

Statewide disability and family violence crisis response initiative program requirements

Version 5

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# Introduction

Supporting people with disability who are experiencing family violence is essential for ending family violence. People with disability, and women and girls in particular, are more likely to:

* experience family violence than those without disability
* experience it from more perpetrators
* experience it for longer.[[1]](#footnote-2)

Women and girls with disability are twice as likely to experience physical or sexual violence than those without. Sixty-five per cent have experienced some form of violence after reaching the age of 15. This compares with 45 per cent of women without disability.[[2]](#footnote-3) This reflects what we know about the drivers of family violence – that it stems from:

* unequal distributions of power and resources
* more limited choice based on a person’s gender
* rigidly following gender roles.[[3]](#footnote-4)

Gender inequality intersects with ableism and other forms of discrimination to create added risk for women with disability.

People who use violence against people with disability often use tactics specific to the victim survivor’s disability including:

* withholding or forcing medication or health care
* limiting access to assistive devices and aids
* withholding care and controlling finances through legal guardianship.

These forms of violence are in addition to threats and intimidation, and physical, sexual and emotional violence.

Victim survivors with disability also face added barriers when seeking help or trying to leave violent situations due to their:

* reliance on the perpetrator/caretaker
* risk of isolation
* fear of not being believed
* past experiences of discrimination contributing to a hesitancy in seeking help.

They may also have specific requirements for access to transport and housing.

In a similar way, a victim survivor who has a child with disability can face barriers or abuse linked to their child’s care needs, when seeking to leave family violence.

Even when they leave a violent relationship, people with disability are 2.4 times more likely to be stalked than people without disability. Women with disability are most at risk.[[4]](#footnote-5)

## The Disability and Family Violence Crisis Response Initiative

The Statewide Disability and Family Violence Crisis Response Initiative (DFVCRI) is one in a suite of Victorian Government reforms to address family violence. The investment in the DFVCRI recognises all the above factors. It recognises that child and adult victim survivors with disability deserve the support to be safe and recover from family violence.

The initiative gives victim survivors with disability access to immediate support if they are in crisis. They may also access other family violence flexible funding to cover their disability and their family violence crisis costs (refer to ‘Policy and context’). The DFVCRI also offers secondary consults for practitioners in both family violence specials services and non-specialist family violence services who are supporting victim survivors with disability. This includes capacity-building sessions on:

* how to best support people with disability experiencing family violence
* safety planning considerations
* how to access family violence services and supports.

This initiative is funded by Family Safety Victoria (FSV), a division of the Department of Families, Fairness and Housing. Safe Steps delivers the initiative. Safe Steps is the statewide 24/7 helpline service for victim survivors of family violence. FSV and Safe Steps commit to providing child and adult victim survivors with disability with access to inclusive, and equitable specialist family violence support 24 hours a day, 7 days a week.

# Purpose and context

These program requirements outline the supports available through the DFVCRI. Family violence victim survivors with disability can access these across Victoria. The document also:

* sets out the eligibility requirements
* defines key terms
* outlines roles and responsibilities across the service system.

Victim survivors with disability, or victim survivors who have a child with disability, who are not already connected to specialist family violence support services can contact:

* The Orange Door or their local specialist family violence service (during business hours), or
* the Safe Steps Family Violence Response Centre (24 hours a day, seven days a week).

## Policy context

Supporting victim survivors with disability experiencing family violence is a shared responsibility. These program requirements build on and complement the following policies:

* Multi-Agency Risk Assessment and Management (MARAM) Framework
* the Family Violence and Child Information Sharing schemes
* the Case Management Program Requirements for specialist family violence services supporting victim survivors
* the family violence crisis response model.

These supports and services work alongside efforts of:

* the courts
* Victoria Police
* others looking to hold perpetrators to account.

Only by working together will we enable all people with disability to live thriving lives free from fear and violence.

## Prevention and accessible support

The DFVCRI is one of a set of programs that look to address family and sexual violence for Victorians living with disability. We recognise that more needs to be done to prevent violence in the first place and to provide supports before things reach crisis point.

