

WOMEN'S SAFETY NSW

Feedback on the Proposed Changes to the Victims Services Support Scheme

27 May 2020

Prepared by:

Hayley Foster, Chief Executive Officer

Amani Mahmound, Research Assistant

Chelsea Boyle, Research Assistant

Keeley Smith, Research Assistant

Table of Contents

1.	INTRODUCTION.....	3
1.1.	ABOUT.....	3
1.2.	METHODOLOGY	3
2.	KEY ISSUES.....	3
2.1.	INFORMATION REGARDING IMMEDIATE NEEDS SUPPORT PAYMENTS (INSP)	3
2.1.1.	FREQUENCY OF CLIENTS REQUIRING ASSISTANCE	3
2.1.2.	AVERAGE PROCESSING TIME	4
2.1.3.	ISSUES WITH DOCUMENTATION	4
2.1.4.	ISSUES WITH CLIENTS PROVIDING GOVERNMENT ID FOR THE PURPOSE OF VICTIMS SERVICES	5
2.1.5.	OUR POSITION:	5
2.2.	VICTIMS SERVICES COUNSELLING (VSC).....	5
2.2.1.	ASSISTANCE OF APPLICATION FOR VSC	5
2.2.1.1.	TIME DELAY	6
2.2.1.2.	ACCESS TO VSC	6
2.2.2.	PROPOSAL: VICTIMS SELECTING OWN COUNSELLORS?	7
2.2.3.	PROPOSAL: A CENTRAL UPDATED LIST OF COUNSELLORS?.....	8
2.2.4.	WOMEN'S LEGAL SERVICE NSW PROPOSAL - PROVIDING THE OPTION.....	9
2.2.5.	OUR POSITION	9
2.3.	RECOGNITION PAYMENTS AND PAYMENTS FOR ECONOMIC LOSS.....	10
2.3.1.	FREQUENCY OF CLIENT ASSISTANCE WITH APPLICATION FOR RECOGNITION PAYMENTS AND PAYMENTS FOR ECONOMIC FINANCIAL LOSS.....	10
2.3.2.	PROCESSING TIME FOR VICTIMS SERVICES RECOGNITION PAYMENTS AND PAYMENTS FOR ECONOMIC/FINANCIAL LOSS TO BE APPROVED	11
2.3.3.	BARRIERS TO CLIENTS ACCESSING RECOGNITION PAYMENTS AND PAYMENTS FOR ECONOMIC LOSS	11
2.3.4.	PROPOSAL: REQUIRE APPLICATIONS FOR RECOGNITION PAYMENTS AND ECONOMIC LOSS TO BE ACCOMPANIED BY RELEVANT DOCUMENTARY EVIDENCE AT THE TIME OF LODGEMENT?	12
2.3.5.	WOMEN'S LEGAL SERVICE NSW PROPOSAL: PROVIDING THE OPTION.....	13
2.3.6.	OUR POSITION	13
2.4.	CONSOLIDATION OF VICTIM SERVICES NSW PHONE LINES.....	14
2.4.1.	OUR POSITION	14
2.5.	OTHER FEEDBACK	14
3.	CONCLUDING COMMENTS.....	15

1. Introduction

1.1. About

Women's Safety NSW is a peak representative body for women's specialist domestic and family violence services in NSW – including all Women's Domestic Violence Court Advocacy Services (WDVCAS) working in 114 Local Courts across NSW and in the Family Law Courts and coordinating the NSW Government's Victim Safety Response – Safer Pathway. We advocate on behalf of our workers for systemic reform to increase women's safety, justice and wellbeing in the context of domestic and family violence.

The NSW Government has proposed reforms to the NSW Victims Support Scheme to improve their services for victims of crime. The proposed advances include consolidation of service phone numbers, client's free choice to counsellor and a new application form. Whilst we appreciate the intention of proposed reforms, we fear some of the changes may deny victims of domestic and family violence access to the support and services to which they are entitled. The implementation of these proposed reforms has been paused whilst the government consults with stakeholders on their likely impact. We thank the Victims Services Commissioner for the opportunity to provide feedback on these and look forward to further discussions as to how we can work together to achieve the best possible outcomes in the interests of victims of domestic and family violence.

1.2. Methodology

To address concerns surrounding the proposed changes to the NSW Victims Support Scheme, Women's Safety NSW conducted an online survey with frontline workers, coordinators and service providers. The survey was sent out and completed by a diverse range of 48 workers state-wide. **48.89%** of those are based in regional locations, **20%** in inner metropolitan areas, **26.7%** in outer metropolitan areas and **6.67%** are in rural areas. The survey asked for feedback and opinions on the proposed changes to Victims Services with respect to applications for counselling and recognition payments.

