



THE LAW SOCIETY
OF NEW SOUTH WALES

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13 August 2014

Committee Secretary
Senate Finance and Public Administration References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

By email: fpa.sen@aph.gov.au

Dear Committee Secretary,

Parliamentary Inquiry into Domestic Violence in Australia

Thank you for the opportunity to comment on the Inquiry into Domestic Violence in Australia.

I write to you on behalf of the Family Issues Committee ("FIC"), the Human Rights Committee ("HRC") and the Indigenous Issues Committees ("IIC") of the Law Society of NSW (together referred to as "the Committees").

The FIC assists the Law Society in the area of family law, particularly in respect of advocacy about the needs and family law rights and duties of people in NSW. The HRC is responsible for considering and monitoring Australia's obligations under international law in respect of human rights; considering reform proposals and draft legislation with respect to issues of human rights; and advising the Law Society accordingly. The IIC represents the Law Society on Indigenous issues as they relate to the legal needs of Aboriginal people in NSW. All Committees include experts drawn from the Law Society's membership, including judicial members, and members whose work is directly related to the provision of legal and therapeutic services in domestic violence matters.

1. General observations

1.1. Public policy principles and international obligations

The HRC acknowledges that men, women and children are capable of being victims of domestic violence, but this submission focuses on violence against women because of the prevalence of such violence.

The HRC notes that women have a right to be free from violence. This right is upheld in the *Convention on the Elimination of All Forms of Discrimination Against Women* ("CEDAW") which was ratified by Australia in 1983; and the UN Declaration on the Elimination of Violence against Women ("Declaration").

Article 1 of CEDAW defines discrimination against women. *General Recommendation 19 of the UN Committee on the Elimination of All Forms of Discrimination Against Women* (“*General Recommendation 19*”) states that gender-based violence is violence that is directed against a woman because she is a woman, or if such violence affects women disproportionately and amounts to discrimination. This includes acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty.

Violence against women can impair or nullify the enjoyment by women of other human rights and fundamental freedoms. Discrimination within the meaning of Article 1 of CEDAW is clearly expressed. *General Recommendation 19* notes that these rights and freedoms include:

- (a) The right to life;
- (b) The right not to be subject to torture or to cruel, inhuman or degrading treatment or punishment;
- (c) The right to equal protection according to humanitarian norms in time of international or internal armed conflict;
- (d) The right to liberty and security of person;
- (e) The right to equal protection under the law;
- (f) The right to equality in the family;
- (g) The right to the highest standard attainable of physical and mental health;
- (h) The right to just and favourable conditions of work.

The HRC notes Nation States may be responsible for private acts of violence. *General Recommendation 19* states that:

Under general international law and specific human rights covenants, States may also be responsible for private acts if they fail to act with due diligence to prevent violations of rights or to investigate and punish acts of violence, and for providing compensation.

States are required under Article 2 of CEDAW to pursue by all appropriate means and without delay a policy of eliminating discrimination against women, including to adopt appropriate constitutional, legislative and policy measures to protect the ability of women to equal enjoyment of their rights.

Domestic and gender-based violence can equally affect children, whether directly or indirectly.

The *Convention on the Rights of the Child 1990* (“*CRC*”) seeks to protect children, promote their well-being and to ensure that they have an appropriate place in society. The *CRC* recognises the civil, cultural, economic, political and social rights of children and was ratified by Australia in 1991. Australia’s obligations under the *CRC* are implemented under a range of Commonwealth, state and territory statutes.

The Committees are of the view that Australia’s international obligations under CEDAW and *CRC* must be considered and reflected in any examination of the adequacy of policy responses to domestic violence and its effect on policy decisions on victims of domestic violence.

The Committees refer specifically to Articles 9 and 19 of the CRC which state that:

Article 9

1. States Parties shall ensure that a child shall not be separated from his or her parents against their will, except when competent authorities subject to judicial review determine, in accordance with applicable law and procedures, that such separation is necessary for the best interests of the child. Such determination may be necessary in a particular case such as one involving abuse or neglect of the child by the parents, or one where the parents are living separately and a decision must be made as to the child's place of residence.

...

3. States Parties shall respect the right of the child who is separated from one or both parents to maintain personal relations and direct contact with both parents on a regular basis, except if it is contrary to the child's best interests.

