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| Family Violence Flexible Support Packages (FSPs)  Program guidelines |
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| To receive this publication in an accessible format phone (03) 9194 3200, using the National Relay Service 13 36 77 if required, or [email Family Safety Victoria](mailto:reception@familysafety.vic.gov.au) <reception@familysafety.vic.gov.au>  Authorised and published by the Victorian Government, 1 Treasury Place, Melbourne.  © State of Victoria, Australia, Family Safety Victoria July 2021.  Available on the [Family violence page](https://providers.dhhs.vic.gov.au/family-violence) of the DHHS Service Providers’ website <https://providers.dhhs.vic.gov.au/family-violence>  In this document, ‘Aboriginal’ refers to both Aboriginal and Torres Strait Islander people.  The Victorian Government proudly acknowledges Aboriginal people as Australia’s First Peoples and as the Traditional Owners and Custodians of the land and waterways upon which we depend. We acknowledge Victoria’s Aboriginal communities and culture and pay respect to their Elders past and present.  Aboriginal culture is founded on a strong social and cultural order that has sustained up to 60,000 years of existence. Victorian Aboriginal communities and peoples are culturally diverse, with rich and varied heritages and histories. The impacts of colonisation – while having devastating effects on the traditional life of Aboriginal Nations – have not diminished Aboriginal people’s connection to country, culture or community.  The Victorian Government recognises the long-standing leadership of Aboriginal communities in Victoria to prevent and respond to family violence, supported through self-determination and self-management, to improve outcomes for Aboriginal people and families, whilst also acknowledging the devastating impacts and accumulation of trauma across generations as a result of colonisation and the dispossession of land and children. |
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# Preamble

These guidelines were produced by Family Safety Victoria in conjunction with other Victorian Government agencies, community service organisations and Aboriginal Community Controlled Organisations (ACCOs) to support the consistent delivery of the family violence Flexible Support Packages (FSPs) in Victoria.

These guidelines are subject to change.

# Purpose of Flexible Support Packages

Flexible Support Packages (FSP) aim to deliver personalised and holistic responses to assist adult and child victim survivors experiencing family violence to transition from crisis, and establish long-term sustainable arrangements to improve their safety, wellbeing and independence in recovery from family violence.

Individualised packages provide flexible brokerage to victim survivors to purchase a range of tailored and practical supports based on their case management/support plan. This may include counselling, wellbeing, education, employment, financial counselling, transport, housing stability, financial security, and other practical or material needs.

# About these program guidelines

## What is the purpose of these program guidelines?

The purpose of these program guidelines is to provide Flexible Support Package (FSP)service providers and practitioners applying for FSPs on behalf of victim survivors with detailed information about Flexible Support Packages (FSP), to ensure consistent delivery of the program in Victoria. These guidelines are relevant to all agencies, organisations, service providers and other stakeholders responsible and involved in the delivery of FSP responses in Victoria.

The program guidelines outline:

* the principles that underpin FSPs
* the FSP model, and components of a FSP response
* roles and responsibilities of stakeholders involved in the delivery of FSPs
* operational and governance arrangements for the FSP program.

The program guidelines aim to:

* enable a shared understanding across Victoria of the purpose and role of FSP responses in supporting victim survivors of family violence
* provide detailed information for key stakeholders about the FSP model and its core components
* improve understanding and engagement of all stakeholders to increase safety and improve responses for victim survivors
* ensure a consistent statewide approach for victim survivors receiving a FSP response across Victoria.

Agencies are required to continue to operate within existing legal, policy and practice frameworks, and to continue to align service provision, as relevant, with the Multi-Agency Risk Assessment and Management Framework ([MARAM](https://www.vic.gov.au/maram-practice-guides-and-resources)) and [Information Sharing Schemes](https://www.vic.gov.au/family-violence-information-sharing-scheme), the [Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors](http://dvvic.org.au/members/practice-development/) (2nd Edition)[[1]](#footnote-2) and any new family violence program guidelines as they are developed.

The program guidelines should be read in conjunction with the following documents:

Personal Safety Initiative operational guidelines: <https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines>

## How do these program guidelines relate to existing policies and practices?

These program guidelines should be read in the context of relevant legislation and organisational policy in relation to family violence. The program guidelines do not replace or override individual or collective responsibilities of agencies, organisations or individuals. Agencies are required to continue to operate within existing legal, policy and practice frameworks.

The *Service agreement requirements* provide guidance for organisations who hold a service agreement with the Department of Families, Fairness and Housing. Organisations are required to comply with the specific departmental policies contained in the requirements.

[Service agreement information requirements](https://fac.dhhs.vic.gov.au/service-agreement-requirements) - <https://fac.dhhs.vic.gov.au/service-agreement-requirements>

A broad range of family violence reforms are currently underway in Victoria which will inform future service delivery and practice approaches across family violence and community services, including FSP. These reforms include:

* Child and Family Violence Information Sharing Schemes
* MARAM (victim survivor and perpetrator practice)
* enhanced perpetrator responses
* design and delivery of The Orange Door
* integration with other service system responses such as mental health, housing and homelessness, child and family services, and drug and alcohol services.

### MARAM and Information sharing reforms

#### Family Violence Multi-Agency Risk Assessment and Management (MARAM) Framework

The MARAM Framework provides policy guidance to organisations that have responsibilities in assessing and managing family violence risk, including those that have been prescribed under regulation as Framework organisations.

The MARAM Framework aims to establish a system-wide shared understanding of family violence. It will provide information and resources that professionals need to keep victim survivors safe, and to keep perpetrators in view and hold them accountable for their actions.

Further information, including a copy of the MARAM Framework and Practice Guides, is available on the [Victorian Government website](https://www.vic.gov.au/family-violence-multi-agency-risk-assessment-and-management) <https://www.vic.gov.au/family-violence-multi-agency-risk-assessment-and-management>.

#### Child Information Sharing (CIS) Scheme

This scheme enables prescribed organisations and services to share information with each other to promote the wellbeing and safety of children, including in situations where family violence is suspected or established as being present.

#### Family Violence Information Sharing (FVIS) Scheme

This scheme enables prescribed organisations and services to share relevant information to facilitate assessment and management of family violence risk to children and adults.

Further information, including a copy of the Family Violence Information Sharing Ministerial Guidelines, is available on the [Victorian Government website](https://www.vic.gov.au/family-violence-information-sharing-scheme) <https://www.vic.gov.au/family-violence-information-sharing-scheme>.

# Principles

Family violence is underpinned by gender-based oppression, structural inequalities and an imbalance of power. Family violence is a choice by a perpetrator for the purposes of power and control. Perpetrators of family violence use coercive tactics and violent, controlling behaviour to gain power over one or more victim survivors. Responsibility for the use of violence rests solely with the perpetrator, and victim survivors are not to be blamed, held responsible or placed at fault[[2]](#footnote-3).

The following principles provide a framework for Flexible Support Packages (FSPs) and should be read in conjunction with the MARAM Framework principles, and the Personal Safety Initiative guidelines where relevant.

## Risk and safety focus

Prioritising safety and stability for victim survivors (including children and young people) is paramount. The FSP aims to assist victim survivors to transition out of crisis, stabilise, improve their safety and support their recovery from family violence.

