

6 Aboriginal family violence

6.1 Aboriginal people are overrepresented as victims of family violence by a factor of 10

The Office's analysis in Chapters 4 and 5 identified that, while Aboriginal and Torres Strait Islander people make up 3.1 per cent of Western Australia's population,³⁰¹ Aboriginal people comprised 33 per cent of victims of family and domestic violence offences against the person detected by WAPOL in the investigation period (section 4.3.1) and 50 per cent of the people who were killed in the 30 fatalities (section 5.2.5).

The Office's analysis further identified that Aboriginal people who were killed were more than twice as likely as non-Aboriginal people to be known to WAPOL due to domestic violence incidents involving themselves and the suspected perpetrator. In 16 of the 30 fatalities (53 per cent) WAPOL recorded a history of family and domestic violence between the person who was killed and the suspected perpetrator. In 11 of these 16 fatalities (69 per cent), the person who was killed was Aboriginal.

The findings of the Office's analysis are consistent with the research literature which identifies that Aboriginal people are 'more likely to be victims of violence than any other section of Australian society',³⁰² and that Aboriginal people experience family and domestic violence at 'significantly higher rates than other Australians'.³⁰³ In addition, Aboriginal women are:

- '45 times more likely to be victims of [family] violence than their non-Aboriginal counterparts';³⁰⁴
- '10 times more likely to be victims of homicide and ... 35 times as likely to be hospitalised due to family and domestic violence-related assaults as other Australian females';³⁰⁵ and
- 'more likely to access emergency accommodation or [a] refuge'³⁰⁶ as a result of intimate partner violence.

³⁰¹ Australian Bureau of Statistics, '2011 Census Counts – Aboriginal and Torres Strait Islander Peoples', *Census of Population and Housing – Counts of Aboriginal and Torres Strait Islander Australians, 2011*, cat. no. 2075.0, ABS, Canberra, June 2012.

³⁰² Cripps, K and Davis, M, *Communities working to reduce Indigenous family violence*, Brief 12, June 2012, Indigenous Justice Clearinghouse, New South Wales, 2012, p. 1.

³⁰³ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Ending family violence and abuse in Aboriginal and Torres Strait Islander communities – Key issues, An overview paper of research and findings by the Human Rights and Equal Opportunity Commission, 2001 – 2006*, Human Rights and Equal Opportunity Commission, June 2006, p. 6.

³⁰⁴ Goulding D, *The Role of Socio-Economic and Familial Factors in the Pursuit of Final Violence Restraining Orders For Women Subjected to Family and Domestic Violence*, Centre for Social and Community Research, Murdoch University, Perth, 2007, p. v.

³⁰⁵ Ferrante, A, *Measuring the extent of domestic violence*, Hawkins Press, Sydney, 1996 and Australian Institute of Health and Welfare (AIHW): Al-Yaman, F, Van Doeland, M, and Wallis, M, *Family violence among Aboriginal and Torres Strait Islander peoples*, AIHW, Canberra, 2006, cat. no. IHW 17, cited in Department for Child Protection and Family Support, *Practice guidelines: Women and Children's Family and Domestic Violence Counselling and Support Programs, Western Australian edition*, Department for Child Protection and Family Support, Perth, 2013, p. 8.

As observed by the former Aboriginal and Torres Strait Islander Social Justice Commissioner Tom Calma:

Family violence is abhorrent and has no place in Aboriginal or Torres Strait Islander societies. It is a scourge that is causing untold damage and trauma among Indigenous communities, to our women and children, and to the fabric of Indigenous cultures.³⁰⁷

6.2 Understanding Aboriginal family violence

The research literature identifies that concepts of family and domestic violence in Aboriginal communities are broader than mainstream definitions of domestic violence, with the term 'family violence' better reflecting the experiences of Aboriginal people.³⁰⁸ The former Aboriginal and Torres Strait Islander Social Justice Commissioner explored the concept of family violence in Aboriginal families and communities as follows:

Family violence involves any use of force, be it physical or non-physical, which is aimed at controlling another family or community member and which undermines that person's well-being. It can be directed towards an individual, family, community or particular group. Family violence is not limited to physical forms of abuse, and also includes cultural and spiritual abuse. There are interconnecting and trans-generational experiences of violence within Indigenous families and communities.³⁰⁹

