

Your Ref:
Our Ref: 906

31 May 2022

The Hon Jacquie Petrusma, MP
Minister for the Prevention of Family Violence
By email: fsvap@communities.tas.gov.au

Dear Minister,

Re: Third Family and Sexual Violence Action Plan

Thank you for the opportunity to provide feedback to inform the third Family and Sexual Violence Action Plan (Action Plan).

My feedback focuses on children and young people as victim-survivors in their own right and identifies four key areas for consideration in developing the third Action Plan. Noting that consultation on the Action Plan is open until February 2023, this feedback is in summary form and is not intended to be exhaustive. It draws on insights detailed in my recent [Respectful Relations and Consent Education Report – I think adults play a big role in this](#), and given alignment of intent, shares content with my recent [submission](#) providing feedback on the National Plan to End Violence Against Women and Children 2022-32.

As you are aware, my role as Tasmania's Commissioner for Children and Young People is to advocate for the rights and wellbeing of all children and young people in Tasmania. The *Commissioner for Children and Young People Act 2016* (CCYP Act) sets out the functions of the Commissioner which include influencing policy development in areas relating to children and young people. This submission focuses on recommended priority actions to prevent and respond to children and young people experiencing family and sexual violence and to provide them with the access necessary to inform and influence decision makers. It is my recommendation that the Action Plan articulates differentiated preventative and support actions specific to children and young people or represents these through a companion action plan that treats children and young people as a population subset. Further, the definition of victim-survivors merits further discussion in developing the Action Plan given the definition of 'family violence' currently adopted in Tasmania is limited in scope to behaviour by a person against their spouse, partner or ex-partner.

Recognising children and young people in their own right

Children and young people who experience violence have their own unique experiences of that violence, including individual coping strategies, thoughts and perspectives, as well as the need for services and supports tailored to their level of understanding, age, stage of



development, and individual circumstances.¹ I therefore welcome the acknowledgement of children and young people as victim-survivors of family and sexual violence in their own right in the public submission invitation documentation. It is my recommendation that the Action Plan recognises children's unique experiences of violence and the effect that those experiences can have on their wellbeing and development through the inclusion of comprehensive information and data regarding the prevalence and experience of violence by children and young people.

Further, the Action Plan should include explicit reference to the importance of drawing on the lived experience of children and young people in the design and implementation of measures to prevent and respond to violence. I welcomed the commitment in the context of targeted stakeholder consultation to include a focus on how children and young people may be 'heard from and worked with during the life of the Action Plan'. Given my ongoing role in and commitment to ensuring the children and young people of Tasmania have channels through which to participate in the design, development and delivery of policies and programs that impact their lives, I look forward to further discussing possible trauma informed and child-centred mechanisms to facilitate direct contribution to the third Action Plan by children and young people during the life of the plan.

A strengthened approach to primary prevention

When consulting with children and young people across Tasmania, I regularly hear that they want to learn more about gender, sexual diversity and gender equality as well as respectful relationships and consent education and they want to have a say in the design and delivery of these programs.

By providing relevant, contemporary and developmentally appropriate education programs on consent and respectful and equal relationships for children and young people, we can far better prevent and address disrespectful attitudes that can lead to gendered violence and discrimination. I would urge focus in the next Action Plan on the importance of these programs for children and young people as a primary prevention focus, including through a commitment to co-designing such programs with children and young people and taking account of the extensive evidence for the importance of whole-of-population prevention initiatives including whole-of-school community approaches to respectful relationships education.

During 2021, as part of the CCYP Ambassador Program, I listened to what children and young people had to say about what it means to feel accepted, to feel they belong, and to feel safe in their schools and communities today. Importantly, I also listened to young people's views on respectful relationships and consent education in Tasmanian schools and, in early 2022, explored in more detail their views about what needs to change and how these changes could occur. The views of children and young people as conveyed in "*I think adults play a big role in this*" provide a foundation upon which to build ongoing dialogue between decision-makers and Tasmanian children and young people in the design and delivery of appropriate policy and programs to address issues that impact their lives while also, importantly, meeting their needs.

¹ Commissioner for Children and Young People (Tas), 2016, [Children and Young People's Unique Experiences of Family Violence](#).



Inter-relationship with other frameworks and strategies

The current Action Plan acknowledges related national and state policies and commits to supporting existing programs to address family and sexual violence. However, it is recommended the third Action Plan clarifies and articulates its inter-relationship with existing national and state-level frameworks and strategies that contribute to preventing and responding to family and sexual violence against children and young people and any emerging policy initiatives.

In particular, a strengthened and more integrated approach to better inform strategies to prevent and respond to harmful sexual behaviours should be a priority to improve the safety and wellbeing of children and young people. I have previously noted the clear need for the development of an overarching policy framework in which to embed our service system response to harmful sexual behaviours and that consideration should be given to whether there is a need for legislative reform to underpin and support that policy framework.

Developmentally appropriate responses to violence in the context of intimate partner relationships between young teenagers also warrant further consideration to ensure the unique needs of these young people are met. It is anticipated that findings of [current Anglicare Tasmania-led research](#) examining the experiences of young people who have been subject to intimate partner abuse will prove a valuable, relevant source of data in developing the Action Plan.

Measures, targets and outcomes

Finally, to better understand the changing experiences of children and young people and our progress to prevent and respond to violence affecting them, the Action Plan should include a commitment to child-specific measures, targets and outcomes. As prevention activities will necessitate a focus on educating and shifting the knowledge and attitudes of children and young people towards gender equality and the gendered drivers of violence, it is imperative that the targets also capture changes in knowledge and attitudes of children and young people over time. Children and young people should be consulted in the development of targets to capture what they think are important measures when it comes to ending violence against women and children.

Thank you again for the opportunity to provide comment to inform the third Action Plan. I would be pleased to discuss my contribution in further detail should this be of assistance.

Yours sincerely

Leanne McLean

Commissioner for Children and Young People

cc *The Hon Roger Jaensch MP, Minister for Education, Children, and Youth*