Additionally, the PSI aims to support victim survivors to remain safely in, or return safely to, their own home and community.

In practice this means:

* a victim survivor who is receiving a case management response can be supported in identifying how an FSP and/or PSI will address safety and security goals and sustainably assist in managing family violence related risk. This includes exploring specific risk and safety considerations for children and young people
* a victim survivors’ circumstances are thoroughly assessed to ensure any FSP response will not increase risk to victim survivors, including children and young people. FSP providers will seek further information where necessary
* victim survivors will receive ongoing risk assessment and risk management support until the full FSP application process is complete, with recognition that family violence risk may escalate or change in severity and/or frequency over time, potentially impacting and changing the suitability of FSP requests
* any packages for victim survivors living with adolescents who use violence or perpetrators is focused on responses that will minimise risk to victim survivors, ensuring that responses do not escalate, reward or reinforce abusive behaviours.

## Person-centred empowerment

Victim-survivors are supported to experience meaningful empowerment through person-centred and flexible service responses.[[3]](#footnote-4) Agencies acknowledge, respect and uphold the strengths, choices and best interests of victim survivors, where it is safe and possible to do so.

In practice this means:

* victim survivors are empowered to lead and make informed choices about the package, supports they need to meet their goals, improve their wellbeing and safety, and recover from family violence
* victim survivors are listened to and their perspective and concerns about the level of risk posed to them are key considerations when assessing risk and the appropriateness of an FSP/PSI response[[4]](#footnote-5)
* victim survivors are treated with dignity and respect and are supported to meaningfully experience their own empowerment and restore control over their lives
* Victim survivors are provided with an FSP response that can remain financially sustainable in the long-term – i.e. a victim survivor can afford any ongoing costs without ongoing FSP interventions
* victim survivors have choice and are supported to remain safely in, or return safely to, their home and community, where suitable and appropriate
  + victim survivors are provided with clear, relevant and easy to understand information to assist them in understanding the FSP (and PSI) models of support, provide their views and to give informed consent for an FSP (and PSI) response.Perpetrator accountability

The use of violence is a choice, and it is important that people who use violence are held accountable for their behaviour through informal and formal social and legal sanctions.

In practice this means:

* service system responses focus on actions that keep perpetrators in view and hold perpetrators to account for their use of violence
* stakeholders work reflectively to ensure that the language and practices of the service system avoid victim survivor blaming, and place responsibility with the perpetrator
* stakeholders work collaboratively to keep perpetrators in view, including through the use of information sharing schemes when legally applicable, to support effective assessment and management of family violence risk
* misidentification of applicants (i.e a perpetrator positioning themselves as a victim survivor, or a victim survivor being identified as a perpetrator) is corrected and minimised by the use of information sharing schemes when legally applicable
* avoidance of FSP responses which may directly ‘reward’ the perpetrator for their behaviour, or be utilised to promote further abuse to a victim survivor

## Inclusion and equity

All victim survivors have the right to access system and service responses that are inclusive and respectful of their history, background, culture and individual circumstances and experiences.[[5]](#footnote-6)

In practice this means:

* services and responses provided to people from Aboriginal communities should be culturally responsive and safe, recognising Aboriginal understanding of family violence, and rights to self-determination and self-management, and take account of their experiences of colonisation, systemic violence and discrimination and recognise the ongoing and present-day impacts of historical events, policies and practices
* factors that may impact on the assessment and management of risk for victim survivors from culturally and linguistically diverse (CALD) backgrounds are considered, including visa status, and cultural factors (i.e., language barriers, and limited access to extended support networks)
* consideration of barriers to help-seeking due to previous experiences of discrimination or non-inclusive services (for example, diverse cultural, linguistic and faith communities; people with a disability; people experiencing mental health issues; LGBTIQ people; women in or exiting prison or forensic institutions; people who work in the sex industry; people living in regional, remote and rural communities; male victim survivors; older people, Aboriginal people; children and young people.[[6]](#footnote-7))
* additional time may sometimes be required to undertake assessment, planning and referral
* not underestimating a person’s capacity to assess their own safety because they may have a disability or mental illness
* secondary consultation with relevant staff and/or external organisations when required, including with relevant cultural expertise, about individual cases or inclusive practice more generally
* use of interpreter services, including Auslan interpreters or communication aids, as and when required.

## Child and young person-centred practice

Family violence may have serious impacts on the current and future physical, spiritual, psychological, developmental and emotional safety and wellbeing of children and young people, who are directly or indirectly exposed to its effects[[7]](#footnote-8).

In practice this means:

* children and young people are recognised as victim survivors in their own right
* children and young people are able to receive an FSP response for their own needs, either as a part of a related adult victim survivor/s application, or within their own application
* individual risk assessments will be completed for all children and young people identified in the family where family violence risk is present
* agencies will acknowledge the unique experiences of children and young people, and their vulnerabilities and needs, including the effects of trauma and cumulative harm arising from family violence
* specific risks for children and young people will be considered when assessing the suitability of an FSP (and PSI) response for a family.

# Outcomes

Flexible Support Packages (FSPs) aim to deliver the following outcomes for victim survivors in a manner that is flexible enough to enhance risk management, safety planning and promote protective factors, needs, and priorities:

* safety and security,
* health and wellbeing,
* capabilities to participate; and
* connections to community and culture.

Use of FSPs must represent the most cost-effective, timely and appropriate response to meet the outcomes identified in a victim survivor’s case management/support plan.

# Eligibility and Suitability

## Eligibility

Flexible Support Packages (FSPs) are available for victim survivors who are attempting to transition out of crisis and establish long-term sustainable arrangements to improve their safety and wellbeing in recovery from family violence.

Victim survivors are eligible for FSPs if they meet all of the following eligibility criteria:

* have experienced family violence that has current or ongoing impact
* are planning to leave an abusive situation or have the perpetrator removed from the home
* are receiving support from a specialist family violence practitioner or other support service practitioner that is:
  + prescribed as Tier 1, 2 or 3 under [MARAM](https://www.vic.gov.au/sites/default/files/2019-04/Decision-guide-organisations-Maram-framework.pdf) requiring either Intermediate or Comprehensive risk assessment and risk management, and
  + able to provide continuous support, including ongoing risk assessment and risk management to the victim survivor until the FSP (and/or PSI) process is complete.
* have had an Intermediate or Comprehensive MARAM risk assessment and safety plan recently completed\*
* have a case management/support plan in place which identifies the way in which a flexible support package would support the victim survivor/s.

\*Recency in this context should be either a time period of two weeks or if a new incident of family violence has occurred, whichever is most recent.

FSPs will not be accessible to victim-survivors who wish to continue their domestic living arrangements with the perpetrator of the abuse, with the exception of victim-survivors living with adolescents who use violence (see section 5.3.2) and Aboriginal victim survivors (see section 5.3.3 Access to case management support should not be impacted by a victim-survivor returning to a domestic living situation with a perpetrator.

There are additional eligibility criteria for victim survivors wishing to apply for the Personal Safety Initiative. Please refer to the [PSI Operational Guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines) for further details on eligibility.

