



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

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AFPA

Australian Federal
Police Association

Submission on Auditor-General's Report No. 10 of 2024: Safer Families Levy

**Standing Committee on Public Accounts
and Administration**

Submission by the Australian Federal Police Association

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Foreword

The Australian Federal Police Association (AFPA) appreciates the opportunity to contribute to the Standing Committee on Public Accounts and Administration's Inquiry into the Auditor-General's Performance Audit Report 10/2024, which focuses on the Safer Families Levy. We recognise the importance of this inquiry in evaluating how effectively the levy is being managed and its impact on addressing domestic and family violence in the community.

We grant full permission for this submission to be made publicly available, demonstrating our commitment to transparency and accountability in this important matter. Additionally, we would welcome the opportunity to appear before the Committee should public hearings be scheduled, as we believe direct engagement can provide valuable insights from the perspective of frontline police officers and help shape practical solutions moving forward.

The AFPA

The AFPA is a registered organisation and functions as an independent sub-branch of the Police Federation of Australia. It represents the industrial, political, and professional interests of Australian Federal Police (AFP) employees, including members of ACT Policing, as well as law enforcement officials within the Australian Criminal Intelligence Commission and staff from the Department of Parliamentary Services.

Our members deliver a vital service to the country. They are the foundation of the Commonwealth's primary law enforcement body, responsible for a wide range of investigative, intelligence, and national security duties.

The AFP provides community policing in the Australian Capital Territory and other territories including Christmas Island, Cocos (Keeling) Islands, Norfolk Island, and Jervis Bay. It enforces Commonwealth laws targeting complex, transnational, serious and organised crime, as well as child exploitation, fraud, corruption, and cybercrime. The agency works to protect Australians and national interests from terrorism and violent extremism and is responsible for confiscating wealth and property gained through criminal activity.

AFP and ACT Policing officers protect key Commonwealth infrastructure such as designated airports, Parliament House, and embassies. They also safeguard domestic and foreign dignitaries, including the Governor-General, Prime Minister, and ambassadors, along with other at-risk individuals.

Internationally, the AFP represents Australian policing and law enforcement interests and is constantly developing specialist capabilities and using advanced technology to protect and promote Australia's national interests.

Introduction

The AFPA, representing members of ACT Policing, welcomes the release of the Auditor-General's Report No. 10 of 2024. The report provides a much-needed assessment of how the Safer Families Levy is being managed and whether it is delivering on its intended purpose of addressing domestic and family violence in the Australian Capital Territory.

The AFPA agrees with the report's findings, especially its identification of serious problems in how the levy has been managed. Issues like poor transparency, weak monitoring of performance, and limited involvement of frontline workers have all weakened the levy's impact. These are not just theoretical concerns, as we see similar problems with the ACT Government's Police, Fire and Emergency Services Levy as well.

For our members, who are often the first to attend domestic and family violence incidents, the availability and quality of support services directly affect the safety and wellbeing of victims. When programs are underfunded, mismanaged, or out of touch with what happens on the ground, it creates dangerous gaps that put families at greater risk and increase the strain on ACT Policing and related support services.

The AFPA is deeply concerned about how the levy is currently being used. In this response, we offer a series of practical and realistic measures aimed at improving the way levy funds are managed, evaluated, and delivered. These include clearer reporting, stronger accountability mechanisms, and more direct input from police and other frontline professionals. We believe these changes are essential if the levy is to fulfil its original intent of supporting victims and reducing harm in the community.

We also examine the ACT Government's response to the Auditor-General's recommendations, which were tabled in the Legislative Assembly on 19 March 2025. While the Government has acknowledged several of the report's findings, there is still work to be done to ensure that meaningful reforms are implemented.

The AFPA urges the ACT Government to move beyond words and commit to genuine improvements in policy, funding oversight, and service delivery. The stakes are too high for half measures and families experiencing violence deserve nothing less than a system that is accountable, responsive, and built on the insights of those working at the front line.

Support for the Auditor-General's Findings

The AFPA strongly supports the findings of the Auditor-General's Report, particularly the identification of major shortcomings in transparency, performance monitoring, and stakeholder engagement. These weaknesses directly impact the ability of the Safer Families Levy to deliver effective support to victims of domestic and family violence and to meet the broader goal of improving community safety.

The report makes it clear that transparency in how levy funds are allocated and spent is lacking. There is no central, accessible source of information outlining how funds are used or what outcomes have been achieved. This lack of visibility makes it difficult for the public to trust that the levy is being managed effectively, and it undermines accountability for decision-makers.

ACT Policing members, who work closely with affected communities, consistently stress the importance of clear, public reporting. Transparency is not just a matter of good governance, it is critical to maintaining public confidence and ensuring that resources are being directed where they are needed most.