Representatives of Aboriginal and Torres Strait Islander people, and women in particular, have identified that:

The nature, history and context of family violence in Aboriginal and Torres Strait Islander communities is different to domestic violence experienced in mainstream communities and populations. Aboriginal and Torres Strait Islander people continue to suffer the intergenerational effects of past welfare practices including the forced removal of their children and dislocation from their communities, country and culture, as well as experiencing higher levels of poverty and social disadvantage compared to other Australians. The combined

³⁰⁶ Morgan, A, and Chadwick, H, *Key issues in domestic violence*, Australian Institute of Criminology, Australian Government, Canberra, December 2009, viewed 18 February 2015, <<http://www.aic.gov.au/publications/current%20series/rip/1-10/07.html>>, p. 4.

³⁰⁷ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Ending family violence and abuse in Aboriginal and Torres Strait Islander communities – Key issues, An overview paper of research and findings by the Human Rights and Equal Opportunity Commission, 2001 – 2006*, Human Rights and Equal Opportunity Commission, June 2006, p. 4.

³⁰⁸ For example, Australian Institute of Health and Welfare, *Family violence among Aboriginal and Torres Strait Islander peoples*, Australian Institute of Health and Welfare, cat. no. IHW 17, Canberra, viewed 10 September 2015, <<http://www.aihw.gov.au/publication-detail/?id=6442467912>>; Department for Child Protection and Family Support, *Family and Domestic Violence Background Paper*, Government of Western Australia, Perth, 2012, p. 2.

³⁰⁹ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Ending family violence and abuse in Aboriginal and Torres Strait Islander communities – Key issues, An overview paper of research and findings by the Human Rights and Equal Opportunity Commission, 2001 – 2006*, Human Rights and Equal Opportunity Commission, June 2006, p. 6.

effects of past practices and current disadvantages present extreme challenges to families.³¹⁰

The research literature observes a number of contextual factors contributing to the prevalence and seriousness of family violence in Aboriginal communities:

...[V]iolence against women within the Indigenous Australian communities need[s] to be understood within the specific historical and cultural context of colonisation and systemic disadvantage. Any discussion of violence in contemporary Indigenous communities must be located within this historical context. Similarly, any discussion of “causes” of violence within the community must recognise and reflect the impact of colonialism and the indelible impact of violence perpetrated by white colonialists against Indigenous peoples...A meta-evaluation of literature...identified many “causes” of family violence in Indigenous Australian communities, including historical factors such as: collective dispossession; the loss of land and traditional culture; the fragmentation of kinship systems and Aboriginal law; poverty and unemployment; structural racism; drug and alcohol misuse; institutionalisation; and the decline of traditional Aboriginal men’s role and status - while “powerless” in relation to mainstream society, Indigenous men may seek compensation by exerting power over women and children...³¹¹

6.2.1 Aboriginal victims of family and domestic violence and seeking help

In addition to the challenges faced by all victims in reporting family and domestic violence, the research literature identifies additional disincentives to reporting family and domestic violence faced by Aboriginal people, including:

Indigenous women continuously balance off the desire to stop the violence by reporting to the police with the potential consequences for themselves and other family members that may result from approaching the police; often concluding that the negatives outweigh the positives. Synthesizing the literature on the topic reveals a number of consistent themes, including: a reluctance to report because of fear of the police, the perpetrator and perpetrator’s kin; fear of “payback” by the offender’s family if he is jailed; concerns the offender might become “a death in custody”; a cultural reluctance to become involved with non-Indigenous justice systems, particularly a system viewed as an instrument of dispossession by many people in the Indigenous community; a degree of normalisation of violence in some families and a degree of fatalism about change; the impact of “lateral violence” ... which makes victims subject to intimidation and community denunciation for reporting offenders, in Indigenous communities; negative experiences of contact with the police when previously attempting to report violence (such as being arrested on outstanding warrants); fears that their children will be removed if they are seen as being part of an

³¹⁰ National Aboriginal and Torres Strait Islander Women’s Alliance, *Submission to the Finance and Public Administration Committee Inquiry Into Domestic Violence in Australia*, National Aboriginal and Torres Strait Islander Women’s Alliance, New South Wales, 31 July 2014, p. 4.