## 5.2. Suitability

Though a victim survivor may meet the eligibility criteria outlined above, this will not always mean that an FSP response is suitable for the victim survivor in their current circumstances, or that the resources and items requested within a FSP application are suitable.

To assess suitability of a response, FSP providers will need to consider (above and beyond eligibility criteria), the following:

* Any potential escalation of risk that a FSP provision might pose
* The relevance of the requested responses to a victim survivors case management/support plan
* The financial sustainability of an FSP response, i.e. a victim survivor can afford any ongoing costs without repeated FSP interventions
* The cost-effectiveness of items requested (e.g. a particular make and model of fridge could be replaced with a more affordable version).

The FSP provider will provide applicant agencies with a rationale if they have determined that a victim survivor does not meet the eligibility or suitability requirements for an FSP, or determine certain elements of a package request as an unsuitable response.

## 5.3. Target groups

In acknowledgement of diverse experiences of family violence, FSP applicant agencies and providers should consider each package based upon individual risk and circumstances for adult and child victim-survivors. Certain considerations for victim survivors with a disability, who are Aboriginal, from diverse communities or at-risk age groups should be taken into account and are outlined below.

### 5.3.1. Children and young people

FSPs should address the safety and needs of children and young people as victim survivors in their own right. Children and young people who have experienced family violence and are in need of access to support for their care, development and wellbeing are entitled and should be supported to apply for their own individualised packages linked to their own case management/support plan, or the case management/support plan of the adult victim survivors. Children and young people’s developmental stage, wishesand needs should be considered at all times. The child’s views should be sought, where age and developmentally safe, appropriate and reasonable.

Children and young people are also able to be supported through the FSP application for an adult victim survivor.

### 5.3.2. Adolescents using violence in the home

Whilst FSPs are not designed to provide supports for people who use violence, support can be purchased for adolescents using violence in the home for the purpose of enhancing the safety and wellbeing of victim survivors. It is acknowledged that while an adolescent is using violence in the home, they simultaneously require care and support from parents and/or caregivers. It is also acknowledged that most parents and/or caregivers are seeking to repair the relationship between themselves and the young person (which is often deliberately undermined by perpetrator behaviour) and are likely to need support to do so.

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| **Adolescents who use family violence as victim survivors**  Studies show us that adolescents who use violence in the home have often experienced or are experiencing family violence. Adolescents who use violence in the home and are also experiencing family violence in their own right are eligible for FSPs if they meet the general eligibility criteria outlined in these program guidelines. In addition to eligibility criteria, adolescents and their families should be linked into programs appropriate for the young person’s developmental age and stage and have appropriate risk management strategies in place to address their use of violence in the home. |

FSPs can be used to provide access to practical supports for adolescents using violence in the home which are focused on addressing their use violence through therapeutic and diversionary approaches.

Therapeutic approaches should be used to improve identification of individual risk factors, such as previous exposure to family violence, trauma, mental illness, disability and other factors that have been linked to this form of family violence. Diversionary approaches include promotion of community inclusion and re-engagement with education or employment options.

These supports should be linked to a victim survivors case management/support plan and be delivered as part of a broader package of supports provided for the victim survivor.

### 5.3.3. Aboriginal victim survivors

Delivery of FSPs for victim survivors from Aboriginal communities should be underpinned by the Dhelk Dja guiding principles of self-determination, collaboration and partnerships, strengths-based, cultural and trauma informed resilience and healing approaches, safety, accountability and transparency and honesty of all parties.

FSPs for Aboriginal victim survivors need to:

* consider the diversity of experience of Aboriginal individuals
* consider that a whole-of-family approach underpins Aboriginal communities and services and,
* provide choice to Aboriginal people to seek support through a dedicated Aboriginal Community Controlled Organisation (ACCO) or a mainstream service.

Where FSPs are required for Aboriginal victim survivors who are currently residing with the perpetrator in recognition of the whole-of-family service approach, the applicant agency and FSP provider need to consider and account for:

* the perpetrators pattern of coercive control behaviours, including history of emotional and financial abuse
* the likelihood the perpetrator will misuse or misappropriate funds and/or supports provided:
  + to perpetrate further abuse - e.g., taking supports for their own (perpetrators)
  + for their own financial/personal gain (e.g., selling items and retaining funds)
* the likelihood the victim survivors has been or is likely to be coerced to complete FSP applications for a perpetrator’s benefit
* the types of supports being requested through the FSP and the increased capacity to misappropriate some types of supports (for example, in some circumstances vouchers and whitegoods may not be appropriate)
* provision of ongoing risk assessment and risk management to ensure the FSP response does not increase risk to the victim survivors.

FSP applications for Aboriginal victim survivors should be submitted to an ACCO FSP provider for a culturally safe assessment of the package, unless there is an expressed preference of the victim survivor to be referred to a mainstream FSP provider. For victim survivors who choose to remain with a mainstream service, providers are recommended to conduct a secondary consultation with one of the divisional ACCO FSP providers. Note, confidential client information should not be shared during secondary consultations unless consent has been provided.

### 5.3.4. Victim survivors with a disability

Victim survivors’ personal experiences of disability are diverse and so are their support needs. Delivery of FSPs for victim survivors with a disability should be underpinned by an understanding of, and tailored to the unique family violence risks victim survivors with a disability responding to their unique experiences, circumstances and needs. Prior to applying for an FSP, applicants should also consider if the victim survivor is able to instead access supports under the NDIS, and whether these can be provided in a timely manner.

FSP applications should be flexible, recognising that victim survivors with a disability will have complex and intersecting support needs which will likely raise the package value. In instances where more than the maximum package amount is required to support an individual with a disability, the FSP provider should contact FSV (via [programservicedevelopment@familysafety.vic.gov.au](mailto:programservicedevelopment@familysafety.vic.gov.au)) with an overview of the application prior to approval.

### 5.3.5. Victim survivors on temporary visas

Victim survivors on temporary visas often experience significant barriers in accessing support due to the nature of their residency status. Victim survivors on temporary visas are often ineligible for many government support payments, leaving victim survivors financially dependent on the perpetrator/s and/or with no income. Where appropriate, FSPs should be prioritised to provide support for victim survivors on temporary visas, with a view for victim survivors gaining access to a stable income. This may include paying for supports required to establish permanent residency. It is likely victim survivors on temporary visas will need more than one FSP while they are supported through visa process.

# What Flexible Support Packages can support

Flexible Support Packages (FSP) can be used to purchase services and goods nominated by victim survivors in their case management/support plan. The average cost of a package is $3,400 based on current service delivery trends.

Application for FSPs can be used where other accessible avenues for support (for example, local, state or Commonwealth Government services) cannot be provided in a timely manner.