2. Key issues

2.1. Information regarding Immediate Needs Support Payments (INSP)

2.1.1. Frequency of clients requiring assistance

From the survey it is clear many participants provide assistance to their clients in applying for the Immediate Needs Support Payments (INSP).

- **15.6%** of respondents indicated that they assist 80-100% of their clients with applications for INSPs.
- **22.2%** of respondents indicated that they assist 60-80% of their clients with applications.
- **17.78%** of respondents indicated that they assist 40-60% of their clients with applications.
- **28.89%** respondents indicated that they assist 20-40% of their clients with applications.
- **15.56%** of respondents indicated that they assist 0-20% of their clients with applications.

2.1.2. Average Processing Time

From the participants it is clear that it can be a timely process for INSPs to be approved with **63.64%** indicating that the average processing time is less than 14 days. **27.7%** however indicated that the average processing time was more than 14 days. One respondent stated that it *'can be anywhere from two days to 28 days'*. Whilst another indicated that she has had *'clients waiting for up to five months'*.

- 6.82% of respondents indicated that it took 1-2 days
- 9.09% of respondents indicated that it took 2-5 days
- 18.18% of respondents indicated that it took 5-10 days
- 29.9% of respondents indicated that it took 10-14 days
- 27.7% of respondents indicated that it took more than 14 days

2.1.3. Issues with documentation

Respondents indicated:

- **63.63%** indicated that 0-20% of their clients INSP applications are rejected because Victims Services were either unable to open documents or had problems with lodging documents
- **18.18%** indicated that 20-40% of their clients INSP applications are rejected because Victims Services were either unable to open documents or had problems with lodging documents
- **6.82%** indicated that 40-60% of their clients INSP applications are rejected because Victims Services were either unable to open documents or had problems with lodging documents

One participant stated that clients struggle when they *'don't have access to the internet or a scanner at home'* as it means their documents either *'don't go through or are unreadable'*. Another

respondent indicated that their clients' INSP applications are usually rejected because there is either *'not enough evidence or if the client hasn't signed'*.

2.1.4. Issues with clients providing government ID for the purpose of Victims Services

Respondents indicated:

- **63.64%** reported that 0-20% of their clients had difficulty in providing government ID for the purpose of Victims Services
- **20.45%** reported that 20-40% of their clients had difficulty in providing government ID for the purpose of Victims Services
- **2.27%** reported that 40-60% of their clients had difficulty in providing government ID for the purpose of Victims Services
- **9.09%** reported that 60-80% of their clients had difficulty in providing government ID for the purpose of Victims Services

One respondent stated that women struggle with providing drivers licenses when they *'are homeless or have unstable accommodation'*. Another has found that *'clients who have left their ID at previous accommodation have difficulty in providing ID for reapplying'*. It is also apparent that COVID-19 has created more issues in providing ID, with one participant stating that in the current climate it is *'difficult to apply for ID due to COVID-19 and the disruption of the administrative processes.'*

2.1.5. Our Position:

At Women's Safety NSW, we see the Immediate Needs Support Payments as a welcome reform. It appears to be operating in a highly effective manner, providing critical assistance to victims of domestic and family violence in a fairly timely way. It does not fill the services sector gap of brokerage funding whereby victims of domestic and family violence need "immediate" access to funds in order to achieve safety, but it does fill an essential gap in providing "timely" material support.

2.2. Victims Services Counselling (VSC)

2.2.1. Assistance of application for VSC

A large proportion of those surveyed indicated that they assist their clients with applications for VSC.

- **25.53%** reported that they assisted 80-100% of clients with applications for VSC

- **23.40%** reported that they assisted 60-80% of clients with applications for VSC
- **29.79%** of respondents reported that they assisted 40-60% of their clients with applications for VSC
- **8.51%** reported that they assisted 20-40% of clients with applications for VSC
- **12.77%** reported that they assisted 0-20% of clients with applications for VSC

2.2.1.1. Time delay

The data indicates that there are several issues with regards to delays with processing VSC applications. With **30.43%** of participants indicating that it took more than 14 days for BSC applications to be approved.