³¹¹ Blagg, H, Bluett-Boyd, N, and Williams, E, *Innovative models in addressing violence against Indigenous women: State of knowledge paper*, Australia’s National Research Organisation for Women’s Safety Limited, Sydney, New South Wales, August 2015, p. 3.

abusive house-hold; lack of transport on rural and remote communities; and a general lack of culturally secure services.³¹²

The research literature further suggests that Aboriginal people ‘especially women, are dissuaded from approaching mainstream legal services ... [due to] [l]anguage barriers and the need for targeted, cultural sensitivity’.³¹³ The 2004 Gordon Inquiry outlined some of the challenges for Western Australian government agencies responding to Aboriginal family violence as follows:

Aboriginal women are also suspicious of involvement with justice and welfare agencies. They see aspects of the system – particularly prisons – as an aspect of the violence cycle which de-socialises, brutalises and de-skills their menfolk... There is a profound mistrust of social work agencies who may take the children away from a violent home, and there is still considerable suspicion of police involvement in domestic disputes.³¹⁴

These barriers to Aboriginal people seeking help mean that ‘Aboriginal women are increasingly vulnerable to the risks and effects of violence.’³¹⁵

The findings of the Office’s analysis regarding use of violence restraining orders by Aboriginal people are consistent with and support the findings of the research literature. The Office’s analysis, set out in detail in Part 2 of this report, demonstrates that there are distinct differences in the use of VROs between Aboriginal people and non-Aboriginal people. By way of example, the Office’s analysis of the state-wide data found that, in the investigation period, only 11 per cent of applicants for VROs identified themselves as Aboriginal or Aboriginal and Torres Strait Islander, even though Aboriginal people who were killed were more than twice as likely as non-Aboriginal people to be known to WAPOL due to domestic violence incidents involving themselves and the suspected perpetrator. That is, the relatively high level of contact with WAPOL by Aboriginal victims was not necessarily associated with Aboriginal victims accessing VROs to protect themselves and their children.

³¹² Blagg, H, Bluett-Boyd, N, and Williams, E, *Innovative models in addressing violence against Indigenous women: State of knowledge paper*, Australia’s National Research Organisation for Women’s Safety Limited, Sydney, New South Wales, August 2015, p. 13.

³¹³ Law Council of Australia, *Submission to the Senate Legal and Constitutional Affairs Committee Inquiry into Access to Justice*, Law Council of Australia, Canberra, 2009, p. 24.

³¹⁴ Gordon, S, Hallahan, K and Henry, D, *Putting the picture together, Inquiry into Response by Government Agencies to Complaints of Family Violence and Child Abuse in Aboriginal Communities*, Department of Premier and Cabinet, Western Australia, 2002, p. 86.

³¹⁵ New South Wales Department of Health, *Aboriginal Family Health Strategy 2011-2016: Responding to Family Violence in Aboriginal Communities*, New South Wales Government, Sydney, 2011, p. 7.

6.3 Strategies addressing Aboriginal family violence

6.3.1 The National Plan to Reduce Violence against Women and their Children

Outcome 3 of the National Plan expressly acknowledges the ‘legacy of past [government social policy] failures’³¹⁶ and the need for collaboration so that ‘Indigenous communities are strengthened’,³¹⁷ stating that:

The *National Plan* is focused on supporting Indigenous communities to develop local solutions to preventing violence ... Given the significant disadvantage experienced by Indigenous Australians, this outcome focuses on strengthening Indigenous communities to better tackle family violence and sexual assault ... [through the following strategies:]

Strategy 3.1: Foster the leadership of Indigenous women within communities and broader Australian society...

Strategy 3.2: Build community capacity at the local level ... [and]

Strategy 3.3: Improve access to appropriate services.³¹⁸

Key actions and national initiatives related to each of these three strategies are also identified in the National Plan.

6.3.2 Victoria

In 2008, the Victorian Aboriginal community and the Victorian Government released *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities 10 year plan (Strong Culture, Strong Peoples, Strong Families)* to enable ‘a strategic approach to address Indigenous family violence’ with the following eight objectives:

- 1 **Cultural Safety:** Make Victoria a safer place for all Indigenous Victorians.
- 2 **Healthy Families:** Support strong, robust and healthy families that provide a safe nurturing environment.
- 3 **Education, Awareness, Prevention:** Intervene early to improve education, awareness and prevention of family violence.
- 4 **Safety for Victims:** Increase the safety of Indigenous families and individuals, especially women and children.
- 5 **Accountability:** Increase the accountability and personal responsibility of perpetrators of family violence within Indigenous communities.