* For more on Victoria’s work to support people with disability, refer to [*Inclusive Victoria: state disability plan*](https://www.vic.gov.au/state-disability-plan) *2022–2026* https://www.vic.gov.au/state-disability-plan.
* You can also read FSV’s [*Everybody Matters: Inclusion and equity statement*](file:///C%3A/Users/rtam0103/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/4VSRT7OC/Everybody%20Matters%3A%20Inclusion%20and%20equity%20statement)

https://www.vic.gov.au/everybody-matters-inclusion-and-equity-statement

* For more on the government’s work to prevent family violence, refer to [Free from violence: Victoria's strategy to prevent family violence | vic.gov.au (www.vic.gov.au)](https://www.vic.gov.au/free-violence-victorias-strategy-prevent-family-violence) https://www.vic.gov.au/free-violence-victorias-strategy-prevent-family-violence.

# Disability and Family Violence Crisis Response Initiative

## Objectives and components

The DFVCRI aims to:

* build capacity across services supporting child and adult victim survivors with disability
* provide immediate practical help to victim survivors with disability in crisis.

The initiative has three components, which align to these objectives.

### 1. Secondary consultation

The DFVCRI looks to build capacity across the family violence sector and more broadly, to better support victim survivors with disability.

Service providers and professionals can contact Safe Steps Disability Family Violence Liaison Officers (DFVLOs) for secondary consultations. DFVLOs have experience in working with people with disability as well as people experiencing family violence. DFVLOs can provide:

* advice on safety planning
* information on disability-specific needs
* referrals to other specialist disability support services.

This enables specialist family violence practitioners and mainstream professionals to provide tailored support.

### 2. DFVCRI brokerage – immediate practical help in a crisis

The DFVCRI looks to give practical help to child and adult victim survivors with disability who need immediate disability-related supports to stay safe and/or escape family violence. This applies whether they are in emergency accommodation or at home.

Meeting the victim survivor’s immediate disability-related needs is an important part of a family violence response. DFVCRI brokerage addresses barriers to safety for victim survivors with disability. This includes the fear of losing access to vital daily supports or equipment. For example, a victim survivor who relies on support from a person using violence against them will get the supports, disability aids or equipment they need to leave an unsafe situation.

DFVCRI brokerage can cover immediate disability-related support costs regardless of the type of crisis accommodation accessed by the victim survivors with disability. It can include:

* supports needed to stay at home
* supports needed to access a family violence accommodation service or other private emergency accommodation (such as motel-like accommodation) in the immediate to short term.

More about supports available via DFVCRI brokerage is set out under ‘What can be purchased using the DFVCRI brokerage?’.

The DFVCRI complements existing specialist family violence responses to support victim survivors to stay safe in the short term. There are other flexible funding sources for costs related to longer term disability-related needs. Where longer term family violence needs are identified, a specialist family violence case worker is allocated. The case worker will assist the victim survivor with these needs. This includes support to access any funding available to them.

It is important to note that the DFVCRI does not offer case management support. Where victim survivors with disability need this support, Safe Steps will make a warm referral.

Safe Steps also leads (or supports) the initial crisis response and addresses immediate accommodation needs. This includes when the person needs an out-of-area placement into emergency accommodation.[[5]](#footnote-6)

### 3. Sector capacity building and awareness raising

The DFVCRI offers information sessions and presentations on disability and disability-based family violence for organisations. This includes information on:

* the prevalence of violence against people with disability
* specific risk factors and forms of violence perpetrated against people with disability
* National Disability Insurance Scheme (NDIS) safety planning considerations
* services available to victim survivors with disability.

## What can be purchased using the DFVCRI brokerage?

DFVCRI brokerage can support a child or adult victim survivor’s immediate disability-related needs while longer term accommodation and supports are explored. Funds are available for:

* attendant care support for disability-related needs such as
	+ personal care
	+ support with shopping
	+ meal preparation
	+ support in providing care of children such as hiring of carers for a parent with disability or for a child with disability
* hiring or buying equipment (where their own equipment cannot be accessed) or links to the Statewide Equipment Program where appropriate
* sign/Auslan interpreting in cases where the government’s interpreter service is not available
* transport costs for accessing disability supports.

DFVLOs often have relationships with disability support workers and providers who can deliver services and equipment at short notice. Victim survivors may choose to contact suppliers themselves if they have a preferred provider.

Short-term funds of up to $9,000 per person are available for up to 12 weeks. Requests for funds over $9,000 are case-by-case.