Examples of goods and services that may be purchased under FSPs include, but are not limited to, items that support risk management and promote protective factors, such as:

* **Freedom from abuse and violence** (**safety and security measures)**- basic security responses including lock changes, installation of security doors, repairs to broken doors and windows, sensor lighting, landscaping; and/or technological responses under the Personal Safety Initiative (PSI) such as safety and security audits, the installation of a home alarm system, CCTV, or a Personal Safety Device (PSD).
* **Support for physical and mental health and wellbeing** – medical or pharmaceutical costs not covered by Medicare or Pharmaceutical Benefits Scheme, disability aids and equipment and basic material needs including food, clothing and care packs.
* **Therapeutic interventions**- family violence counselling, Alcohol and Other Drugs counselling and other forms of therapy.
* **Suitable and stable housing** – public or private housing debt, mortgage costs, rent in advance, rent arrears, relocation costs, travel costs, furnishings and whitegoods in newly established housing
* **Participation in learning and education** – school and educational costs, support for travel, kinder/childcare costs and books, equipment and material aids.
* **Workforce participation**- clothing, uniform, tools and equipment and training costs.
* **Financial security and independence** – basic material needs, payment of bills (utilities, phone) and debts, financial counselling, and financial services.
* **Legal and court costs**-general legal advice, migration specific services, assistance with family violence intervention orders, police checks and other legal or court services.
* **Support for social engagement and connection with culture and identity** – public transport, vehicle purchase and repairs, driving lessons and participation in social, cultural and sporting activities.

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| **Basic security responses and the Personal Safety Initiative (PSI)**  The PSI is not intended to be a crisis response. Typically, it may take several weeks from identification of the need for a PSI response to seek appropriate approvals, undertake an audit and implement recommended safety and security responses.  To ensure a timely response to any immediate risks to safety, a small number of basic safety and security responses can be implemented outside the scope of a PSI response and do not require a safety and security audit. These include repairs to broken doors and/or windows, lock changes and installation of security doors.  Requests for repairs, lock changes and security doors can be applied for separately to this PSI process where alternative funding sources are not available. This does not preclude repairs, lock changes and security doors being recommended in a safety and security audit and implemented as part of a broader PSI response.  Where a victim survivor living in a community or public housing property requires an immediate safety and security response, an urgent maintenance request should be made to the relevant housing agency, Housing Call Centre or local DHHS Housing office. |

## 6.1. Exclusions and additional requirements

Flexible support packages cannot be used for the following purposes:

* to provide supports for perpetrators
* to fund or support illegal activity\*
* gambling
* products or services not identified in the victim survivors case management/support plan
* to replace or duplicate supports that are available through other funding sources, including other Local, State and Commonwealth Government programs, where these can be accessed in a timely manner
* cash payments

\*Note, this does not include ramifications from crimes committed by the perpetrator to harm the victim survivor, e.g., property damage.

# Application process

## 7.1. Prior to application

Prior to applying for an FSP, applicant agencies should:

1. Have undertaken all relevant risk assessment, risk management, and safety planning procedures with victim survivor(s) using the MARAM Framework and continue these in an ongoing way for the duration of the FSP application process. This includes completion of a MARAM risk assessment\* and safety plan\*.
2. Have created a case management/support plan\* with the victim survivor which identifies areas where a FSP response would support the victim survivor to reduce family violence risk and establish sustainable arrangements that support their long-term health, wellbeing and financial stability and independence.
3. Ensure the victim survivor is eligible and suitable for an FSP (and PSI if relevant) response; this may entail completing a secondary consult with the relevant FSP and/or PSI provider if unsure.
4. Obtain informed consent\* from the victim survivor for an FSP/PSI (**see section 7.1.1**). If a child victim survivor is applying in their own right, informed consent from a safe parent or guardian should be sought where relevant.
5. Have explored supports available through other funding sources, including other Local, State and Commonwealth Government programs (which could be provided in a timely manner) that replace or duplicate supports to be requested in the FSP application. Determine, along with the victim survivor, which FSP provider is the most appropriate to apply to **(see section 7.2)**

\*Note, copies of risk assessments, safety plans, case management/support plans and signed informed consent forms generally do not need to be provided. Applicants will need to declare these have been completed in the FSP application. FSP providers may request these documents from time to time where additional information is required for assessment of a package.

### 7.1.1. Information sharing and consent

Upon collection of information from the victim survivor, case managers should ensure the victim survivor has provided informed consent for:

* Their information to be collected and shared on the FSP portal for the purposes of assessing their FSP application
* Sharing their information with third party agencies for the purposes of assessing their FSP application and liaising with external providers for delivery and payment of approved items
* The limited access to their information by third party service providers that manage the platform the FSP Portal is hosted on, for administrative and technical support
* FSV and DFFH to collect information from the FSP Portal to understand how the platform and related programs are being administered to improve services, which will be on a de-identified basis where possible.

Guidance on collection notices and consent forms can be found in **Appendix 2**.

FSPs applied for and provided for child victim survivors should have adult/non-violent parent’s views and the child’s views should be sought, where age and developmentally safe, appropriate and reasonable.

Additional information applies for a PSI response (see section 4.4 of the [PSI operational guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines)).

A victim survivor who is eligible and suitable for a FSP response must be provided the opportunity to direct and confirm the intervention proposed for all components of the response. Case managers need to provide victim survivors with all relevant information to enable to victim survivor to provide their views and endorsement for the FSP application.

The case manager must ensure the victim survivor understands the potential impacts and outcomes of a FSP response. These include:

* the application for the FSP might not be approved or only partially approved dependant on eligibility and suitability of the FSP application;
* and any specific items requested (e.g. a particular brand and make of fridge) may be substituted by a more affordable version.

Any rationale behind these decisions should be communicated from the FSP provider to the applicant agency.

## 7.2. Choosing the FSP provider

Applicant agencies will need to determine, along with the victim survivor, which FSP provider is the most relevant to make their application. This decision might be based on the following:

* The local area of the victim survivor (and/or the area where the victim survivor is relocating to, within Victoria)
* The preference of the victim survivor for particular community support
  + For example, there are divisional Aboriginal Community Controlled Organisations which a victim survivor (adult or child) who identifies as Aboriginal may wish to apply to.
  + Additionally, there are FSP providers within targeted services that provide support for victim-survivors from specific communities, such as multicultural communities or ethno-specific groups and LGBTIQ communities.





## 7.3. Misidentification and information sharing

There may be times when an FSP provider will receive an application where the provider believes the victim survivor or perpetrator in the application has been misidentified[[8]](#footnote-9).

This may be due to:

* A cross-application[[9]](#footnote-10), and/or
* The professional judgement of the FSP provider as a Specialist Family Violence Sector professional.

If this occurs, FSP providers should share relevant risk information, including via the Information Sharing Schemes, as authorised, with applicant agencies for their risk assessment purposes (e.g. to correctly identify the parties).

The responsibility to manage the process to determine the predominant aggressor between the two parties is then the responsibility of the applicant agency/ies, not the FSP provider themselves.[[10]](#footnote-11)

# 8. Service requirements, roles and responsibilities

## 8.1. Package amount

The maximum amount an adult/child victim survivor or family unit can receive in one support period[[11]](#footnote-12) from Flexible Support Package (FSP) is expected to be no more than $10,000. Note, the average package amount is typically $3,400. In circumstances where an individual or family re-presents after a support period has been closed this will be considered a new support period and a new package can be provided based on risk and need.