More specifically:

- **30.43%** reported that it took more than 14 days for VSC applications to be approved
- **26.09%** reported that it took 10-14 days for approval
- **13.04%** reported it took 5-10 days for approval
- **19.57%** reported it took 2-5 days for approval
- **8.70%** reported that it took 1-2 days for approval

One respondent indicated that despite the averaging processing time decreasing recently they have still encountered issues with *'clients still being allocated counsellors who are not taking new clients and therefore we have to assist with calling around to see what counsellors are available as Victim's Services record of counsellor's capacity is obviously not correct.'* Another respondent stated that *'various applications have been lost and taken several weeks to get approved'*.

2.2.1.2. Access to VSC

Access to services can be a significant obstacle when attempting to access essential domestic and family violence services. There are several issues that surround access to VSC that were identified by respondents. An alarming **68.83%** of respondents outlined that it was either 'difficult' or 'very difficult' to access trauma and violence informed VSC for clients without significant delay. With only **2.13%** of participants indicating that they found it 'very easy' to access trauma and violence informed VSC for their clients without significant delay.

Further information given by respondents provides valuable insight into the several difficulties surrounding access to VSC. It was identified that there are extensive wait lists, some so long that clients may be placed on the list for months before they are able to see a counsellor. It was also revealed that Victims Services appoints victims to counsellors who are not taking on new clients.

It was also indicated that there is an overall lack of counsellors, particularly in remote areas. One regional WDVCAS worker stated that *'there are not many counsellors available in remote areas and often the ones assigned do not answer their phones or advise clients that they are not accepting new clients.'* Another regional WDVCAS worker indicated that *'at busiest times, no one is available to take on new clients in our area at all'*. It was also revealed that clients in remote areas *'are often required to travel distances but lack the resources (money, petrol, time) to do this'*.

Despite these traditionally long waiting times for counsellors in rural areas, respondents did indicate that this has actually improved since COVID-19 due to the presence of phone-counselling. This has allowed those clients in remote and regional areas, where there are few counsellors, to be assigned to counsellors who are based in areas where there are many counsellors.

Other issues identified include:

- Clients experiencing significant delays even once a counsellor is finally allocated.
- If there are dual claims going through i.e. financial assistance and counselling, then the counselling claim is not given priority.
- Counsellors do not have their specialised area noted.
- Clients contacting counsellors leads to longer delays as there are issues with not having enough phone credit or data to make numerous phone calls.

2.2.2. Proposal: Victims selecting own counsellors?

Respondents were asked if they supported a proposed reform whereby clients who are approved for counselling would be able to choose a counsellor that best suits them from the list available from the Victims Services website (as opposed to being allocated to a specific counsellor by Victims Services).

- 65.91% supported this
- 31.82% did not support this

Of those that supported this initiative they highlighted how this initiative would provide victims with autonomy in that they have the power to pick their own counsellor and are able to make decisions around their support. Being able to choose their own counsellor could also increase a client-centred approach. A regional WDVCS worker stated that it would allow *'clients to make a more informed choice about their counsellor by having information about them'*.

The views of those that did not support the idea is well summarised by the following statement:

"...as many of the women we work with are overwhelmed, in survival mode and often juggling their own and children's safety, with their children's wellbeing and relocation it can be difficult for women to prioritise their own needs. Adding steps like finding your own counsellor can add barriers to self-care. However, I do acknowledge the increased power and control a woman has over her life when being able to make informed choices around who she shares her story with and seeks therapeutic support from." - Inner Metropolitan WDVCS worker

Other respondents shared similar views:

- *"I think this is an unnecessary complication to the process. I think that clients from the beginning should be able to ask Victims Services to allocate them to a counsellor, and that it shouldn't be an additional step. Clients are usually already facing a lot, and an additional step might be the difference of them being able to access the support or not"* - Inner Metropolitan WDVCS worker
- *"I feel the majority of my clients would be deterred by this process, particularly if there seemed to be no counsellors available to help them. I worry they might feel overwhelmed"* - Regional WDVCS worker

2.2.3. Proposal: A Central Updated List of Counsellors?

When asked whether they supported the idea of an updated list of all available counsellors on the Victims Services website with detailed information about counsellors including their qualifications, experience, specialisation and availability, the vast majority of respondents (**85.11%**) indicated that they were supportive. Respondents relayed that it would be highly beneficial to know availability. Indeed, this was cited to be one of the key issues with regards to access. It would also allow women to have an informed choice with regards to choosing a counsellor. Respondents noted that it would have to be available in different languages to ensure accessibility.