Other costs related to safety, wellbeing and recovery, whether disability-related or otherwise, can be covered via other brokerage and flexible funding. Several options are available to victim survivors across the family violence service system.

DFVCRI brokerage also allows applications from mainstream or specialist family violence services seeking disability supports that will assist multiple victim survivors with disability in crisis. These are approved on a case-by-case basis in consultation with FSV. Approval considerations include the expected benefits to victim survivors with disability in crisis including:

* safety
* value for money
* the number of victims survivors likely to benefit from the support
* broader demand on the DFVCRI brokerage
* the availability of other options.

## Flexible funding available to family violence victim survivors with disability

Other flexible funding options available to victim survivors include:

* family violence crisis brokerage (FVCB)
* flexible support packages (FSPs)
* The Orange Door brokerage.

All victim survivors with disability who are in crisis can access FVCB. FVCB can meet costs related to family violence crisis responses such as:

* accommodation
* transport
* material aid
* incidental costs associated with specialist family violence support.

FVCB aims to increase the safety and wellbeing of victim survivors of family violence by providing timely and flexible funding for person-centred support during a crisis.

DFVCRI brokerage covers the costs of immediate disability-related services and supports that a victim survivor needs to stay safe. The intention is to respond quickly, reflecting the level of risk the victim survivor faces.

A victim survivor can also access The Orange Door brokerage for crisis-related costs. The Orange Door brokerage offers flexible support to people at risk of or experiencing family violence. It can also cover costs for a person *using* family violence. This applies where the use of brokerage will reduce the risk to, or enhance the safety of, victim survivors.

Victim survivors can also access FSP funding or the Commonwealth’s Escaping Violence Payment Program. These can cover costs associated with:

* accessing support
* moving out of a crisis
* stabilising and improving their safety.

The Escaping Violence Payment Program is for people aged 18 years or older who:

* have recently experienced intimate partner violence
* have a changed living situation and
* are experiencing financial stress.

These flexible funding options are available to all victim survivors with disability. These options complement specialist family violence support services. They are found across the family violence system to respond to the needs of victim survivors. These funding options cover costs, including disability-related costs, associated with safety, wellbeing, gaining independence and recovery and healing.[[6]](#footnote-7)

For more on how to access these other types of flexible funding refer to:

* [*Program requirements for Family Violence Crisis Brokerage*](file:///C%3A/Users/rtam0103/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/4VSRT7OC/Program%20requirements%20for%20Family%20Violence%20Crisis%20Brokerage)

https://fac.dffh.vic.gov.au/program-requirements-family-violence-crisis-brokerage-fvcb

* [*Program requirements for the delivery of family violence flexible support packages*](https://providers.dffh.vic.gov.au/program-requirements-delivery-family-violence-flexible-support-packages)

https://providers.dffh.vic.gov.au/program-requirements-delivery-family-violence-flexible-support-packages

* [*Program requirements for Orange Door brokerage*](https://content.vic.gov.au/sites/default/files/2021-02/Program%20requirements%20for%20Orange%20Door%20brokerage.DOCX.pdf)

<https://www.vic.gov.au/orange-door-practitioner-resources#brokerage-program-requirements>

* the [*Escaping Violence Payment*](https://www.unitingvictas.org.au/services/family-services/family-violence-services/escaping-violence-payment/) https://www.unitingvictas.org.au/services/family-services/family-violence-services/escaping-violence-payment/

## Eligibility

### Who can access the secondary consultation?

Any service provider or professional working with child or adult victim survivors with disability can contact a Safe Steps DFVLO for secondary consultation. A victim survivor does not have to be in crisis to access this part of the service.

### Who can access the DFVCRI brokerage?

To access the initiative, the child or adult victim survivor **must**:

1. Be a victim survivor of family violence and assessed as ‘requires immediate protection’ or ‘at serious risk’ under the MARAM Framework or is assessed to be so by the DFVLO.
2. Have a disability that affects the ability of the victim survivor to leave an unsafe environment without extra disability-related support. This includes impairments related to:
	1. a disability as defined by the *Disability Act 2006* (Vic)
	2. a mental illness, chronic health or ageing condition, or
	3. a temporary or permanent injury resulting from family violence.

