

**OUEENSLAND** 

Bec Shearman
Manager, Service System Reform
Office for Women and Violence Prevention
Department of Justice and Attorney-General

## **Perpetrator Intervention Services Requirements**

#### **Dear Bec**

We write to you as the Steering Committee for the Services and Practitioners for the Elimination of Abuse Queensland (SPEAQ), representing the wider SPEAQ network of individual and organisational members. Following the release of the new *DFV Support Services Investment Specification* and *Perpetrator Intervention Services Requirements* published in July 2021, the Steering Committee has come together to highlight some key concerns relevant to the implementation of the new regulatory guidance governing the perpetrator intervention groupwork space.

SPEAQ has been involved in good faith consultation with the understanding that these revised requirements would be discussed in individual service contractual agreements and therefore each organisation would be able to negotiate and advocate in regards to resourcing implications of these changes. With the new requirements now placed into the investment specification and attached service requirements document (therefore mandatory), SPEAQ members hold concerns that bypassing individual service contractual negotiations will have significant implications for the future viability of these programs based on current funding agreements. Below, we bring attention to several key issues identified within the new service requirements.

## Section 1. Group Readiness/Waitlist Management

Section 1.1 of the *Perpetrator Intervention Services Requirements* details that services must "keep in contact with participants following their assessment for group participation and until group sessions commence". Some services may have clearly articulated strategies to comply with Section 1.1 with referring partners completing intake with participants and continuing to case manage and monitor participants and share information whilst they are on a program's waitlist. However, for services that do the intake themselves, they may currently not have the resources to maintain contact with participants whilst they are on a waitlist - which can be upwards of 100-150 men at any one time. Some services also do not hold a waitlist and the responsibility of maintaining contact rests with the participant, with appropriate referrals in the interim. We, as a committee representing the wider network, believe that the majority of services currently do not have adequate resources to comply with Section 1.1 as it is written.

SPEAQ acknowledges the additional funding provided to No To Violence (NTV)' *Brief Intervention Service* to offer 6 phone-based sessions to men on a waitlist for a perpetrator intervention group program in Australia. However, we also see more value in programs delivering this support directly to men, enabling increased capacity to assess and respond to risk whilst a participant is on the waitlist. SPEAQ supports strong local-based intervention that is embedded in regional integrated service systems, the key principle of Duluth's evidence-based coordinated community response model. By relying on external agencies such as the nationwide NTV and statewide DVConnect Mensline providing this support to men, we are also reliant on their ability to obtain consent and share information with us, or share information without consent under Part 5A of the Domestic and Family Violence Protection Act 2012. They are also only able to engage with men who call them, rather than group programs having the ability to call men directly whilst they are on the waitlist with adequate resourcing.

Recommendation 1: Guidance be provided on what 'articulated strategies' mean in this context, and what level of contact is required with men on the waitlist.

Recommendation 2: Investment be provided to DJAG funded group programs to hold and strengthen the monitoring of risk of men on a program's waitlist, including providing group-readiness programs and brief intervention support.

## Section 2. Duration of Group Programs

The SPEAQ Steering Committee supports the minimum requirements of DJAG funded group programs to be delivered weekly, for a minimum of 32 hours, and over a minimum period of 16 weeks. However, we also see the value in early perpetrator intervention and group-readiness group programs, that do not replace programs that aim to invite men into an in-depth and sustained behaviour change process, but do still meet an important need in the integrated service response and should be considered within existing funding arrangements.

Secondly, we hold concerns for the impact that COVID-19 has on this, with services restricted at times in 2021 to individual phone sessions due to social distancing restrictions or an extended lockdown. Without clear assurance of a return to a pre-pandemic ease of restrictions in 2022, we request guidance on how the impacts of COVID-19 will be reflected in these mandatory requirements and our compliance with them. For example, a service may be able to provide men with engagement with support over a period of 16 weeks, but this may include a mixture of phone and group intervention due to snap lockdowns. And it would be unlikely that a service could comply with the 32 hour minimum if delivering interim phone support within that 16-weeks.