Article 19

1. States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

The Committees strongly support the proposition that Australia's international obligations under CEDAW and CRC must form the basis for any future reform or the introduction of future legislation.

1.2. Insights from practice

The IIC submits that in practice, what is lacking is a mature, strategic intervention in domestic violence matters that fully reflects and responds to the complexity of domestic violence. In the IIC members' experience,¹ effective interventions focus on the health of the relationships in the family, rather than, for example, solely on gender. The IIC submits that in its members' experience domestic and family violence is often the outcome of existing and unaddressed relationship dysfunction. Such dysfunction can ultimately manifest in acts of violence, and any success with interventions should combine holistic legal and therapeutic services at strategic "circuit breaking" points. The IIC further submits that ultimately the appropriate metric by which to measure the success of domestic violence interventions is whether it has changed the level of risk for victims, which can include women, children and men.²

Ideally, strategic interventions would provide victims with access to services that:

- (a) In an emergency provide them immediate and supported access to safety away from the perpetrator; and

¹ Members of the Society's IIC include members with direct experience with Legal Aid NSW's family law early intervention unit, and with the provision of therapeutic services to parties of domestic violence matters.

² For example, in the IICs view, the proposed NSW Government information sharing protocol to prevent domestic violence is unlikely to improve the safety of victims. Rather, it is likely to increase the likelihood of child removal without addressing the systemic issues resulting in domestic violence.

- (b) In relationships where people are experiencing stress and are at risk of domestic violence, education, counselling and support in respect of the stresses on family life should be made available; and
- (c) In matters where a family has experienced domestic violence, parties need early intervention legal advice about the domestic violence legal system (Apprehended Domestic Violence Orders or “ADVOs”) and its interaction with the child care and protection and family law systems. In addition to early intervention legal support, families should also have access to early intervention therapeutic services. In the IIC members’ experience, the best outcomes are achieved when legal and therapeutic services³ are provided together.

2. Matters addressed in the Inquiry Terms of Reference

The Committees’ submission relates to paragraphs (b) to (f) of the terms of reference.

The IIC reiterates that, if the underlying purpose of the Inquiry is to improve the safety of victims and persons at risk, domestic violence should be considered from the perspective of family and relationship dysfunction. The IIC notes that there are matters where children are the victims of violence perpetrated by women. While the IIC acknowledges that violence against women, including domestic violence, is a serious matter that requires redress,⁴ it would assist the Inquiry to broaden the terms of reference to respond to all victims of domestic violence.

2.1. General observations – adequacy of policy and community responses to domestic violence

It is the experience of members of the IIC that what improves safety is **action** by the victim, the perpetrator or the government, the medical or welfare system. For example, the IIC notes that in New South Wales there are mandatory reporting requirements in relation to domestic violence, and the Department of Justice has recently sought comments from stakeholders on an information-sharing protocol.⁵ In the view of the IIC, these policy initiatives are likely to have little effect on improving safety for victims as they do not facilitate effective intervention at the appropriate time, and also fail to achieve a holistic approach to the problem of domestic violence.

In the view of the IIC, the types of action that may improve safety can be proactive or imposed. An example of a proactive action is a change in the living arrangements where victims or perpetrators remove themselves from an unsafe domestic situation: such as one person moving out or one person going to refuge accommodation. The IIC notes that there is a serious shortage of specialist women’s only (or men’s only) domestic violence shelters, and virtually no specialist domestic violence shelters for

³ Examples of appropriate therapeutic services include drug and alcohol services, mental health services, financial counselling and parenting programs.

⁴ According to recent statistics, 1 in 6 Australian women have experienced physical or sexual violence from a current or former partner; this figure is 1 in 19 for men. One in 4 women have experienced emotional abuse by a current or former partner; this figure is 1 in 7 for men. It is more likely for a person to experience violence from a male rather than a female perpetrator and over 3 times as many people experienced violence from a male. See: http://www.whiteribbon.org.au/uploads/media/updated_factsheets_Nov_13/Factsheet_5_Facts_and_figures.pdf and <http://www.anrows.org.au/sites/default/files/Violence-Against-Australian-Women-Key-Statistics.pdf> and <http://www.anrows.org.au/sites/default/files/Fast-Facts---Indigenous-family-violence.pdf>, accessed on 6 August 2014.