Performance monitoring is another significant area of concern. The Auditor-General found that the Domestic, Family and Sexual Violence Office (DFSVO) has not developed a performance monitoring strategy or an evaluation framework to measure the impact of levy-funded initiatives (Report, Page 7). Without proper tracking and evaluation, it is nearly impossible to determine whether programs are effective, whether they reduce harm, or whether changes are needed. For frontline officers responding to domestic and family violence incidents, this lack of evidence-based assessment means that lessons are not being learned, progress is difficult to measure, and the same gaps continue to put victims at risk.

Stakeholder engagement has also been limited. According to the report, there has been insufficient consultation with key voices, including community sector organisations and frontline responders (Report, Page 51). This disconnect has resulted in programs that do not fully reflect the needs of the people they are designed to support. ACT Policing members bring valuable firsthand insight into the practical challenges of responding to domestic and family violence, but their perspectives have not been adequately included in the planning and review of levy-funded initiatives.

Compounding these issues is the absence of a shared evaluation framework to assess the overall impact of Safer Families programs (Report, Page 78). Each initiative appears to be assessed in isolation, making it difficult to understand how they work together, or fail to, in meeting the broader goals of safety, prevention, and support. Without common benchmarks or coordinated reporting, aligning policing strategies with community services becomes more difficult and less effective.

These findings reflect what ACT Policing members have experienced in their day-to-day work. The Safer Families Levy has the potential to be a valuable tool in preventing domestic and family violence, but its impact is being undermined by poor oversight, limited transparency, and a lack of practical input from those working on the front lines. Addressing these gaps must be a priority if the levy is to achieve the outcomes it was designed to deliver.

Concerns Regarding the Safer Families Levy

The AFPA has serious concerns about several aspects of the Safer Families Levy's implementation that directly affect our members' ability to respond effectively to domestic and family violence. While we support the findings of the Auditor-General's report, our members' frontline experience reveals additional issues that compound the challenges already identified.

One of the most pressing problems is the ongoing lack of transparency around how levy funds are allocated and what outcomes they are achieving. The report notes that financial reporting is often incomplete or difficult to interpret, with no single, accessible overview of how funds are being spent (Report, Pages 81–95). In many cases, financial information is presented without clear context or explanation (Report, Page 91), making it difficult for both the public and stakeholders to assess whether programs are delivering meaningful support to victims or achieving broader violence prevention goals.

Performance monitoring also remains inconsistent. Several initiatives funded by the levy, such as the Family Violence Safety Action Program, lack SMART (specific, measurable, achievable, relevant, and timely) performance indicators (Report, Page 64). Without these, it is difficult to evaluate effectiveness or coordinate efforts between community services and ACT Policing. The absence of clear benchmarks not only limits accountability but also reduces opportunities to improve or adjust programs based on evidence.

There is also an imbalance in how funding is distributed across the service spectrum. While crisis services receive a significant share of the budget, ranging from 34 to 46 percent annually, early intervention and prevention remain underfunded (Report, Page 55). This approach puts greater pressure on ACT Policing to respond once situations escalate, rather than preventing harm in the first place. A stronger focus on early intervention could help reduce long-term demand on both police and community services.

Another major concern is the absence of a current, system-wide needs assessment. The last comprehensive gap analysis was conducted in 2016 (Report, Page 50), meaning many levy-funded initiatives may be based on outdated assumptions. As domestic and family violence becomes more complex, including the growing recognition of coercive control, services and responses must adapt accordingly. Without a contemporary assessment of community needs and frontline challenges, there is a risk that funding and programs are misaligned with where support is most urgently required. A thorough, updated needs analysis is essential to ensure resources are directed effectively and services are designed to meet the realities of today.

In addition to the issues raised by the Auditor-General, the AFPA has identified further concerns based on feedback from our members. Program delivery across the ACT remains uneven, with some areas reporting limited access to crisis support, counselling, and prevention services. This inconsistency leaves some victims without adequate support, depending on where they live.

Training for frontline responders is another area in need of attention. While the levy funds some training initiatives, many officers report that the training provided is outdated, inconsistent, or lacks practical application. Ensuring that ACT Policing members are equipped to manage complex domestic and family violence cases requires investment in modern, scenario-based training that reflects the challenges they face in the field.

Support services themselves remain underfunded. Despite the levy's stated purpose, allocations have not kept pace with rising demand for shelters, legal expertise, and therapeutic services. When these services are stretched thin, police are often left to fill the gaps, placing additional pressure on ACT Policing resources and limiting the long-term effectiveness of the system.