Where it is not possible to immediately determine if the victim survivor has a disability, but it is probable that they do and there is an urgent need to respond, funding may be provided for the crisis period (up to 12 weeks).

1. Require disability support related to the impairments set out above, to either access a family violence crisis accommodation response or remain safely in their home or community.

Services looking to purchase disability supports that will help multiple victim survivors with disability must regularly support victim survivors who meet the above criteria in the normal course of service.

### Who can access the sector capacity building?

Any organisation interested in building its capacity to better support child and adult victim survivors with disability can contact Safe Steps to organise a capacity-building session. The session will be tailored to best meet the development needs of the organisation and its workforce.

## How to access support from the DFVCRI

### Secondary consultation

DFVLOs are available for consultation between 9:00 am and 5:00 pm, Monday to Friday. If you would like to speak with one of the DFVLOs, please email disability@safesteps.org.au, or call
1800 015 188.

### DFVCRI **brokerage**

Specialist family violence practitioners and mainstream professionals can contact DFVLOs to discuss applications for DFVCRI brokerage 24 hours a day, seven days a week by calling 1800 015 188.

If contacting during business hours, discussions are first held between the DFVLO and the practitioner or mainstream professional in consultation with the victim survivor. Discussions will cover the most appropriate equipment and support and where this might come from.

Once agreed, the DFVLO will formalise the request through a DFVCRI brokerage application. If approved, the DFVLO will inform the specialist family violence practitioner or mainstream professional in writing. They will then work with them to coordinate supports. The DFVLO will pay for supports and/or equipment on invoice from the relevant service.

If contacting outside of business hours, Safe Steps will respond first and decide on immediate support requirements in the DFVLO’s absence. On the next business day, the DFVLO will discuss applications for other supports beyond those already in place.

### Sector capacity building

To arrange for a capacity building session, please contact Safe Steps via email disability@safesteps.org.au. You can also call 1800 015 188 during business hours to discuss the specific development needs of your organisation.

### Other support from Safe Steps

Safe Steps is the statewide provider of a 24/7 crisis response service to victim survivors in Victoria. They lead the initial phone based crisis response and address immediate accommodation needs to improve safety for referred (including self-referred) victim survivors. They also manage the Family Violence Accommodation Register, receiving and assessing applications for family violence accommodation services from agencies across the state. Safe Steps may also activate a local after-hours crisis response.

## Privacy and information sharing

Safe Steps is prescribed under regulations as a MARAM Framework organisation. The aim of MARAM is to increase the safety and wellbeing of Victorians by ensuring relevant services can effectively identify, assess and manage family violence risk.

As a prescribed organisation, Safe Steps can share information relevant to assessing and managing family violence risk under the Family Violence Information Sharing Scheme (FVISS) and the Child Information Sharing Scheme.

Refer to Chapter 11 of the FVISS guidelines for more on how these information sharing schemes interact with privacy legislation and other confidentiality provisions.

### Data collected and reporting

Safe Steps will collect the following information to administer the DFVCRI:

* age
* gender
* dependants
* age of dependants
* region providing crisis accommodation
* region where applicant usually lives
* disability information
* assistance requested – details of what supports are needed, cost and frequency
* family violence service contact person
* confirmation from the specialist family violence practitioner that the victim survivor or guardian have consented where the supports are for a child with disability.