⁵ Draft NSW Government Information Sharing to Prevent Domestic Violence Protocol July 2014.

Aboriginal and Torres Strait Islander peoples. In the IICs view, the availability of these shelters is a key circuit breaker in violent situations. This point is discussed in more detail at 2.2.

A further proactive action is effecting cultural change within the relationship, which, in the experience of IIC members, usually requires strategic therapeutic intervention. For example, the IIC notes the New Parent and Infant Network model ("Newpin"), is a preventative, therapeutic program that works intensively with families facing potential or actual child protection issues. The overall aim of Newpin is to intervene early and to offer families a unique opportunity to affect positive change in their lives and relationships through personal development in a safe and supported environment.⁶ This proactive parenting program creates a community within local government areas, and provides space for a facilitated playgroup for fathers. The workers are trained in play therapy, and assist fathers with parenting skills, including basic skills such as bathing, nappy changing, feeding, sleeping and appropriate developmental expectations of children.

Newpin facilitates counselling and intensive support for families including allowing for families who have completed the Newpin program to mentor families new to the program. Newpin also provides letters of support for court matters as evidence of the improvement of parenting skills. The view of the IIC is that it is crucial to proactively address parenting and parenting capacity. In the case of Newpin, the IIC notes that funding structures have recently changed and that the only referral point is now the NSW Department of Family and Community Services. In the view of the IIC this is a retrograde step. In order to address the issues that lead to domestic violence, it is more useful for the various therapeutic services and Hubs to refer directly to services such as Newpin.

Interventions in domestic living arrangements may be imposed by the legal system in an effort to improve safety. Such interventions include parental responsibility contracts requiring one parent to move out imposed by the relevant State child protection department (the Department of Family and Community Services in NSW); child removal, and the incarceration of the other parent. In the experience of members of the IIC, when matters progress to this crisis point, it is a result of inadequate early intervention. In noting these interventions, the IIC is not providing an opinion on the merits of these interventions but notes the disproportionately high rates of incarceration of Indigenous peoples, and the removal of Aboriginal children.

The IIC submits that if an intervention is to successfully effect change, the timing of the intervention is crucial. In the experience of members of the IIC, there are a number of identifiable points at which intervention is most effective.

ADVO first mention

The IIC notes that the Legal Aid NSW *ADVO Defendant Pilot Mount Druitt Local Court Final Review Report* stated that:

...[T]he first AVO mention date was identified as a critical intervention point, at which time people were most open to legal advice. It was argued that it was the ideal point at which to provide family law advice to both parties, including robust advice to defendants about the implications of AVO breaches, such as the possibility of

⁶ <http://www.newpin.org.au>, accessed on 11 August 2014.

children being removed by the State. This was perceived to be a particular issue for Aboriginal clients....⁷

The IIC agrees that the opportunity for parties to engage with therapeutic and legal services is critical at this juncture, so that people are advised of their options and pathways.⁸ Legal intervention can provide the critical prompt for parties to make necessary changes in their family and relationship arrangements, particularly if parties are advised as to the consequences of continuing without initiating change, and the implications of mandatory reporting for possible child removal. The IIC strongly emphasises the need for coordinated services and intervention at the point of the intersection of domestic violence and the legal system, such as offering services to both parties in a court ADVO list.

The IIC notes that effective information sharing among courts, agencies and legal representatives at this point would allow professionals to assess clients at the point of crisis and to facilitate:

- (a) Timely assessment with respect to the domestic violence incident in relation to legal and non-legal referrals;
- (b) Timely offers of ongoing service at a point where the clients are likely to engage;
- (c) Engagement by therapeutic service providers who have personally assessed the risk;
- (d) Timely Information sharing at the point of engagement and assessment; and
- (e) Engagement encouraged and supported by the legal process and judicial officers.

The IIC notes that this type of face-to-face service is more effective particularly for Aboriginal clients, as well as direct referrals from the court. In the IIC members' experience, Aboriginal peoples are less likely to engage proactively with mainstream services.

Other intervention points

Other appropriate points of intervention include:

- a) Pregnant women accessing ante-natal services;
- b) Parents with very young children who are accessing services such as Tresillian Family Care and Karitane and exhibiting signs of post natal depression and difficulty with coping with more than one child in the family; and
- c) Hospitals where children present with signs of neglect, and women and children may present with serious and/or unexplained injuries.