³¹⁶ Council of Australian Governments, *National Plan to Reduce Violence against Women and their Children 2010 – 2022*, Australian Government, Canberra, February 2011, viewed 4 February 2014, <<http://www.dss.gov.au/our-responsibilities/women/programs-services/reducing-violence/the-national-plan-to-reduce-violence-against-women-and-their-children>>, p. 20.

³¹⁷ Council of Australian Governments, *National Plan to Reduce Violence against Women and their Children 2010 – 2022*, Australian Government, Canberra, February 2011, viewed 4 February 2014, <<http://www.dss.gov.au/our-responsibilities/women/programs-services/reducing-violence/the-national-plan-to-reduce-violence-against-women-and-their-children>>, p. 20.

³¹⁸ Council of Australian Governments, *National Plan to Reduce Violence against Women and their Children 2010 – 2022*, Australian Government, Canberra, February 2011, viewed 4 February 2014, <<http://www.dss.gov.au/our-responsibilities/women/programs-services/reducing-violence/the-national-plan-to-reduce-violence-against-women-and-their-children>>, p. 20-21.

- 6 **Healing:** Increase opportunities for healing for victims and perpetrators.
- 7 **Service Capability:** Increase the cultural competency and capacity of the service system to improve responses to Indigenous family violence.
- 8 **Research and Evaluation:** Improve the effectiveness and efficiency of responses to Indigenous family violence through ongoing research and evaluation.³¹⁹ [Original formatting and emphasis]

Strong Culture, Strong Peoples, Strong Families also identifies the following 12 '[k]ey elements of good practice for effective Indigenous family violence programs' to 'guide the design, development and delivery of programs and services within the 10 year plan'³²⁰ as it moves from 'a need for tertiary services to a stronger primary prevention focus':³²¹

- 1 *Cultural grounding of programs*
- 2 *Community grounding/development of programs and inclusive community approaches*
- 3 *Composite programs, integration and holistic approaches*
- 4 *Engagement of men, women and children in programs*
- 5 *Ensuring the involvement of appropriate Elders*
- 6 *Self-empowerment and self-esteem as capacity building by-products*
- 7 *Examining inter-generational family history and cultural experience as a healing element*
- 8 *Culturally competent responses, including group approaches*
- 9 *Capacity building through networking partnerships and interagency collaboration*
- 10 *Information collection and dissemination*
- 11 *Training and skills acquisition*
- 12 *Flexibility and adaptability of programs*³²² [original formatting]

6.3.3 New South Wales

The New South Wales Aboriginal Family Health Strategy 2011-16: Responding to Family Violence in Aboriginal Communities, is structured around Aboriginal family and culture, and founded on an Aboriginal Family Health Model of Care. Core elements of this model include strategic leadership, effective service delivery, a culturally competent workforce, and a strong community capacity,³²³ and are informed by key principles including a

³¹⁹ Victorian Department of Planning and Community Development, *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities, 10 Year Plan, Second Edition*, State Government of Victoria, Melbourne, 2008, p. 32.

³²⁰ Victorian Department of Planning and Community Development, *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities, 10 Year Plan, Second Edition*, State Government of Victoria, Melbourne, 2008, p. 33.

³²¹ Victorian Department of Planning and Community Development, *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities, 10 Year Plan, Second Edition*, State Government of Victoria, Melbourne, 2008, p. 32.

³²² Victorian Department of Planning and Community Development, *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities, 10 Year Plan, Second Edition*, State Government of Victoria, Melbourne, 2008, p. 33.

³²³ New South Wales Department of Health, *Aboriginal Family Health Strategy 2011-2016: Responding to Family Violence in Aboriginal Communities*, New South Wales Government, Sydney, 2011.

whole-of-life view of health, self-determination, working in partnership, cultural understanding, and recognition of trauma and loss.³²⁴

The New South Wales Aboriginal Family Health Strategy 2011-16: Responding to Family Violence in Aboriginal Communities aims '[t]o reduce the incidence and impact of family violence in Aboriginal communities; to build the capacity and strength of individuals and communities to prevent, respond to and recover from family violence to nurture the spirit, resilience and cultural identity that build Aboriginal families.'³²⁵

6.3.4 Western Australia's Family and Domestic Violence Prevention Strategy to 2022: Creating Safer Communities

Currently in Western Australia, there is no strategy solely aimed at addressing family violence experienced by Aboriginal people and in Aboriginal communities.

