



Legislative Assembly for the
Australian Capital Territory

Standing Committee on Public
Accounts and Administration

Submission Cover Sheet

Inquiry into Inquiry into Auditor-General Reports 10/2024: Safer Families Levy and 13/2024: Invoicing and Payment for Digital Health Record Hosting Services

Submission number: 002

Submitter: YWCA Canberra

Date authorised for publication: 8 September 2025



YWCA CANBERRA

**Inquiry into Auditor-General Performance Audit Report
10/2024: Safer Families Levy**

Leah.dwyer@ywca-canberra.org.au

Acknowledgement of Country

YWCA Canberra proudly recognises the rights of Aboriginal and Torres Strait Islander peoples to own and control their cultures and pays our respect to these rights. YWCA Canberra acknowledges the need to respect and encourage the diversity of Indigenous cultures and to respect Indigenous worldviews, lifestyles and customary laws. We extend our respect to the Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and will continue to always be Aboriginal land.

About YWCA Canberra

YWCA Canberra is a feminist not-for-profit organisation that has provided community services and represented women's issues in Canberra since 1929. Our mission is 'We strengthen communities by supporting girls and women through our services and we provide essential, quality services for women, girls and families in the ACT and surrounding regions. We work in the areas of children's services, community development, homelessness and affordable housing, youth services, personal and professional training, women's leadership and advocacy.

We are externally accredited against the [Quality Improvement Council \(QIC\) Health and Community Service Standards \(7th Edition\)](#). Accreditation against the QIC standards support us to improve client and community engagement, diversity and cultural appropriateness, management systems, governance and service delivery, while committing to a cycle of continuous quality improvement. In addition to the QIC standards, we are accredited against the following external client-related service standards for our key areas of work:

- [Australian Charities and Not for Profit Commission](#)
- [National Quality Standard for Early Childhood Education and Care and School Aged Care](#)
- [National Regulatory System for Community Housing](#)
- [Registered Training Organisations Standards](#)

Through our national Affiliate Association with YWCA Australia, we are part of the World YWCA network, which connects 120 countries across the globe.

Introduction

YWCA Canberra welcomes the opportunity to provide feedback to the *Inquiry into Auditor-General Performance Audit Report 10/2024: Safer Families Levy*.

We actively participated in consultations with the ACT Audit Office on the Safer Families Levy and have been longstanding advocates for greater transparency and accountability in its implementation. Our advocacy work has consistently made use of all available resources to gather an improved understanding of its impact and use.

This submission highlights three key themes arising from the audit report and its processes including:

- **Audit timeline and process**
- **Findings and recommendations**
- **Data opportunities**

Audit Timeline and Process

Beginning in 2021, along with ACTCOSS, YWCA Canberra lobbied the ACT Audit Office to include an audit of the Levy in the forthcoming 2022-2023 audit program.

The following is a timeline of our engagement with the Audit office, and progress of the report:

- We contacted the Audit Office on 17 July 2023 regarding an update on the proposed audit of the Safer Families Levy. This correspondence indicated the Levy had been slated as part of the future Audit program since 2022.
- A response from the Audit Office was received the same day indicating an imminent commencement of the interview process.
- We were formally invited to take part in the audit on 29 September 2023.
- YWCA Canberra was interviewed by the Audit Office on 13 October 2023.
- Advice from the audit office, as well as the audit program itself indicated that the audit report would be completed within the first quarter of 2024, and certainly by the end of 2023-2024 Financial Year.
- The final audit report was released on Friday 22 November 2024.

Delays

The protracted delay in the release of the report, from an initial release timeline of April 2024 to November 2024 caused us to query engagement between the audit office and the Domestic, Family and Sexual Violence Office (DFSVO) including possible delay tactics, deliberate or otherwise, from the DFSVO.

In the period following the release of the 2023-2024 ACT Budget, YWCA Canberra queried whether the DFSVO had received a draft copy of the Audit report and findings, prior to the realignment of the Levy expenditure in the Budget. This new realignment saw the Levy revenue be overwhelmingly directed towards the frontline women's safety sector, rather than service government projects and overheads, something the sector had been demanding for several years.