Such intervention should take the form of referral to the appropriate legal and therapeutic services. The IIC notes that while hospitals have mandatory reporting to

⁷ Legal Aid NSW, *ADVO Defendant Pilot Mount Druitt Local Court Final Review Report*, June 2013, p 15.

⁸ The IIC notes that mediation and family dispute resolution is not an effective option for AVO matters. This approach entails a wait of a number of months, only to then have the matter determined inappropriate for mediation because of the factor of violence. In the IICs view, this process paralyses the matter and does not provide a clear pathway to the family law system.

the NSW Department of Family and Community Services, they are not required to make legal referrals. These junctures may also provide the opportunity for strategic intervention. For example, it may be safer for a domestic violence victim to seek advice from a lawyer at the hospital rather than at home.

2.2. Lack of government funding for domestic violence services – refuges

The Committees are deeply concerned about the lack of government funding available to assist victims of domestic violence.

The Committees are concerned about the risks to victims of domestic violence where services for victims are inadequate and exacerbate the serious and harmful impact on children who are exposed to domestic violence.

The NSW Government has recently implemented the "Going Home Staying Home" reform designed to reduce homelessness. Under the "Going Home Staying Home" reforms, 336 individual services have been consolidated into 149 new service packages that will be led by 69 non-government organisations, supported by their partner agencies.⁹ The Committees understand that the tender criteria has favoured larger or consolidated generalist services, and as a consequence this reform has resulted in the loss of up to 80 homelessness services with expertise in domestic violence, mental illness, drug and alcohol dependence, youth, Aboriginal peoples and immigrants. Some services have decided to close their doors after decades; others will continue to operate under the management of new generalist providers such as St Vincent de Paul, Mission Australia, the Salvation Army and Wesley Mission.¹⁰ The Committees are concerned about the effect that these reforms will have on the capacity of women and children to escape domestic violence. The IIC notes that refuges provide an immediate response to critical situations of violence that are a circuit breaker to safety.

The IIC is particularly concerned about the provision of refuge and other services to Aboriginal women and children in Western NSW. These geographical areas of NSW have very high rates of domestic violence against women and children compared with other locations in NSW. For example, the rate of domestic violence related assault is 10 times the State average in Bourke, Wilcannia, Walgett and Brewarrina. Further, the number of incidents of domestic violence related assault has increased by 62% in Brewarrina for the period from March 2012 to March 2014.¹¹ Generalist faith-based service providers have recently won tenders to provide services to areas including Walgett, Bourke, Wilcannia and Brewarrina. Services to be provided by these organisations do not appear to focus on Aboriginal women and children escaping domestic violence and now include families, men and young people as target groups. The IIC is concerned that an increase in the types of groups serviced and targeted by these organisations and the move away from specialised services for Aboriginal women and children will have effect on whether women and children will

⁹ "New Providers of Homelessness Services Announced", NSW Department of Community and Family Services Media Release, 13 June 2014, http://www.facs.nsw.gov.au/about_us/media_releases/new_providers_of_homelessness_services_announced, accessed on 28 July 2014.

¹⁰ "Women's refuges closing down after reform fails them", Sydney Morning Herald, 19 June 2014, <http://www.smh.com.au/nsw/womens-refuges-closing-down-after-reform-fails-them-20140619-zse72.html#ixzz38jtIMT00>, accessed on 28 July 2014.

¹¹ NSW Recorded Crime Statistics – Quarterly Update March 2014, NSW Bureau of Crime Statistics and Research, Table 2.3A p 12 and Table 2.3B pp 14-15. http://www.bocsar.nsw.gov.au/agdbasev7wr/assets/bocsar/m71685413/nswrecordedcrimestatistic_smar2014_sa4.pdf, accessed on 12 August 2014.

feel safe in generalist refuges and whether they will seek to escape domestic violence.

The IIC also notes that the funding packages offered to refuge service providers require service providers to work with Aboriginal clients as a percentage of the overall client base. This approach represents a superficial understanding of how to successfully engage with Aboriginal communities. Successful engagement requires careful planning and engagement based on relationships with the Aboriginal community. Faith-based generalist services who seek to engage with the Aboriginal community will need to build partnerships with Aboriginal community controlled organisations and may need to employ Aboriginal staff and management.