##

## Roles and responsibilities for accessing DFVCRI brokerage

Table 1: Roles and responsibilities for accessing DFVCRI brokerage

| Action | DFVLO (business hours) | Safe Steps 24/7 helpline (after hours)[[7]](#footnote-8) | Family violence practitioner[[8]](#footnote-9) (including when referred from mainstream services) |
| --- | --- | --- | --- |
| **Assess eligibility and brokerage options** | Assess eligibility.If the victim survivor is not linked to a specialist family violence support service, Safe Steps will make a warm referral. | Assess eligibility.If the victim survivor is not linked to a specialist family violence support service, Safe Steps will make a warm referral. | Case management responsibilities as per case management program requirements. This includes accessing other family violence brokerage for non-disability-related needs. |
| **Discuss disability needs** | Discuss disability-related support needs within funding guidelines with a specialist worker. | Discuss immediate support needs within the funding guidelines with the specialist worker and victim survivor. |  |
| **Approval process** | Approve / not approve requested supports. Advise specialist family violence practitioners of the decision and rationale in writing. | Approve / not approve requested supports related to immediate needs.Refer other non-immediate needs to DFVLO for assessment the next business day. |  |
| **Select service provider** | Provide suggestions for appropriate providers or liaise directly with providers as required to best support client needs.Secure supports. | Provide suggestions for appropriate direct support providers or liaise directly with support providers as required to best support client needs.Secure supports. | If a victim survivor has a pre-existing service provider for required practical help, the specialist family violence practitioner can consult with the DFVLO. On agreement, they can pay directly and invoice Safe Steps. |
| **Collecting information** | Collect required information for DFVCRI brokerage reporting. | Request required information for DFVCRI brokerage reporting to be sent to DRVLO. | As required under case management program requirements and crisis response model, ask whether the victim survivor would like to pursue ongoing disability support. If so, initiate direct contact.  |
| **Follow-up and ongoing supports** | Support specialist family violence practitioners to discuss with the victim survivor whether ongoing disability supports are needed. Provide more information as required. | DFVLO to follow up any outstanding information for DFVCRI brokerage reporting. | Discuss with the victim survivor whether ongoing disability supports are needed. Liaise with the DFVLO as required. |

Figure 1: Roles and responsibilities in DFVCRI brokerage – flowchart



## Feedback and complaints

FSV is committed to ensuring the experiences of individuals and families are valued, understood and acted on. We welcome your feedback because it helps improve how we work.

We can always do better. We will listen to and learn from your feedback whether it’s a compliment, complaint, idea or suggestion.

You can share your feedback through one of the following ways:

* call 1300 758 554 between 9:00 am and 5:00 pm, Monday to Friday
* email your feedback to feedback@familysafety.vic.gov.au.

You can also direct your complaints to Safe Steps in the following ways:

* call 1800 015 188
* email your feedback to privacyofficer@safesteps.org.au.

## Key terms

| Term | Definition |
| --- | --- |
| **Crisis**  | A disruption or breakdown in a person’s or family’s normal or usual pattern of functioning. A crisis cannot be resolved by a person’s customary problem-solving resources/skills. |
| **DFVCRI** | Statewide Disability and Family Violence Crisis Response Initiative. Also referred to as ‘the initiative’. |
| **DFVLO** | Disability Family Violence Liaison Officers, working within Safe Steps. |
| **Disability as defined by the *Victorian Disability Act 2006*** | This includes a sensory, physical or neurological impairment or acquired brain injury or any combination thereof, which:* is, or is likely to be, permanent; and
* causes a substantially reduced capacity in at least one of the areas of self-care, self-management, mobility or communication; and
* requires significant ongoing or long-term episodic support; and
* is not related to ageing; or
* an intellectual disability; or
* a developmental delay.

(Note: For purposes of eligibility to access the DFVCRI, the definition of disability extends beyond the Disability Act –refer to ‘Eligibility’). |
| **Family member (within the context of family violence)** | In the context of family violence, a family member includes:* a person who is, or has been
	+ the relevant person’s spouse or domestic partner
	+ in an intimate personal relationship with the relevant person, whether or not it is sexual in nature
	+ a relative of the relevant person
* a child or young person who regularly lives with the relevant person or has lived with the person on a regular basis in the past, or
* a child of a person who has, or has had, an intimate personal relationship with the relevant person.

A family member also includes anyone else the person sees as being like a family. (This is if it is or was reasonable to regard the other person as such due to the circumstances of the relationship.) A relationship between a person with disability and the person’s unpaid carer or paid support worker may come to be like a relationship between family members. Factors that would be considered include: * the nature of the social and emotional ties
* living arrangements
* length of the relationship
* level of dependence between the parties.