In cases where more than $10,000 has been assessed by an FSP provider as required for an adult/child victim survivor or for a family unit within the same support period, the FSP provider should contact FSV (via [programservicedevelopment@familysafety.vic.gov.au](mailto:programservicedevelopment@familysafety.vic.gov.au)) with an overview of the application and rationale before approving. Any confidential information and/or identifying details should be removed.

**8.1.1 Applying for additional supports in the same support period**

Where additional support needs have been identified after an FSP package has already been approved in the same support period, the application must include an updated case management/support plan and risk assessment. The rationale for additional supports must clearly demonstrate the change in risk or need that necessitates a request for additional FSP funding.. Note these requirements do not apply to the usual PSI process, from audit to installation, as the security recommendations from safety and security audits are not additional support needs.

The FSP provider must be satisfied that:

• the funding sought meets the criteria and principles set out in the FSP program guidelines

• the arrangement is sustainable in addressing the client’s long-term recovery and support needs and achievement of their goals

• alternative forms of financial support have been explored / exhausted.

Supports should still not exceed the $10,000 total support requested within the one support period. If this occurs, FSV should be contacted (via [programservicedevelopment@familysafety.vic.gov.au](mailto:programservicedevelopment@familysafety.vic.gov.au)) as per the above.

## 8.2. Demand management and prioritisation

FSP providers will be required to put in place demand and prioritisation measures to ensure equity of access to FSP for the duration of the funding period.

Priority for access to FSPs should be given to:

* Adult and child victim survivors at highest risk from family violence
* victim survivors experiencing significant financial hardship
* victim survivors who are unlikely/unable to access other forms of brokerage and financial supports in a timely manner

FSP providers should avoid capping of packages at fixed amounts, keeping in mind that primary objective of FSPs is to provide tailored support to individuals based on their support needs.

## 8.3. Roles and responsibilities

The following provides a description of the roles and responsibilities of key stakeholders in the delivery of FSPs.

### 8.3.1. Applicant agency and case manager

The key responsibilities of case managers applying for a Flexible Support Package are to:

* Complete the application process in line with section 3 of this document
* Complete MARAM responsibilities as a prescribed organisation, including;
  + Providing ongoing risk assessment and risk management, including a safety plan
  + Complete information sharing processes for the purposes of risk assessment and risk management, where legally applicable
  + Applicants from non-specialist family violence services should also consider seeking secondary consultation with their local SFVS, and/or complete referrals to the SFVS service
  + Ensure practice limits the possibility of misidentification[[12]](#footnote-13), to ensure the applicant is the victim survivor, rather than the perpetrator of family violence
* Provide ongoing support for the adult and child victim survivor/s, in line with MARAM requirements, until the FSP process is complete.

If a victim survivor is also seeking a PSI response, the case manager holds additional responsibility (see section 5.1 of the [PSI operational guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines))

**8.3.2 Family Violence Flexible Support Package (FSP) providers**

The key responsibilities of FSP providers are to:

* Provide recommendations to case managers about the appropriateness of an FSP for individual cases.
* Assess the eligibility and suitability of FSP applications in accordance with the FSP program guidelines, requesting further information from the applicant where needed.
* Support applicant agencies in completing applications via the FSP portal. This does not include technical support.
* Ensure that any safety and security measures requested (beyond basic security responses) have been received alongside a recommendation from the PSI coordinator, as per the [PSI operational guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines).
* Approve FSP applications and administer FSP funds in accordance with the FSP program guidelines.
* Manage demand and prioritisation of FSP funds for eligible victim survivors.
* Ensure reporting compliance to the Department.
* Provide feedback to the Statewide FSP coordinator and Family Safety Victoria about the FSP program.
* Participate in the FSP Community of Practice, facilitated by the Statewide FSP Coordinator and Family Safety Victoria.

FSP providers hold additional responsibility in relation to PSI applications (see section 5.5 of the [PSI operational guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines)).

## 8.3.3. Local PSI coordinator

Within the context of FSP applications, the key responsibilities of local PSI Coordinators are to:

* Provide secondary consultations about the role and suitability of PSI responses in addressing safety and security goals and sustainably assisting in managing family violence related risk.
* Provide recommendations to case managers and FSP providers about the appropriateness of PSI responses for individual cases (including where further leasing and/or external monitoring is identified as being required by a case manager following a three-month review of an existing PSI response).
* Review completed safety and security audits with case managers and provide recommendations to FSP providers for approval of required funds to implement audit recommendations.

Note: the local PSI coordinator holds further responsibilities specifically relevant to the PSI program, as outlined in the [PSI operational guidelines](https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines).

### 8.3.4 Statewide FSP Coordinator

The key responsibilities of the Statewide FSP Coordinator are to:

* Provide leadership and support to FSP provider agencies, including through facilitation of a Community of Practice.
* Develop and foster sound working relationships with PSI coordinators and FSP providers to promote and strengthen the initiative.
* Maintain an up-to-date contact list of all FSP and PSI agencies.
* Provide strategic advice and guidance to support the operation of the FSP statewide in accordance with these guidelines.
* Advocate on behalf of FSP providers to the Department, inclusive of feedback from FSP providers.

# 9. Reporting and Accountability

## 9.1. Compliments and complaints

### 9.1.1. Organisation requirements

It is important that all compliments and complaints are managed in line with the department’s guiding principles of visibility and accessibility, responsiveness, assessment and investigation, feedback, improvement focussed and service excellence.

Compliments and complaints related to funded organisation services should be handled by the funded organisation in the first instance. Funded organisations must have an accessible, responsive and transparent compliments, complaints and feedback framework to ensure continuous improvement.

Investigation and resolution of complaints or disagreements about an FSP decision will be managed in line with the FSP provider’s compliments and complaints policy. Depending on the nature of the complaint or disagreement, it is expected that a review will be conducted and that the outcome of the review will be communicated to the relevant party in writing.

Complaints can be raised by applicant workers on behalf of victim survivors via the FSP Portal appeal request process.

### 9.1.2. Further information

The department’s ‘[Compliment and complaint management policy](https://fac.dhhs.vic.gov.au/compliment-and-complaint-management-policy)’ outlines the requirements of funded organisations in relation to the management of compliments and complaints.

The department’s Complaints Unit provides support and assistance in the management and development of complaints policies, guidelines and processes.

The Complaints Unit provides a complaints line for departmental staff, clients and members of the public to register their feedback and complaints.

Complaints line: 1300 884 706  
Email: Feedback@dhhs.vic.gov.au  
Complaints Unit  
GPO Box 4057  
Melbourne VIC 3000

The department's website includes a guide to [Making a complaint to the Department of Families, Fairness and Housing](https://dhhs.vic.gov.au/making-complaint).

## 9.2. Governance

The following governance mechanisms are in place to support delivery of the FSP program across the State:

Family Safety Victoria provides program management oversight and strategic and operational policy development for the FSP program, including the development and revision of these program guidelines.

Service agreement management is the responsibility of Department of Families Fairness and Housing’s Agency Performance and System Support teams in each local area.

Family Safety Victoria and Domestic Violence Victoria will convene regular meetings with all agencies that are funded to administer FSPs and deliver a PSI Coordinator function.