The HRC is specifically concerned about whether this policy will amount to a violation of Article 1 of CEDAW on the grounds that Australia will not be taking 'appropriate and effective measures' in NSW to eliminate gender based violence as required by para. 24(a) of *General Recommendation 19*.¹² Paragraph 24(k) of *General Recommendation 19* recommends the establishment of refuges for the victims of such violence. Refuges for women who are victims of domestic violence offer specialised services and safe shelter for women and children. Generalist shelters for homeless people may not offer the specialised assistance required to leave violent relationships.

Specialist women's refuges also provide outreach services to the Family Law Courts. The Committees note that the women's refuge "Elsie" used to provide funding for a domestic violence support worker at the Sydney Registry of the Federal Circuit Court of Australia. There are doubts about the continuation of this service as a direct result of the NSW Government reforms. The FIC supports the continued resourcing of a domestic violence support worker at the Family Law Courts by specialist women's refuge services and is very concerned about the loss of this service. The IIC has serious concerns as to whether the new generalist providers will be able to meet the needs of Aboriginal women (or indeed men) at the standard of the previous system.

2.3. Lack of government funding for victims of domestic violence – Contact Services

The FIC is also concerned about the lack of government funding available for Children's Contact Services ("Contact Services"). Accredited Contact Services are funded and approved under the Family Relationships Services Australia. Contact Services aim to minimise a child's exposure to conflictual or unsafe situations by providing safe, neutral and child-focused venues for facilitated visits and changeovers to occur between children and their parents.¹³

The FIC is of the view that there is a need for the expansion of supervised changeover services currently provided by a limited number of Contact Service Centres in Sydney. The direct experience of FIC members with Contact Services is that families who need to access Contact Services are being placed on a waiting list. A place is only offered when it becomes available. Depending upon the location of the Contact Service Centre and the demand in a particular geographical area, families can wait up to 12 months to access the services provided by such Centres.

¹² See also *AT v Hungary*, CEDAW Communication No. 2/2003, U.N. Doc. CEDAW/C/32/D/2/2003 (2005).

¹³ *A guideline for family law courts and children's contact services*, 2007, p 1, http://www.familylawcourts.gov.au/wps/wcm/resources/file/eb8c7f46e28beb9/CCS_Guidelines.pdf, accessed on 28 July 2014.

The FIC is of the view that children are exposed to unacceptable risks of harm because of the limited funding and availability of Contact Services in NSW.

2.4. Funding for support and behavioural change programs for perpetrators

While there is very general education available on healthy relationships, the IIC is concerned that there are no educational or public health initiatives that highlight the signs of unhealthy relationships, and the risks and outcomes of those relationships.

The IIC considers that there should be significant protected funding quarantined to healthy relationships programs that do not involve the labels of “victim” and “perpetrator.” It is necessary to focus on emerging young families with a culture of general violence by both parties, often in the context of drug and alcohol abuse, which can be complicated by mental health issues. The IIC submits that this issue requires dedicated funding for Aboriginal families that includes services provided by Aboriginal community-controlled and community-targeted organisations.

The Committees support an increase in funding for support and behavioural change programs for the perpetrators of domestic violence. The Committees have observed that there appears to be few resources or responses from government on this area of domestic violence in Australia.

2.5. Reduction in funding of Legal Aid Commissions

The Committees are concerned about recent Commonwealth and NSW funding cuts to Legal Aid Commissions. The Committees are of the view that funding cuts to the Commissions has had a direct impact on the ability of the most disadvantaged in the Australian community to access justice.

The FIC and IIC have observed that as a result of funding cuts, funding for expert reports in proceedings in the Family Law Courts is often unavailable. Part 15 of the *Federal Circuit Court Rules 2001* (Cth) and Part 15.5 of the *Family Law Rules 2004* (Cth) provide for expert evidence to be considered by the Court in relation to family law proceedings. In proceedings involving victims of domestic violence, including child victims or the children of victims, the Court uses expert evidence to conduct an assessment of the level of risk of harm to a party. In particular, the Court will refer to expert evidence when making interim and final orders regarding arrangements for the future contact and parenting arrangements of children. Without evidence from experts (such as psychiatrists) about factors including psychiatric or psychological illness or personality disorder, the Committees are concerned about the capacity of the Courts to make a proper assessment of risks of future harm and exposure to domestic violence, potentially exposing victims of domestic violence to the risk of future harm.