As discussed in Chapter 4, the State Strategy sets out the state government's framework for responding to family and domestic violence. The State Strategy identifies that, the previous (now expired) *WA Implementation Plan to 2013*, under 'Outcome 1: Prevention and Early Intervention,' included 'Action Area 1.4, Support and improve the links between Aboriginal organisations and government and community sector agencies working with family and domestic violence to provide a coordinated and integrated response.'³²⁶

Aboriginal stakeholders have identified that the State Strategy 'absorbs issues for Aboriginal people into the general statement of outcome prevention and early intervention, safety for victims and accountability'³²⁷ for perpetrators, and that '[t]his is of concern if the plan is to be effective, and more so if it is to be effective for those further marginalised by racism and other structural disadvantage.'³²⁸ These stakeholders have suggested that an Aboriginal specific strategy should be developed to respond to family violence experienced by Aboriginal people and in Aboriginal communities in Western Australia. For example, in its submission to the Federal Senate Inquiry into Domestic Violence in Australia, Aboriginal Family Law Services (WA) recommended that:

...a greater focus on the issue of family and domestic violence for Aboriginal people be adopted, and that this focus manifest in the form of a statewide strategy. An Aboriginal specific strategy would direct attention to the issues, people, solutions and resources required to make positive change. It would need to be driven by the community, in collaboration with government and

³²⁴ New South Wales Department of Health, *Aboriginal Family Health Strategy 2011-2016: Responding to Family Violence in Aboriginal Communities*, New South Wales Government, Sydney, 2011, p. 16.

³²⁵ New South Wales Department of Health, *Aboriginal Family Health Strategy 2011-2016: Responding to Family Violence in Aboriginal Communities*, New South Wales Government, Sydney, 2011, p. 15.

³²⁶ Department for Child Protection and Family Support, *Western Australia's Family and Domestic Violence Prevention Strategy to 2022*, Perth, 2012, p. 10.

³²⁷ Aboriginal Family Law Services, *Submission to Senate Inquiry into Domestic Violence in Australia*, Aboriginal Family Law Services, East Victoria Park, July 2014, p. 6.

³²⁸ Aboriginal Family Law Services, *Submission to Senate Inquiry into Domestic Violence in Australia*, Aboriginal Family Law Services, East Victoria Park, July 2014, p. 6.

non-government partners, and be a coherent and integrated approach. This would augment and inform the existing state strategy.³²⁹

The findings of the Office's analysis, set out in this report, strongly support the development of a separate strategy (linked to the State Strategy and consistent with, and supported by, the State Strategy) that is specifically tailored to preventing and reducing Aboriginal family violence. This case can be summarised as three key points.

Firstly, the findings of the Office's investigation, set out in Chapters 4 and 5, identify that Aboriginal people are overrepresented, both as victims of family and domestic violence and victims of fatalities arising from this violence.

Secondly, the research literature, discussed in this Chapter suggests a distinctive 'nature, history and context of family violence in Aboriginal and Torres Strait Islander communities.'³³⁰ The research literature further suggests that combating violence is likely to require approaches that are informed by and respond to this experience of family violence. This perspective has been expressed as follows:

Indigenous women's experience of discrimination and violence is bound up in the colour of their skin as well as their gender. The identity of many Indigenous women is bound to their experience as Indigenous people. Rather than sharing a common experience of sexism binding them with non-Indigenous women, this may bind them more to their community, including the men of the community.

Strategies for addressing family violence in Indigenous communities need to acknowledge that a consequence of this is that an Indigenous woman 'may be unable or unwilling to fragment their identity by leaving the community, kin, family or partners' as a solution to the violence.³³¹

Thirdly, the findings of the Office's investigation, set out in Part 2 of this report, demonstrate how the unique factors associated with Aboriginal family violence have resulted in important aspects of the use of VROs by Aboriginal people which are different from those of non-Aboriginal people. Barriers to the use of VROs by Aboriginal people are also discussed in further detail in section 10.3.