Agencies and organisations are accountable to the Department of Families Fairness and Housing and Family Safety Victoria through their respective service agreements.

Governance will be complemented by existing sector partnerships and Family Violence Regional Integration Committees, which provide regional leadership to improve integration of family violence services and coordination with other key services.

## 9.3. Acquittals/accruals

Service providers are required to acquit Flexible Support Package (FSP) funding to the department on a quarterly basis. FSP providers can produce acquittal reports via the FSP Portal, review for accuracy and download for submission to the department.

These acquittal/accrual reports are required to indicate all approved package funding, not only finalised invoices. If for any reason approved invoices are not paid, amounts are to be amended in the next reporting period. Service providers are not required to report administrative costs. The accrual report includes:

* total amount of funds allocated for that financial year to the service provider
* the final value of funds expended and approved for each package (recipient de-identified)
* type and amount of assistance provided to each package recipient via drop down box menu
* the balance of unspent funds/unallocated funds

Each provider is expected to deliver the number of packages/cases specified in the Department of Families Fairness and Housing Services Agreement.

Service providers are expected to fully allocate flexible support package funding over the relevant financial year. The treatment of any unspent funds will be negotiated with the department, depending on the amount and reasons. The department reserves the right to require service providers to repay the unspent funds to the department.

Service providers are also required to monitor and acquit expenditure against case management/support plan goals and rationale for requested supports, as provided in FSP application. A key purpose of such funding acquittal is to ascertain that funds provided have been fully expended or committed in accordance with the agreed funding plan. The department may undertake a forensic audit of the program to ensure funds are acquitted as per these program guidelines.

# Appendix 1: Terminology

**Family violence**

Family violence is defined under Section 5 of the *Family Violence Protection Act 2008* (the Act) as:

1. Behaviour by a person towards a family member of that person if that behaviour:
2. is physically or sexually abusive; or
3. is emotionally or psychologically abusive; or
4. is economically abusive; or
5. is threatening; or
6. is coercive; or
7. in any other way controls or dominates the family member and causes that family member to feel fear for the safety and wellbeing or that family member or another person; or
8. Behaviour by a person that causes a child to hear or witness, or otherwise be exposed to the effects of, behaviour referred to above[[13]](#footnote-14).

See also ‘Aboriginal definition of family violence’.

**Aboriginal definition of family violence**

As included in *Dhelk Dja: Safe Our Way – Strong Culture, Strong Peoples, Strong Families,* the Victorian Indigenous Family Violence Task Force defined family violence against Aboriginal people as “an issue focused around a wide range of physical, emotional, sexual, social, spiritual, cultural, psychological and economic abuses that occur within families, intimate relationships, extended families, kinship networks and communities. It extends to one on-one fighting, abuse of Indigenous community workers as well as self-harm, injury and suicide”.[[14]](#footnote-15)

This definition acknowledges the spiritual and cultural perpetration of family violence by non-Aboriginal people against Aboriginal partners, children, young people and extended family members, abuse of Elders, and lateral violence within Aboriginal communities.[[15]](#footnote-16)

**Family member**

As defined under Section 8 of the Act, the meaning of family member is broad and includes a range of relationship types that are not limited to being of an intimate or biological nature[[16]](#footnote-17).

Family member includes a person who ‘under Aboriginal or Torres Strait Islander tradition or contemporary social practice, is the person’s relative’[[17]](#footnote-18).

**Intersectionality (intersectional feminism)**

A theory developed to examine how multiple forms of power, privilege and oppression overlap, or intersect, in people’s lives in mutually reinforcing ways to produce power hierarchies, structural inequalities and systemic marginalisation.[[18]](#footnote-19)

**Cultural safety**

To practice in a culturally safe way means to carry out practice in collaboration with the service user, with care and insight for their culture, while being mindful of one’s own. A culturally safe environment is one where people feel safe and where there is no challenge or need for the denial of their identity.[[19]](#footnote-20)

**Accessibility, inclusion and equity**

Accessibility is a broad umbrella term to describe all aspects that influence a person’s ability to function within an environment or participate in an activity. Inclusion refers to processes that enable involvement and empowerment of all people, where their inherent worth and dignity is recognised, and barriers and inequalities are continuously reviewed and addressed. Equity is a human rights and social justice concept whereby all people across society are able to fairly participate, prosper and reach their full potential, regardless of their background or identities.

**Perpetrator**

Has the same meaning as the words “a person of concern” in s 144B of the FVPA. The FVPA provides an individual is a person of concern if an information sharing entity reasonably believes that there is a risk that they may commit family violence.[[20]](#footnote-21)

**Adolescents who use family violence**

For adolescents, the term ‘adolescent who uses family violence’ is used. This reflects that this is a form of family violence requiring distinct responses, given the age of the young person and their concurrent safety and developmental needs, as well as common co-occurrence of past or current experience of family violence by the adolescent from other family members[[21]](#footnote-22).

**Victim survivor**

Has the same meaning as the words “a primary person” (adult or child) in the FVPA. The FVPA provides a person is a primary person if an information sharing entity reasonably believes there is risk that the person may be subjected to family violence.[[22]](#footnote-23)

This term acknowledges that the person subjected to family violence is both a victim of a crime and a human rights violation, and they are also a survivor with respect to their autonomy, strength and resilience. The term must not be used to wholly define a person.[[23]](#footnote-24)

Family Safety Victoria recognises the gendered nature of family violence, consistent with the Royal Commission into Family Violence which noted that ‘the significant majority of perpetrators are men and the significant majority of victim survivors are women and their children’. Women and children and young people are therefore likely to be the primary recipients of FSPs.

In recognition of the diverse experiences of family violence experienced by Aboriginal people, people from culturally and linguistically diverse backgrounds, people with disabilities, people from the lesbian, gay, bisexual, trans, gender diverse and intersex community and older people experiencing elder abuse, victim survivors will be the exclusive term used throughout this document.

Different parts of the service system may use specific terms, such as applicant or Affected Family Member (AFM) as an alternative to victim survivor.

**Applicant agency/agencies**

This describes the agencies and organisations that are able to apply for a Flexible Support Package on behalf of the victim-survivor. The applicant agency must be able to provide a case management function, further defined and described below.

**Case management**

Within the Specialist Family Violence Sector (SFVS), case management includes a range of practices including screening and intake, risk assessment, risk management, safety planning, crisis responses, outreach, advocacy, psycho-social needs assessment, goal setting, coordination of services, referrals, exit planning and case closure. Case management is holistic, culturally sensitive, person-centred and strengths-based. Interventions may vary in intensity and duration depending on the risks and needs of adult and child victim-survivors.[[24]](#footnote-25)

To access an FSP, victim-survivors will need to be engaged with an organisation that can provide a case management function. While this does not have to be a SFVS organisation, they must fit the following criteria of case management:

* Be an organisation/agency that is prescribed as Tier 1, 2 or 3 under MARAM. The practitioner providing support to the victim survivor must also be in a role which requires Tier 1, 2 or 3 understanding, requiring either Intermediate or Comprehensive risk assessment and risk management.
* Be able to provide continuous support, including ongoing risk assessment and risk management to the victim-survivor until the FSP (and/or PSI) process is complete.
* Be able to provide a case management plan to victim survivors, inclusive of any relevant children.