Lastly, there is a general lack of public awareness about the Safer Families Levy. Many ACT residents are unaware that it exists or what it is meant to support. This lack of awareness not only weakens community engagement but also reduces public pressure for accountability and improvement.

Taken together, these issues point to the need for a more strategic and coordinated approach. The Safer Families Levy has the potential to drive real change, but it must be supported by clear oversight, fair funding distribution, robust evaluation, and stronger partnerships with those on the frontline.

AFPA's Approach to Addressing the Issues

To improve the effectiveness, transparency, and long-term impact of the Safer Families Levy, the AFPA proposes a series of practical and achievable actions. These proposals are grounded in the operational knowledge of frontline police and aim to ensure levy-funded initiatives deliver meaningful outcomes for victims and the wider community. The following five focus areas outline how the AFPA would contribute to strengthening the management and delivery of levy programs.

Establish a Comprehensive Performance Monitoring Framework

A consistent weakness in the current approach is the lack of measurable outcomes and program accountability. The AFPA would work closely with the Domestic, Family and Sexual Violence Office (DFSVO) and the Community Services Directorate to co-develop a shared evaluation framework based on SMART principles—specific, measurable, achievable, relevant, and timely indicators. This would include metrics such as changes in domestic violence incident rates reported to ACT Policing, repeat offender data, and victim follow-up outcomes. We would also help form a working group involving police, DFSVO, and community sector representatives to ensure evaluation tools reflect frontline realities. As a starting point, we recommend piloting this framework through the Family Violence Safety Action Program, integrating police incident data to test its practical value before applying it more broadly.

Improve Public Reporting and Transparency

Transparency is essential to build trust in the levy's purpose and to show that public funds are being used effectively. The AFPA proposes the creation of a dedicated, user-friendly online portal on the ACT Government website, managed by the DFSVO. This portal should include annual and quarterly breakdowns of levy revenue, expenditure, funded initiatives, and program outcomes. We would contribute by advising on police-relevant performance indicators, such as reductions in call-outs, recidivism trends, and the effectiveness of referral pathways. We would also advocate for regular data updates and summary dashboards to ensure reporting remains current, consistent, and easy to understand for the public.

Prioritise Prevention and Early Intervention

The current funding model places heavy emphasis on crisis services, with limited investment in prevention and early intervention. This approach, while important, does not reduce the long-term burden on police or support services. The AFPA would advocate for a rebalancing of levy funds to ensure that more resources are allocated to early-stage interventions.

We would request the DFSVO and partner agencies to design and support programs aimed at reducing risk before incidents escalate, including education campaigns, early support services, and perpetrator behaviour change initiatives. The AFPA would also support expansion of programs like Room4Change, ensuring these are informed by police data and insights on repeat offending patterns and regional demand.

Conduct Regular Systemic Needs Assessments

A current, data-driven understanding of community needs is critical to ensuring levy programs remain targeted and relevant. The AFPA proposes that comprehensive systemic needs assessments be conducted at least every two years.

ACT Policing data and operational insights to these assessments and advocate for the inclusion of voices from community services and victim-survivors would be vital. The findings should feed directly into budget planning processes to make sure funding keeps pace with demand and addresses real, emerging gaps, particularly as domestic and family violence trends evolve.

Additional Measures

Beyond these core proposals, the AFPA supports several complementary actions to improve the impact of the levy. These include:

- Developing a modern, trauma-informed training program for ACT Policing members, with regular updates and practical case-based learning to strengthen responses to complex cases.
- Standardising service delivery across the ACT to ensure equal access to crisis and support services in all regions.
- Increasing funding for shelters, legal services, and 24/7 helplines to reduce pressure on police and ensure victims receive timely support.
- Launching a targeted public awareness campaign to improve understanding of the Safer Families Levy, its purpose, and the services it funds. This campaign should be promoted across social media, local media outlets, community events, and through partnerships with frontline organisations.

Together, these actions would help transform the Safer Families Levy into a more effective, transparent, and accountable mechanism for addressing domestic and family violence in the ACT.

Evaluation of the ACT Government's Response to the Report

The ACT Government's response to the Auditor-General's recommendations, tabled on 19 March 2025, signals a willingness to improve the management of the Safer Families Levy.

The government has formally accepted all four recommendations, committing to enhancements in transparency, performance monitoring, stakeholder engagement, and public reporting. While this commitment is a welcome step, the AFPA believes the response lacks the clarity, urgency, and structure needed to drive real change.

Based on the experience of our members and the operational challenges they face, we offer the following analysis and recommendations to strengthen the government's proposed actions.

Commitment to a New Domestic, Family and Sexual Violence Strategy

The ACT Government has committed to developing a new strategy in 2025, incorporating seven Safer Families Levy Principles and communication products such as information sheets delivered with ACT rates notices.