Those who were not in favour of this proposed change cited that it would be highly necessary for this list to be updated frequently and they doubted that would occur. Further, that it would not be accessible to those who do not have a computer or who are not computer literate.

Respondents were asked, if there was a website of a current list of available counsellors, which categories would be useful to have for clients or support workers to select the most appropriate counsellor for web-based or face-to-face counselling? In response:

- **95.74%** agreed that adult domestic, family and sexual violence specialists should be a category
- **87.23%** agreed that child and youth domestic, family and sexual violence specialists should be a category
- **80.85%** agreed that Aboriginal and Torres Strait Islander specialists should be a category
- **80.85%** agreed that multicultural specialists should be a category
- **74.47%** agreed that disability specialists should be a category
- **72.34%** agreed that LGBTIQ+ specialists should be a category

Other categories suggested by respondents included the following:

- Multilingual counsellors
- Financial counsellors
- Gender

2.2.4. Women's Legal Service NSW Proposal - Providing the Option

Women's Legal Service NSW have proposed a solution to increase the availability of Victims Services counsellors (and reducing waiting lists) whilst still ensuring accessibility for clients who may find it difficult to proactively select a Victims Services counsellor from the list. They have proposed that the application form should include the option on whether victims choose their own counsellor or have one allocated to them. **All (100%)** the respondents in our survey supported this proposal, believing that it would be beneficial as *'it gives the victim a choice'*.

2.2.5. Our Position

The survey respondents identified primary issues with regards to victims of crime having access to Victims Services Counselling. Participants revealed a major issue to be the current lack of available counsellors and the difficulties that victims have in accessing trauma and violence informed counsellors. However, the recent introduction of phone-counselling as a result of COVID-19, has radically increased accessibility to specialist trauma and culturally specific counsellors for victims of

domestic and family violence in regional, rural and remote areas. Despite this, we do still have concerns with regards to clients' access to the internet, technology and equipment and how their potential lack of access can exclude them from partaking in these services.

We acknowledge that the initiative of Victim's Services NSW of having all victims choose their own counsellor has a beneficial component, in that it provides victims with a choice. However, it is still crucial that there is a safety net for those victims for whom the additional step of having to find their own counsellor would prove a barrier to service access. Women's Safety NSW agrees with the statement made by Community Legal Centres NSW open letter that 'every barrier put in a victim's-survivor's way will deter them from accessing the support they are entitled to and need'. There is a risk that those victims who do not want to go through the process of choosing their own counsellor, or are not able to whilst experiencing trauma, will just give up.

Women's Safety NSW therefore supports the solution proposed by Women's Legal Services NSW that victims should be given an option as to whether they want to go through the process of choosing their own counsellor or if they would want Victim's Services NSW to allocate a counsellor to them. This gives victims the autonomy to make the decision, as it is ultimately their choice.

Women's Safety NSW also supports the idea of an updated list of all available counsellors on the Victim's Services NSW website with detailed information about counsellors including their qualifications, experience, specialisation and availability. This would allow victims to make an informed choice when choosing a counsellor, if they choose to do so.

2.3. Recognition Payments and Payments for Economic Loss

2.3.1. Frequency of client assistance with application for Recognition Payments and Payments for Economic Financial Loss

The current survey found that frontline workers only assist a proportion of their clients with application for Recognition Payments and Payments for Economic Financial loss:

- **37.78%** reported that they assisted 0-20% of their clients with applications for Recognition Payments of Payments for Economic/Financial Loss
- **22.22%** reported that they assisted 20-40% of their clients with applications for Recognition Payments of Payments for Economic/Financial Loss

- **13.33%** reported that they assisted 40-60% of their clients with applications for Recognition Payments of Payments for Economic/Financial Loss
- **11.11%** reported that they assisted 60-80% of their clients with applications for Recognition Payments of Payments for Economic/Financial Loss
- **13.33%** reported that they assisted 80-100% of their clients with applications for Recognition Payments of Payments for Economic/Financial Loss

Referrals are also made to other services, such as community legal services to assist with this process: *“we often refer through to a VS specialising solicitor that offers support in our area”* - Regional WDV CAS worker

2.3.2. Processing time for Victims Services Recognition Payments and Payments for Economic/Financial loss to be approved

Respondents indicated:

- **47.62%** of participants identified that it takes a ‘greater than 12 months’ for applications to be processed
- **30.95%** of participants identified that it takes ‘6-12 months’ for applications to be processed
- **9.52%** of participants identified that it takes ‘3-6 months’ for applications to be processed
- **2.38%** of participants identified that it takes ‘1-3 months’ for applications to be processed
- **2.38%** of participants identified that it takes ‘1-4 weeks’ for applications to be processed