**Case management/support plan**

Case management plans are sometimes referred to as case plans, support plans and/or goal-directed plans. A case management plan is a holistic person-centred plan that is led, as far as possible, by the victim survivor and reflects their goals and expected outcomes. Any case management plan submitted as part of an FSP application should clearly articulate how the FSP will assist in achieving these outcomes.

A case management plan is often part of an ongoing risk management response.

Note: The Responding to Family Violence Capability Framework states Tiers 2 and 3 should indicate this skill under Capability Four: *Develops, implements and modifies case management plans that are inclusive of family violence responses[[25]](#footnote-26),* with Tier 1 additionally responsible to include *sexual assault responses*[[26]](#footnote-27).

**Cross-application**

When FSP providers receive separate FSP applications (usually from different FSP applicant agencies) with conflicting parties – ie. in one application the victim survivor has been misidentified[[27]](#footnote-28) as a perpetrator (and vice versa). These applications may have been received at the same time, or at separate dates.

**Definition of a package/case**

Each provider is expected to deliver the number of packages specified in the Department of Health and Human Services Agreement. A case is defined as a necessary period of support where a case management plan is in place and a package has been allocated.

In circumstances where a victim-survivor and their children re-presents after a support period has been closed and a new case management plan is put in place, this will be considered to be a new case. In order to assess whether this has occurred, service providers are required to collect data on a range of outcome indicators and analyse their performance against these indicators in order to identify areas in which further improvement may be required.

**Family violence intervention order (FVIO)**

A family violence intervention order is a court order to protect a person (and children) from a family member or partner who is using family violence.

**FSP portal**

The FSP portal is an online area where applicant agencies submit FSP applications, and which provider agencies utilise to assess, respond to and report on applications made to their agency. All FSP applications should be applied for via the FSP portal.

**Support period**

A support period is defined as an episode of support provided to an adult or child victim survivor by the applicant agency (i.e. from screening and assessment through to service delivery).

In circumstances where a victim survivor re-presents to the applicant agency after a support period has been closed and a new case management/support plan is put in place, this will be considered to be a new support period.

**Risk assessment**

The process of applying the model of Structured Professional Judgement (SPJ), as per the MARAM Framework, to determine the level of family violence risk.[[28]](#footnote-29)

SPJ is informed by:

* Victim survivor self-assessment;
* evidence-based risk factors;
* information sharing; and
* intersectional analysis.[[29]](#footnote-30)

**Ongoing risk assessment**

Risk is also dynamic and can rapidly change, resulting in changes to the level of risk. A key to understanding seriousness of risk is to understand how risk escalates or changes in severity or frequency over time. It is therefore important to regularly revisit risk questions with an individual.

Understanding a victim survivor’s risk over time involves undertaking risk assessment at a ‘point in time’ and comparing with previous risk assessments/information. This process of conducting point in time assessment and review of previous assessments is referred to as ‘ongoing assessment’.[[30]](#footnote-31)

**Risk management**

Risk management is a coordinated set of strategies and actions aimed at enhancing the safety of the victim survivor (adult, child or young person) and reducing or removing the likelihood that the perpetrator will commit further violence.

All risk management must involve safety planning. In addition to safety planning, other forms of risk management may also be required such as discussing options with victim survivors, connection to support and services, secondary consultation, and ongoing risk assessment.[[31]](#footnote-32)

**Safety**

Safety can be understood as a state in which a person experiencing family violence is no longer facing a danger, threat or risk of harm from the perpetrator.[[32]](#footnote-33)

**Safety planning**

Safety planning typically involves a plan developed by a practitioner with the victim survivor to manage their own safety in the short-medium term, building on what the victim survivor is already doing and what works for their circumstances. Safety planning will include strategies the victim survivor is already using to resist control, manage the perpetrator, and keep them safe.[[33]](#footnote-34)

**Secondary consultation**

A process whereby a practitioner either seeks advice or provides advice to another service/practitioner for a range of reasons including:

* assessing and analysing family violence risk;
* developing a risk management plan;
* determining information about a perpetrator;
* understanding the needs and circumstances for people from diverse communities and age groups;
* providing responses to address the specific safety and wellbeing needs of infants, children and young people; and
* determining if a referral is appropriate.

Secondary consultation to seek guidance on possible next steps can occur without any identifying information being provided about the victim survivor. Specialist family violence services have secondary consultation responsibilities under the MARAM Framework.[[34]](#footnote-35)

**MARAM framework**

The Family Violence Multi-Agency Risk Assessment and Management Framework.[[35]](#footnote-36)

**Misidentification**

Where a victim of family violence is named or categorised as a perpetrator (or respondent in criminal proceedings) for their use of self-defence or violent resistance, or as a form of defence of another family member, or where they are identified based on a misinterpretation of their presentation due to the impact of violence, mental health issues, influence of alcohol or other drugs, aggression toward policy or initiation of police contact.[[36]](#footnote-37)

Perpetrators might be misidentified as victim survivors.[[37]](#footnote-38)

**Perpetrator accountability**

The process by which the perpetrator themselves acknowledges and takes responsibility for their choices to use family violence and work to change their behaviour.

It sits with all practitioners, organisations and systems through their collective, consistent response to promote perpetrators’ capacity to take responsibility for their actions and impacts, through formal or informal services response mechanisms.[[38]](#footnote-39)

**Personal Safety Initiative (PSI)**

PSI responses are funded via FSPs. The PSI is a non-crisis response that provides eligible victim-survivors with safety and security audits and access to property modifications and personal safety technology (e.g. personal safety devices) which meet minimum technology standards.

Victim survivors that wish to have a PSI response will need to fit the eligibility criteria of the PSI. Please refer to the Personal Safety Initiative operational guidelines for further detail: <https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines>

**Protective factors**

Protective factors may mitigate or lessen risk. They can also build resilience and support recovery where family violence has occurred. The ‘protectiveness’ of any protective factor is only useful to the degree a perpetrator is willing or unwilling to undermine or ignore that factor.[[39]](#footnote-40)

**Provider agency/agencies**

This describes the agencies and organisations that hold Flexible Support Package funding, receive FSP applications and assess the eligibility and suitability of these. There may be times where a provider agency is also an applicant agency.

# Appendix 2: Guidance on privacy collection notices and consent forms for the Family Violence Flexible Support Package (FSP) online portal

The information below provides general guidance to applicant organisations on wording that can be included in privacy collection notices and consent forms which relate to their use of the FSP online portal. This wording is intended to assist applicant organisations in discharging their obligations under the *Privacy and Data Protection Act 2014* (PDPA) and the *Health Records Act 2001* (HRA) to notify individuals about the purposes for which their personal information is being collected, and how their personal information may be shared with third parties.

The information contained in this document is not intended to be legal advice from Family Safety Victoria (FSV) and its purpose is to provide a suggested format for applicant organisations’ to appropriately notify individuals to satisfy obligations under Victorian privacy law. FSV takes no responsibility for applicant organisations’ reliance and use of the information contained in this document.