2.6. Capacity of Family Law Courts to undertake early risk assessments

The FIC has observed that there is often a lack of expert evidence available in family law proceedings filed in the Federal Circuit Court and Family Court where domestic violence and violence towards children has been alleged. The FIC is concerned about the capacity of the Family Law Courts to undertake an assessment of the risk of violence at an early stage in proceedings where no expert evidence is available. FIC members note that often no expert evidence is available for around 8-10 months after a proceeding is filed.

The FIC notes that currently there is no common or joint assessment tool used by the Family Law Courts, legal practitioners, counsellors, consultants and other family law professionals. The Family Law DOORS (Detection of Overall Risk Screen) is an empirically based and standardised front line screening framework used by legal practitioners to detect and respond to wellbeing and safety risks to separating parents and children. The DOORS enables a practitioner to identify imminent personal and interpersonal safety risks to a client at the point of entry to a particular service, including physical and psychological harm, or of perpetrating harm. The DOORS provides practitioners and their clients with response planning resources and resources for specialist follow up.¹⁴ The FIC is of the view that it would assist victims of domestic violence if all professionals involved in providing services to victims applied a common screening and assessment tool at the initial point of contact with a victim.

3. Review of successful domestic violence strategies

The IIC submits that there is a need for evidence-based analysis of risk in relation to domestic violence. There is also a need for a comprehensive evaluation of successful interventions in domestic violence matters including options and services which do in fact support clients out of domestic violence situations, or which changed the culture of families away from domestic violence.

For example, the IIC notes the Legal Aid NSW ADVO Pilot Project which aimed to "test the proposition that providing holistic minor assistance and duty representation to defendants in AVO matters reduces future legal problems (in crime, civil and family law areas)." The preliminary findings of this Report (noting the incomplete and conditional nature of the data available on ADVO breaches) suggests that there were no breaches of final orders where the matters were adjourned for legal advice. In the views of stakeholders, where defendants were given the opportunity to engage legal advice, there was an increased understanding of the process and the AVO itself. These factors led to AVOs that were more realistic, took into account child contact arrangements (as a result of early intervention family lawyers) and were therefore less likely to be breached.¹⁵ The Report also made recommendations for the program itself, including the importance of the Legal Aid domestic violence duty solicitor having both family and criminal law expertise, that the duty solicitor be a private practitioner to avoid any conflict of interest; and the need for stakeholders (including the police) to be educated about AVOs, the availability of services, and referral pathways.¹⁶

The IIC supports the funding of other pilot projects such as training and education of legal practitioners in therapeutic services for Aboriginal peoples to enable a holistic approach to addressing disadvantage by Aboriginal and Torres Strait Islander peoples and facilitating access to justice.

The IIC endorses the *Federal Circuit Court Reconciliation Action Plan 2014-2016*¹⁷ ("RAP"). The IIC notes that the purpose of the RAP is to allow Aboriginal and Torres Strait Islander People improved access to justice through the Federal Circuit Court. The Federal Circuit Court of Australia ("the Court") consulted with legal services who work directly with the Aboriginal and Torres Strait Islander community

¹⁴ See <http://www.familylawdoors.com.au/>, accessed on 11 August 2014.

¹⁵ Final Report, Note 7, pp12-13.

¹⁶ Final Report, Note 7, pp19-23.

¹⁷ http://www.federalcircuitcourt.gov.au/pubs/docs/FCC_RAP_2014.pdf, accessed on 11 August 2014.

and other agencies such as Health Services, family violence prevention units and community welfare services. The Court also sought direction and guidance from the Aboriginal and Torres Strait Islander community. Action items included in the plan which may facilitate access to justice for Aboriginal and Torres Strait Islander victims of domestic violence include the establishment of Aboriginal Family Law Pathways Networks and National and State-based Indigenous Family Law Conferences.¹⁸

Once again the Law Society appreciates the opportunity to comment. If you have any questions please contact Emma Liddle, policy lawyer for the FIC, on emma.liddle@lawsociety.com.au or (02) 9926 0212.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Tidball', with a long horizontal stroke extending to the right.

Michael Tidball
Chief Executive Officer

¹⁸ Refer to *Federal Circuit Court Reconciliation Action Plan 2014-2016*, items 1.3 and 3.1.