral Service to increase its on-the-ground footprint through additional referral pathways and the development of for-purpose awareness raising campaigns

Measurement and evaluation

No to Violence supports the Tasmanian Government's commitment to develop an Outcomes Framework as part of the program of measurement, evaluation and learning to ensure that the Action Plan is effective in its aims.

No to Violence asks that the perpetrator intervention sector be involved in the co-design of any Outcomes Framework, and to ensure data on perpetrators, perpetration, and perpetrator interventions are tracked during this Action Plan.

Feedback for Consideration:

15. Ensure NTV and the perpetrator intervention sector are involved in the co-design of the Outcomes Framework

Conclusion

No to Violence welcomes the opportunity to continue our work in supporting the Tasmanian Government to ensure all Tasmanians are safe, equal and respected, and that their homes, families and communities are free from all forms of family and sexual violence.

This Action Plan is an important step in ending men's family violence in Tasmania. We ask that considerations be given to investing in high-quality, evidence-based perpetrator interventions through the provision of new and additional funding and minimum five-year contracts as a priority under this Action Plan.

No to Violence has the expertise and experience necessary to assist the Tasmanian Government to develop and participate in initiatives or programs to ensure perpetrators are held accountable and supported to change their violent and abusive behaviour. We have provided our feedback for your consideration in this submission aimed at strengthening the sector and providing an appropriate mix of interventions and supports. These considerations include developing standardised risk assessment procedures, a Minimum Standards and a Compliance Framework for perpetrator interventions; appropriate resourcing for the Tasmanian Family and Sexual Violence Alliance for Policy Development and Sector Coordination; five-year contracts for perpetrator intervention; increasing quality, availability and accessibility of perpetrator interventions to ensure men can access the support they need to change their behaviour.

No to Violence looks forward to continuing our work to support and collaborate with the Tasmanian Government in creating a Tasmania free from violence.

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