Recommendation 3: DJAG considers compliance requirements at an organisational level for brief/early perpetrator intervention services, with a focus on safety and embeddedness in an integrated service response.

Recommendation 4: Advice for perpetrator intervention services to inform service level business continuity planning, in the context of COVID-19 pandemic, be provided.

Recommendation 5: The *Perpetrator Intervention Service Requirements* identify how these requirements should be understood and complied with in the context of COVID-19 pandemic.

Recommendation 6: Additional COVID-19 crisis funding be directed into all DJAG funded group programs to deliver substantial phone-based intervention to men on the program in the event of a lockdown.

## Section 6. Victim Advocacy

We understand that the majority of services are complying with Section 6.13, making contact with victims/partners after he has commenced a group, and typically hold a caseload of 50-60 women at any one time (example, if a service runs 4 groups). However, Section 6.12 of the *Perpetrator Intervention Services Requirements* detail that the Victim Advocate must also make contact with the aggrieves after the perpetrator's initial assessment, if it meets certain thresholds relevant to risk as outlined. SPEAQ are concerned with the level of risk held by Victim Advocates with already large caseloads and the impact this has on safe and effective practice, and the increased burden to their workload that complying with Section 6.12 would see. A service may have upwards of 100 men on a waitlist and these men may have multiple aggrieved to be contacted. Many services also are only able to fund victim advocates in a part-time capacity. Therefore, SPEAQ believes that services are not currently funded adequately to meet Section 6.12.

Recommendation 7: Increased investment in victim advocate roles to increase capacity to provide support to women linked to men on a program's waitlist in order to comply with Section 6.12.

## Section 7. Observer Requirements

SPEAQ appreciates the clear guidance in Section 7 of the *Perpetrator Intervention Services Requirements* around the different types of observers and number of observer sessions required as a service. As well as the requirements for Victim Advocates to observe 6 sessions. We also welcome the clear direction to utilise video observations where possible, which will especially be of benefit to rural services who are not able to source the different types of observers including Senior Facilitators locally. However, we remain concerned that this number is still too high for those of us running 4+ groups simultaneously with different co-facilitation teams (eg 6 observations x 4 groups = 24 observers required over 16 weeks). While we are hopeful that community interest and partner relationships will assist services in meeting these 6 required observation sessions for each group, this still may not be achievable without clear incentive. Services across the board do not have the funds to pay for external observers.

# Recommendation 8: Services be able to count observation hours towards their service outputs, to encourage external observations and compliance with Section 7.

Further SPEAQ believes that the coordinating and sourcing of observers is a greater expectation than our current model, without additional resources provided to Program Coordinators to organise this. Coordinating external observations requires building and maintaining partnerships, getting signed confidentiality agreements, possibly video recording sessions and obtaining required participant consent, and obtaining and responding to the subsequent observer feedback.

Recommendation 9: Increased investment in program coordination/administrative support for services to assist in complying with Section 7.

## Yours sincerely,

## **The SPEAQ Steering Committee**

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Co-Convenor, SPEAQ Steering Committee; Men's Program Coordinator, Brisbane Domestic Violence Service (BDVS), Brisbane.

#### **Pamela Robertson**

Co-Convenor, SPEAQ Steering Committee; Program Manager and Facilitator, YFS Ltd, Logan.

## April O'Mara

Manager Practice and Governance Research, Centacare, Brisbane.

## **Brett Hayes**

Men's DFV Program Coordinator and Facilitator, Edon Place, Bundaberg.

#### **Emma Crooks**

Area Manager, Centacare, Gold Coast/Beenleigh/Logan.

#### **Joanne Trentin**

Quality and Practice Manager, UnitingCare Community, Brisbane.

## **Michelle Royes**

Research, Compliance and Inclusion Manager, DVConnect, Queensland.

## Verity Bennett,

CEO, North Queensland Domestic Violence Resource Service (NQDVRS), Townsville

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## **Paul Monsour**

Secretary, SPEAQ.

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