The advice received was that the draft report was yet to be sighted. While the audit report includes dates relating to correspondence between the Audit Office, the Chief Minister, and the Head of Service regarding deliberative Cabinet information, there is no detail relating to timeframes where information was sought from the DFSVO. We believe there is a public-interest element in releasing information on correspondence between the Audit Office and the DFSVO and when the DFSVO was first made aware of any interim findings.

Given the extended window of time, this delay allowed a realignment of Levy expenditure in the 2024-2025 ACT Budget. This, along with the timing of the report's release to after the 2024 ACT Election, meant the ACT Government was able to somewhat navigate criticism of the use of the Levy as by the time the report was released, the expenditure had already been redirected towards frontline programs, and the 2024 Election had been conducted.

The sector was also caught off guard by the release of the report. Despite YWCA Canberra's participation in the interview process and ongoing engagement throughout the course of the investigation, there was no prior communication with sector stakeholders from the Audit Office regarding the report's imminent release.

Findings and recommendations

YWCA Canberra broadly supports the findings of the ACT Audit Office, notably that public reporting was not transparent or effective at tracking expenditure and connecting the ratepayer to tangible efforts to end violence against women. We also support comments by the Auditor General that funding of initiatives was not driven by an ACT specific strategy or supported by a formal decision-making process. For much of the operational management of the Levy, the expertise of, and shifting demand seen by frontline specialist domestic and family violence services like YWCA Canberra appeared to be peripheral to funding decisions. Given the ACT Government's own description of the Office of the Coordinator General for Family Safety "*to provide strategic leadership, coordination, policy analysis and innovation expertise to drive cultural change and system reform, and to build whole-of-government and whole-of-*

community capability to address DFV,¹ the failure to develop a strategy to guide the purpose and use of the Levy is problematic.

We also note the report's comments regarding performance documented through reporting and evaluation: *While some metrics have been cited, information such as experiences through the various programs and changes in attitudes and behaviour arising from the programs and other activities have not been reported.*² In particular, the report notes that only two of the eight initiatives (Room4Change and the Family Violence Safety Action Program) had been evaluated at the time of writing. Further, while these two programs accounted for around \$3.2 million in expenditure in the 2023-2024 budget cycle, the evaluations of effectiveness and potential impact remain undisclosed.

This is an unfortunate oversight in both the transparency of selected programs and in furthering collective expertise and understanding of perpetrator behaviour intervention and high-risk response initiatives. Notably, both Room4Change and FVSAP are cited in the *Domestic and Family Violence Death Review* as examples of progress under Focus Area 8: Perpetrator accountability and rehabilitation. This focus area emphasises the importance of working with perpetrators, including those with mental illness, substance use issues, and adolescents who use violence, to improve accountability and support rehabilitation. Where programs account for a significant portion of Levy expenditure and are an important policy feature in the ACT Government's commitment to the National Plan's prevention and response framework, we believe there is sufficient public interest for evaluations regarding the impact of these programs to be publicly available.

Under the Third (2016–2019) and Fourth (2019-2022) Action Plans, ACT Government messaging endeavoured to align the Plans with the national priorities of the *National Plan to End Violence against Women and Children*. The Audit report notes however, that it is difficult to connect the activities of the Third Action Plan to Safer Families initiatives and the objectives of the National Plan. While this opacity was somewhat abated in the Fourth Action Plan, it would seem this improvement only occurred due to the ACT Government meeting its national reporting obligations. As the report notes: *because additional information is provided on the Australian Government Department of Social Security website.*³ This observation follows trends outlined in the Audit report, where the ACT Government effectively outsourced obligations it may have had to the ratepayer to the Australian Government instead. As noted in the findings by the Audit office:

¹ ACT Government (2021) [Submissions – Parliament of Australia](#); submission 146.

² [Report No. 10 of 2024 - Safer Families Levy](#) (4.20, pg 81).

³ Op cit (2.18, pg 39).

In March 2018, following the nominal end of the 2011 Strategy, the ACT Government identified that the National Plan to Reduce Violence against Women and their Children 2010-2022 (2010 National Plan) would represent its overarching strategy for its response to domestic and family violence. No other ACT-specific strategy has been implemented since then to provide a framework for the intent and purpose of the Safer Families Levy and associated domestic and family violence initiatives funded through the levy.⁴

Concerns regarding whether the ACT Government's own action plan projects aligned with the objectives of the National Plan and matched the scale of interstate initiatives, where no such Levy instrument existed, were reinforced through the reporting via the national plan4women's safety portal.⁵ We support the findings of the Audit report that no formal process for use of Levy existed undermining the contribution the sector was able to make towards targeted initiatives.