* + - 1. **Why do we collect and use your information?**

The Family Violence Flexible Support Package program and related online database (FSP Portal) has been implemented by Family Safety Victoria (FSV), a Victorian Government administrative office, to help agencies apply for, assess and administer Flexible Support Packages on behalf of victim survivors.

**2. How do we collect and use your information?**

Your information is collected by [applicant organisation] and stored on the FSP Portal.  The FSP Portal is hosted by a service provider to FSV, ‘Our Community’ via a platform called ‘Smarty Grants’.

In general, only authorised personnel from [applicant organisation] and agencies responsible for assessing applications and administering Flexible Support Packages will be able to collect and access your personal information through the FSP Portal. Authorised personnel from FSV and technical support staff from Smarty Grants will have limited access to the FSP Portal for the purpose of maintaining and improving the system. These staff are not permitted to use the information for unrelated purposes, or to share the information with any third parties.

FSV and the Department of Families, Fairness and Housing will collect information from the FSP Portal to understand how the platform and related programs are being administered across the State and to improve services. Where possible, de-identified information will be used for these purposes that does not identify you.

[applicant organisation] may share your information with third party agencies for the purposes of assessing your Flexible Support Package application, liaising with external providers for delivery and payment of approved items.

**3. What happens to your personal information?**

Your personal information will be handled in accordance with the requirements of the *Privacy & Data Protection Act 2014 (Vic)* together with the [FSV Privacy Policy](https://www.vic.gov.au/family-safety-victoria-privacy-policy)

**4. Who to contact in relation to the FSP Portal?**

[applicant organisation] is responsible for the accuracy and relevance of the data inputted into the FSP Portal. Please contact [applicant organisation] if your circumstances change and your information requires updating or amending.

If you would like further information as to how your personal information is stored or handled, including access to your information, please contact FSV on [privacy@familysafety.vic.gov.au](mailto:privacy@familysafety.vic.gov.au) .

1. The *Code of Practice* articulates a set of principles and standards to guide consistent quality service provision for victim-survivors accessing specialist family violence services. [↑](#footnote-ref-2)
2. State of Victoria, MARAM Practice Guides: Foundation Knowledge, 2019, p. 20 [↑](#footnote-ref-3)
3. Domestic Violence Victoria, Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors. 2nd Edition, 2020, p. 38. [↑](#footnote-ref-4)
4. See the definition of risk assessment (inclusive of Structured Professional Judgment) in this document under ‘Terminology’. [↑](#footnote-ref-5)
5. See also Family Safety Victoria, (2018), Everybody Matters: Inclusion and Equity Statement. Melbourne, State of Victoria [↑](#footnote-ref-6)
6. State of Victoria, Family Violence Multi Agency Risk Assessment and Management Framework: Practice Guides, 2020, p. 12 [↑](#footnote-ref-7)
7. MARAM Framework, 2018, p. 11 [↑](#footnote-ref-8)
8. See the definition of *misidentification* in this document under ‘Terminology’. [↑](#footnote-ref-9)
9. See the definition of *cross-application* in this document under ‘Terminology’. [↑](#footnote-ref-10)
10. Please see [Family Violence Information Sharing Guidelines: Guidance for Information Sharing Entities](https://www.vic.gov.au/family-violence-information-sharing-scheme). 2017, p. 49. [↑](#footnote-ref-11)
11. See the definition of *support period* in this document under ‘Terminology’. [↑](#footnote-ref-12)
12. See definition of *misidentification* in these FSP program guidelines. [↑](#footnote-ref-13)
13. Family Violence Protection Act 2008 (Vic), s 5. [↑](#footnote-ref-14)
14. Department of Health and Human Services, Dhelk Dja: Safe Our Way – Strong Culture, Strong Peoples, Strong Families (the Aboriginal 10 Year Family Violence Agreement 2018-2028), 2018, p. 7. [↑](#footnote-ref-15)
15. Domestic Violence Victoria, Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors. 2nd Edition, 2020, p. 72. [↑](#footnote-ref-16)
16. Family Violence Protection Act 2008 (Vic), s 8. [↑](#footnote-ref-17)
17. Ibid., s 10. [↑](#footnote-ref-18)
18. Crenshaw, K, Demarginalizing the intersection of race and sex: A Black feminist critique of antidiscrimination doctrine, feminist theory and antiracist politics. University of Chicago Legal Forum, 1989 (1), Article 8, 139-168. [↑](#footnote-ref-19)
19. State of Victoria, MARAM Practice Guides: Foundation Knowledge Guide, 2019, p. 63. [↑](#footnote-ref-20)
20. State of Victoria, Family Violence Multi Agency Risk Assessment and Management Framework Practice Guides, 2020, p. 66. [↑](#footnote-ref-21)
21. State of Victoria, Family Violence Multi-Agency Risk Assessment and Management Framework, 2018, p. 9. [↑](#footnote-ref-22)
22. State of Victoria, Family Violence Multi Agency Risk Assessment and Management Framework Practice Guides, 2020, p. 68. [↑](#footnote-ref-23)
23. Domestic Violence Victoria, Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors. 2nd Edition, 2020, p. 85. [↑](#footnote-ref-24)
24. Domestic Violence Victoria, Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors. 2nd Edition, 2020, p. 73. [↑](#footnote-ref-25)
25. State of Victoria, Responding to Family Violence Capability Framework, 2017, p. 24. [↑](#footnote-ref-26)
26. Ibid. p. 40. [↑](#footnote-ref-27)
27. See the definition of *misidentification* in this document under ‘Terminology’. [↑](#footnote-ref-28)
28. State of Victoria, MARAM Practice Guides: Foundation Knowledge Guide, 2019, p. 67. [↑](#footnote-ref-29)
29. State of Victoria, MARAM Practice Guides: Foundation Knowledge Guide, 2019, p. 29. [↑](#footnote-ref-30)
30. State of Victoria, Family Violence MARAM Framework: Practice Guides (Responsibility Three), 2019, p. 133. [↑](#footnote-ref-31)
31. State of Victoria, Family Violence MARAM Framework: Practice Guides (Responsibility Four), 2019, p. 224. [↑](#footnote-ref-32)
32. Domestic Violence Service Management (2018). Project Report: Concepts of Safety. Sydney, NSW: Sightlines Professional Services Division. [↑](#footnote-ref-33)
33. State of Victoria, MARAM Practice Guides: Foundation Knowledge Guide, 2019, p. 36. [↑](#footnote-ref-34)
34. Domestic Violence Victoria, Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors. 2nd Edition, 2020, p. 84. [↑](#footnote-ref-35)
35. State of Victoria, MARAM Practice Guides: Foundation Knowledge Guide, 2019, p. 64. [↑](#footnote-ref-36)
36. Ibid. [↑](#footnote-ref-37)
37. Ibid. p. 61. [↑](#footnote-ref-38)
38. Ibid. p. 65. [↑](#footnote-ref-39)
39. State of Victoria, Family Violence Multi Agency Risk Assessment and Management Framework Practice Guides, 2020, p. 143. [↑](#footnote-ref-40)