Refer to ss 9 to 11 of the *Family Violence Act 2016.* |
| **Family violence[[9]](#footnote-10)** | Includes behaviour by a person towards a family member of that person that is abusive. Abuse could be physical, sexual, emotional, psychological or economic. It may be threatening or coercive. It also includes any other behaviour that controls or dominates the family member and causes that family member to fear for their safety or wellbeing or that of another person.It also includes behaviour by a person that causes a child or young person to hear or witness, or otherwise be exposed to, the effects of the behaviours referred to above. |
| **Family violence crisis response**  | Victim survivors generally reach out to services when the perpetrator has put their lives and those of their family members in danger (including extended family members and pets). It is when they need immediate support from services to respond to this threat. Family violence crisis responses prioritise victim survivors in crisis situations, assessed to be at ‘serious risk’ and/or at a family violence crisis point from risks posed by perpetrators. |
| **MARAM** | The Multi-Agency Risk Assessment and Management Framework ensures services identify, assess and manage family violence risk. This increases the safety and wellbeing of Victorians. It guides organisations prescribed under regulations that have responsibilities in assessing and managing family violence risk. |
| **Mainstream service** | In these program requirements, refers to any service supporting a victim survivor with disability that is not a specialist family violence service.A person working for such a service is called a mainstream professional. |
| **Secondary consultation** | In these program requirements, a secondary consultation occurs when a service supporting a victim survivor seeks information, guidance, support or collaboration from another professional or service.For more, visit: Victorian Government Practice Guide – Responsibility 5, including for comprehensive family violence assessment and management response.[[10]](#footnote-11) |
| **Victim survivor** | Refers to people of any age and gender identity who are experiencing or who have experienced family violence. All family members are in scope for the definition of victim survivor. These include infants, children and young people through to older people and extended family members affected by the violence.  |
| **Victim survivor with disability** | This includes child and young adult victim survivors with disability who are experiencing family violence. It also covers those escaping family violence with or without their parent.  |
| **Warm referral** | Involves contacting a service for or with the victim survivor, rather than just providing contact information and recommending that they contact the service themselves. For example, Safe Steps and a victim survivor could make the phone call to the service together to make introductions and share information. |

1. Research shows that, on average, victim survivors with disability experience abuse one year longer than non-disabled survivors before seeking help. Refer to: *Disability and violence – in focus: crime and justice statistics, disability and violence* – April 2021. [↑](#footnote-ref-2)
2. The 2016 Personal Safety Survey found that living with disability or a long-term health condition raised the likelihood of experiencing various types of violence for women but not for men. This included violence by a cohabiting partner (physical and/or sexual) and emotional abuse by a cohabiting partner. However, having an intellectual/psychological disability raises the risk of violence for both men and women compared with those with a physical disability. Men with an intellectual/psychological disability were twice as likely than men with a physical disability to experience violence (12 per cent compared with 5.8 per cent). For women with an intellectual disability, the figure was almost triple (15 per cent compared with 5.2 per cent). [↑](#footnote-ref-3)
3. For more on the drivers of family violence, refer to [*The gendered drivers*](https://safeandequal.org.au/working-in-family-violence/prevention/evidence-base/gendered-drivers/) https://safeandequal.org.au/working-in-family-violence/prevention/evidence-base/gendered-drivers/ [↑](#footnote-ref-4)
4. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability: *Research report – nature and extent of violence, abuse, neglect and exploitation against people with disability in Australia 2021*. [↑](#footnote-ref-5)
5. For more, refer to: *Family violence crisis responses: Roles and responsibilities in providing*

*emergency accommodation* [↑](#footnote-ref-6)
6. A continuum of support is provided for victim survivors that includes meeting needs outside of a crisis response. For example, we recognise that a victim survivor may be out of immediate crisis danger but still be at risk of returning to a violent relationship due to lack of support or accommodation options. The DFVCRI secondary consultation service (refer to the ‘Secondary consultation’ section) can help service providers and professionals to navigate the range of services and brokerage available to victim survivors living with disability. [↑](#footnote-ref-7)
7. Note: Safe Steps also plays a broader role beyond delivering the DFVCRI. Safe Steps leads specialist family violence crisis and case management support for more extended support periods, as required. [↑](#footnote-ref-8)
8. Where a mainstream professional worker is the main contact point, Safe Steps will make a warm referral to connect the victim survivor to specialist family violence services. [↑](#footnote-ref-9)
9. As determined by the *Family Violence Protection Act* (2008). [↑](#footnote-ref-10)
10. Refer to [Victorian Government Practice Guide – Responsibility 5: Secondary Consultation and Referral](https://www.vic.gov.au/sites/default/files/2020-05/PG%20Responsibility%205.pdf) https://www.vic.gov.au/sites/default/files/2020-05/PG%20Responsibility%205.pdf. [↑](#footnote-ref-11)