The findings of the Office's investigation, together with the findings of the Law Reform Commission Final Report, could inform the development of a strategy which is specifically aimed at addressing Aboriginal family violence.

During the course of the investigation, and as discussed at section 4.6.2, DCPFS and DOTAG informed the Office that the Freedom from Fear Action Plan, released in

³²⁹ Aboriginal Family Law Services, *Submission to Senate Inquiry into Domestic Violence in Australia*, Aboriginal Family Law Services, East Victoria Park, July 2014, p. 6.

³³⁰ National Aboriginal and Torres Strait Islander Women's Alliance, *Submission to the Finance and Public Administration Committee Inquiry Into Domestic Violence in Australia*, National Aboriginal and Torres Strait Islander Women's Alliance, New South Wales, 31 July 2014, p. 4.

³³¹ Aboriginal and Torres Strait Islander Social Justice Commissioner, *Ending family violence and abuse in Aboriginal and Torres Strait Islander communities – Key issues, An overview paper of research and findings by the Human Rights and Equal Opportunity Commission, 2001 – 2006*, Human Rights and Equal Opportunity Commission, June 2006, pp. 6-7.

September 2015, 'underpins a focus on family violence within Aboriginal communities and includes the *Safer Families, Safer Communities Kimberley Family Violence Regional Plan* (the Kimberley Plan).'³³²

Recommendation 4

DCPFS, as the lead agency responsible for family and domestic violence strategic planning in Western Australia, develops a strategy that is specifically tailored to preventing and reducing Aboriginal family violence, and is linked to, consistent with, and supported by *Western Australia's Family and Domestic Violence Prevention Strategy to 2022: Creating Safer Communities*.

As identified at section 5.6.1, given the level of recorded alcohol use associated with the 30 fatalities, it is proposed that DCPFS and the Mental Health Commission collaborate to include initiatives in Action Plans developed under the State Strategy which recognise and address the co-occurrence of alcohol use and family and domestic violence. Similarly, a strategy tailored to preventing Aboriginal family violence should also incorporate strategies that recognise and address the co-occurrence of alcohol use and Aboriginal family violence.

Recommendation 5

DCPFS, in developing the Aboriginal family violence strategy referred to at Recommendation 4, incorporates strategies that recognise and address the co-occurrence of alcohol use and Aboriginal family violence.

6.3.5 An Aboriginal family violence strategy needs to involve Aboriginal people and be informed by Aboriginal culture

The findings of the Office's investigation strongly support that, although consultation with Aboriginal people is essential, a strategy specifically tailored to preventing and reducing Aboriginal family violence should also be driven by Aboriginal people, not just incorporate their views gained through consultation. The strategy must include and encourage the involvement of Aboriginal people in a full and active way, at each stage and level of the development of the strategy, and be comprehensively informed by Aboriginal culture. Doing so would mean that an Aboriginal family violence strategy would be developed with, and by, Aboriginal people, including 'Law People, Elders and Senior Aboriginal people'.³³³

This approach also reflects the right of Aboriginal people and communities to drive and participate in development, enshrined in Article 23 of the *United Nations Declaration on the Rights of Indigenous Peoples*, to which the Australian Government formally announced its support in 2009:

Indigenous peoples have the right to determine and develop priorities and strategies for exercising their right to development. In particular, indigenous

³³² Department for Child Protection and Family Support, personal communication, 19 October 2015; and Department of the Attorney General, personal communication, 20 October 2015.

³³³ Hovane, V, "Dying to be heard": *Family Violence in Aboriginal communities and Implications for Fatality Reviews*, 7 November 2014, presentation to the 4th Australasian Conference on Child Death Inquiries and Reviews, Perth.

peoples have the right to be actively involved in developing and determining health, housing and other economic and social programmes affecting them and, as far as possible, to administer such programmes through their own institutions.³³⁴

Recommendation 6

In developing a strategy tailored to preventing and reducing Aboriginal family violence, referred to at Recommendation 4, DCPFS actively invites and encourages the involvement of Aboriginal people in a full and active way at each stage and level of the process, and be comprehensively informed by Aboriginal culture.

³³⁴ Australian Human Rights Commission, *United Nations Declaration on the Rights of Indigenous Peoples*, Article 23, viewed 22 April 2015, <<https://www.humanrights.gov.au/publications/un-declaration-rights-indigenous-peoples-1>>.