Recommendations:

- 1) Evaluations capturing key prevention and response programs, funded through the Levy, should be made publicly available.**
- 2) Evaluations of the ACT Government Domestic, and Family Violence Training Strategy be publicly available.**
- 3) Safer Families reporting in the Community Services Directorate Annual Report should consistently include updates including but not limited to:**
 - Staffing levels and external contracting within the Office of the Coordinator-General for Family Safety;**
 - Breakdown of funding and programs supported through the National Partnership Agreement on Family, Domestic and Sexual Violence Responses 2021–27; and**
 - Outcomes and impacts for projects funded under the Innovation Pilot Projects scheme.**

Data opportunities

While public data reporting on the effectiveness of funded programs is inconsistent or absent, there is also the pressing issue of the ACT's poor quality of data on domestic, family and sexual violence more broadly. While the Audit Report notes that an absence of performance

⁴ Op Cit (2.12, pg 2).

⁵ [Initiatives – National Plan to Reduce Violence against Women and their Children](#) (accessed 25 August, 2025)

data is particularly pronounced for the five Safer Families initiatives, YWCA Canberra also holds significant concerns regarding data capture in the ACT that limits our understanding of violence in the community. A nationally consistent approach to reporting on local incidents of domestic, family and sexual violence does not currently exist and the presentation of data varies considerably across jurisdictions. The Personal Safety Survey, available through the ABS, and ACT police data provides some indication of the population-level prevalence of domestic and sexual violence in the ACT. Beyond this, data from service organisations or government reporting obligations can be useful in developing a comprehensive understanding of violence in the territory, however they can be inaccessible and cumbersome. The gap in data quality and availability must be addressed as the policy landscape continues to evolve.

The quality of ACT Police data and reporting remains a significant barrier to understanding violence in the community. In relation to current sexual violence reporting or domestic and family violence incident reporting, there is no further analysis available on age, behaviours, gender, relationship of parties, or trends over time.⁶ YWCA Canberra considers the limited useability of reporting data reflects broader issues of data quality, research and expertise throughout domestic and family violence policy landscape in the ACT. As the audit report noted, there was often an absence of evidence behind decisions to fund certain initiatives⁷ and where reporting data was made available, there is limited evidence the DFSVO took it into account.⁸

We draw attention to recent comments from the South Australian Royal Commission into Domestic, Family and Sexual Violence, which noted that the lack of reliable data prevents an accurate measurement of the dynamics of violence and the capacity to assess impact of scaled policy initiatives.⁹

Unlike data portals such as NSW's Bureau of Crime Statistics and Research (BOCSAR), which provides regular and user-friendly on a suite of crime data, no such portal of a similar standard exists in the ACT. This makes it difficult not only to understand emerging policy needs and trends, but also to understand wider patterns of violence across relevant social and demographic indicators. Without usable and relevant datasets, service providers and policymakers operate in an information vacuum, relying on assumptions rather than evidence. Addressing this lack of information will become crucial as the ACT Government considers criminalising coercive control. Criminalisation will require a fundamental shift across the justice system in terms of how violence and threats of violence are recorded, recognised and

⁶ [Crime Statistics | ACT Policing](#) monthly reporting

⁷ [Report No. 10 of 2024 - Safer Families Levy](#) Finding 2.79.

⁸ [Report No. 10 of 2024 - Safer Families Levy](#) Finding 3.77

⁹ [Royal Commission into Domestic, Family and Sexual Violence Report](#), pg 111.

understood. To close this gap and prepare for forthcoming reforms, the ACT must invest in improved data infrastructure.

Recommendations:

- 1. The ACT Government should conduct an audit of the existing data landscape with a plan to benchmark against pre-existing best-practice models from other jurisdictions.**
- 2. The ACT Government lead the development of a crime portal to capture, among other crimes, domestic, family, and sexual violence reporting, incident and outcome data dashboard, of a similar scale to NSW's BOCSAR platform.**