One regional WDV CAS worker highlighted the lengthy processing time, stating that: *“I have never seen a recognition payment approved, they are ‘still processing’. I’ve been in my role for 2 years”*

2.3.3. Barriers to clients accessing Recognition Payments and Payments for Economic Loss

Barriers for clients accessing Recognition Payments and Payments for Economic Loss were surveyed in the current study. Key barriers include the following:

- **88.64%** reported that their clients not having the full documentation available at the time of the incident and not knowing how to follow up down the track.
- **81.82%** reported that clients are in too much trauma at the time of the incident to think about putting in an application and then not knowing or remembering to follow up on their entitlements down the track.
- **75%** reported that their clients are being re-traumatized by having to seek out and obtain records/documentation of their own traumatic injuries.
- **72.73%** reported that their clients do not have enough case management support to obtain the full documentation needed to complete their claim.
- **59.09%** reported that their clients are not able access the required 'proof' of injury despite requesting the information from health practitioners/counsellors.
- **47.73%** reported that their clients are not claiming in time (2 years - 10 years from date of injury, depending on injury type).

Other barriers identified by respondents include:

- Clients being overwhelmed and giving up.
- Difficulty in understanding the letters sent to clients on decisions and what is needed or reasons that they are unable to proceed with the claim.
- Clients not having access to the internet, a computer or scanner.
- Clients being fearful of restitution and their perpetrator retaliating.
- Language and literacy issues.
- Homelessness and relocation.
- There not being clear pathways for how to go about making the request.

2.3.4. Proposal: Require applications for recognition payments and economic loss to be accompanied by relevant documentary evidence at the time of lodgement?

Proposed changes by Victims Services NSW included the requirement for applications for recognition payments and economic loss to be accompanied by relevant documentary evidence at the time of lodgement. This would entail a medical/counselling report to be included as well as a Government ID such as Medicare card or driver's license. Further, Victims Services NSW are to continue obtaining Police reports as required. Of the participants surveyed, **52.27%** identified that they **supported this change**, with the remaining **47.73% opposed to it**.

Respondents who were opposed to this change believed it not to be a trauma-informed approach, noting that requiring the victim to gather this evidence could potentially re-traumatise them.

- *“It places the onus on the victim to gather evidence which is incredibly traumatic and overwhelming. Sometimes there are barriers to accessing certain documents (e.g. medical reports - particularly for mental health-based admissions) as well as having to engage with systems that haven’t always been trauma informed, supportive or have retraumatized” - Inner Metropolitan WDVCS worker*
- *“I believe it should be an option. But i think having to track down medical records and relive through that trauma will be a massive barrier for clients moving forward. I also think that following trauma there are so many things expected of an individual that it will not be prioritized by the client and they will miss out - which i do not believe to be fair.” - Regional Staying Home Leaving Violence worker*
- *“I feel this is another barrier for clients to claim through VS. It could all go in the too hard basket - I feel it’s more client centred to be able to add to your claim if not all documentation is available to begin with” - WDVCS Outer Metropolitan Worker*
- *“I think the point of our assisting them with the applications is that the burden is somewhat lifted chasing down their own evidence/quotes is hard enough without adding medical reports” - Regional WDVCS*

2.3.5. Women’s Legal Service NSW Proposal: Providing the Option

An alternative solution has been proposed by Women’s Legal Service NSW for effective processing of recognition payments/economic and financial loss payments. This proposal includes streamlining the pathway where claims will be processed efficiently if accompanied by all appropriate documentation, whilst continuing to include a supported pathway where claims may have been lodged with only partial documentation and Victims Services NSW assists the client in obtaining the required additional information. Of the frontline workers surveyed, a positive **93.18%** identified that they supported this solution.

2.3.6. Our Position

It is our position the Recognition Payments and Payments for Economic Loss are an essential service for victims of domestic and family violence. However, there are significant issues with proposed recommendations from Victims Services NSW with the information given up front, i.e. trauma, money, extra steps to ensure that are supported in every way. No recommendation has been made by Victims

Services NSW to date to resolve these issues. The substantive majority of Women's Safety NSW's members support Women's Legal Service NSW's proposal of both promoting a streamlined pathway where claims may be processed more efficiently with documentary evidence provided upfront, whilst also continuing to provide a safety net in a supported option whereby applications may be lodged without all the documentary evidence and Victims Services NSW is able to support clients in obtaining the necessary documentary to complete their claim in due course.