However, the response lacks detail on timeframes, consultation processes, or how it will incorporate the lived experiences of victim-survivors and insights from frontline responders.

AFPA Recommendations:

The ACT Government should set a clear timeline for finalising the strategy, with a target completion date by the end of 2025 and defined milestones for stakeholder engagement.

Communication efforts should go beyond information sheets to include a dedicated online portal in accessible, multilingual formats. To support meaningful input, we recommend establishing a permanent advisory council that includes victim-survivors, and community organisations to guide the strategy's design and implementation.

Performance Monitoring and Evaluation Framework

The ACT Government agrees to develop a common evaluation framework and provide regular updates to the Coordinator-General. This response does not describe how the framework will be built, who will be consulted, or how it will ensure outcomes are measurable and useful for operational decision-making.

AFPA Recommendations:

The evaluation framework should be developed collaboratively, involving the stakeholders, community organisations, and service users. It must include SMART indicators: specific, measurable, achievable, relevant, and timely, such as reduction in incident rates, response times, and victim satisfaction levels.

Reporting should extend beyond internal updates to the Coordinator-General. It should include regular public releases via an open, accessible online platform. A clear deadline for completing the framework, preferably aligned with the 2025–26 or 2026–2027 ACT Budget cycle, should be set to ensure timely integration into policy and funding decisions.

Biennial Reporting by the Domestic and Family Violence Death Review

The ACT Government has committed to tabling Ministerial Statements and considering legislative amendments to the *Domestic Violence Agencies Act 1986*. While this is a positive step, the response provides little information about how progress will be tracked or how stakeholders, particularly ACT Policing, will be involved.

AFPA Recommendations:

A transparent and public tracking mechanism should be introduced to monitor implementation of past and future recommendations. This could take the form of an online dashboard showing the number of recommendations made, acted upon, or pending, updated annually.

Legislative amendments to the *Domestic Violence Agencies Act* should be prioritised and introduced to ensure consistent and accountable reporting structures.

Public Reporting Processes

The ACT Government agrees to improve reporting by integrating levy updates into ACT Budget papers, Ministerial Statements, and annual reports. The plan continues to rely heavily on fragmented existing processes that have previously been criticised for inconsistency and limited public accessibility.

AFPA Recommendations:

The ACT Government should commit to developing a centralised, user-friendly online portal that consolidates all levy-related reporting. This portal should serve as the single source of truth, providing clear data on revenue, expenditure, program activities, and outcomes.

Reports should be available in multiple formats and languages to ensure they are accessible to all community members. Importantly, the reporting should include variance analysis, explaining any major differences between expected and actual results, consistent with the Auditor-General's findings and recommendations.

Addressing Gaps in the Government's Response

While the ACT Government acknowledges the need for improvement, the response does not address several critical areas highlighted by the AFPA and reflected in operational experiences:

- There is no reference to underfunding or inconsistent program delivery across the ACT.
- The ACT Government does not commit to addressing training gaps or resourcing shortfalls affecting frontline responders.
- There is no plan to assess how levy-funded services are meeting the needs of different regions or demographic groups.

AFPA Recommendations:

A biennial needs assessment should be mandated to identify emerging service gaps, track regional disparities, and guide funding priorities. This should be supported by data from ACT Policing, community services, and victim-survivors.

Additionally, dedicated funding should be allocated for expanding access to training for police and other responders, updating curricula to reflect modern, trauma-informed practices.

Finally, a focus on prevention and early intervention must be embedded in all future strategy and funding decisions, supported by measurable goals and realigned budget allocations.

In summary, while the ACT Government's response demonstrates an awareness of the issues, the AFPA believes it must be strengthened through clearer timelines, inclusive engagement, better performance tracking, and more transparent public reporting.

Conclusion

The AFPA strongly supports the Auditor-General's Report No. 10 of 2024 and its recommendations to improve the management and impact of the Safer Families Levy.

As frontline responders, our members see firsthand the importance of effective, well-funded programs to address domestic and family violence. Unfortunately, the levy's current structure is held back by ongoing issues around transparency, performance monitoring, stakeholder engagement, and uneven program delivery.

The ACT Government's response to the report is a welcome step, but it lacks the level of detail, urgency, and collaboration needed to deliver lasting change. To improve outcomes, the ACT Government should adopt a more robust evaluation framework, strengthen public reporting, commit to meaningful stakeholder engagement, prioritise prevention, and support regular needs assessments. The AFPA's proposed reforms are practical and evidence-based, and we believe they would significantly enhance the levy's effectiveness.

The AFPA is committed to working closely with all key stakeholders to ensure the Safer Families Levy achieves its full potential in building a safer ACT.