2.4. Consolidation of Victim Services NSW phone lines

88.64% of surveyed participants reported that they were in support of the proposed consolidation of Victim Service NSW phone lines from 9 to 2. However, **11.36%** of respondents expressed concern as to an increased in wait times, with some saying:

- *"It seems okay but what will the delays be. Will the phones be sufficiently staff to take the calls without delays"* - Regional/Rural WDVCS worker
- *"Overall yes, however, it's hard enough to get through currently, I'm concerned this could add extra waiting times on top of an already stretched service"* - Outer Metropolitan WDVCS worker
- *"It is really hard for victims to get through at the moment, some can wait up to 40 minutes to speak to someone to change their counsellor, will these changes increase wait time"* - Outer Metropolitan WDVCS worker
- *"We already wait for a long time. This could make it longer"* - Outer Metropolitan WDVCS

2.4.1. Our Position

Women's Safety NSW is supportive of a simplification of Victim Service NSW phone lines provided that this does not result in a reduction in overall accessibility of access to telephone support due to resource reallocations elsewhere.

2.5. Other feedback

In addition to the specific questions asked of Women's Safety NSW members, respondents were asked if they had any further feedback for Victims Services NSW at this time. These are some of the responses:

- *"Has the impact on other NFP support services been analysed. We do have the time to move into the role of victim services"* - Rural WDVCS worker
- *"I believe a client would benefit from a follow up email / text or mail advising of processing stage... just a thought"* - Inner Metropolitan WDVCS worker

- *“Concerns for vulnerable clients with limited service / casework support in collecting evidence and added workload on DV and other caseworkers to help navigate this.” - Outer Metropolitan WDVCS worker*
- *“Victims of domestic violence may give up applying as there aren't caseworkers to help with the applications” - Inner Metropolitan WDVCS worker*
- *“Training for Victims Services staff to better understand domestic violence. So often we receive rejections - particularly to INSP applications 1) for petty reasons - I received one the other day that stated a question had not been completed. The first part of that question was 'do you intend to relocate? The client said NO. The question missed asked why the clients intended to relocate. This application was rejected and required submission that pushed the application back a further 10 days (20 days in total) due to a lack of DV knowledge. On a number of occasions, it is stated that DV has to be physical to be approved. This is not in the Act that governs Victims Services. It is a lack of understanding about the types of violence within DV.” - Regional Staying Home Leaving Violence worker*
- *“A better process for Victims Services to be aware of counsellors currently available. Counsellors are consistently allocated but then state they don't have capacity, despite clients calling to make an appointment right away” - Regional WDVCS worker*
- *“That victim services have a consistent and productive process in the best interest of victims and that they do have long wait times for victims. Also don't complicate the process for victims who are applying for applications on their own. They are under enough stress and trauma as it is.” - Outer Metropolitan WDVCS worker*
- *“The immediate needs support package has been invaluable to my clients - fantastic idea” - Regional WDVCS worker*

3. Concluding comments

Women's Safety NSW appreciates the opportunity to provide feedback on the proposed reforms to the NSW Victims Support Scheme. The decision to pause implementation of the reforms in order for this consultation to take place is welcomed, as is the revised proposal to include the acceptance of Victims Services applications that do not have all necessary evidence required at time of lodgement. This vital improvement will ensure that all applicants have a fair chance at submitting their application within the time limit required.

There have been some significant recent achievements within Victims Services NSW, not least the implementation of the INSP. Furthermore, there are many positive aspects to the reform proposal which Women's Safety NSW believe will have significant benefits to victims of domestic and family violence in their safety

and recovery. Streamlining the Victims Services phone lines and upgrading the website with timely and relevant information about counsellors are examples of these.

However, there are key areas within the proposed reforms that remain of concern. We believe that, if implemented in their current form, a number of aspects of these reforms will have the effect of denying victims of domestic and family violence access to the support they, as survivors, are entitled to. Specifically, the requirement to provide all documentary evidence upfront in order to submit a claim, and to proactively select one's own Victims Services counsellor will place roadblocks in the way of many victims accessing the essential supports they need to assist them in their recovery.

Moving forward, we believe that changes to the NSW Victim Support Scheme should be driven by victims of crime themselves so ensure an inclusive, cohesive system.

We thank you for your consideration of our feedback and look forward to further discussions on progressing the reforms needed to ensure the best possible outcomes for victims of crime in NSW.