

YOUTH ADVOCACY CENTRE INC



Submission to the

Women's Safety and Justice Taskforce

Discussion Paper 3: Women and girls' experiences across the criminal justice system as victims-survivors of sexual violence and also as accused persons and offenders

April 2022

The Youth Advocacy Centre Inc (YAC) is a community legal and social welfare agency for children aged 10-17 who are involved in, or at risk of involvement in, the youth justice and child protection systems; and those aged 15-25 who are homeless or at risk of homelessness.

YAC's lawyers primarily provide advice and representation to children who are charged with offending behaviour, which may include a sexual offence. YAC's legal clients are more likely to be male than female.

However, the lawyers also provide advice to children who are victims of offences and assist with victim compensation claims. YAC's Youth and Court Support Coordinator has regularly supported girls and young women attending court as witnesses, being the victim of a sexual assault. With the YAC legal education Lawyer, the Coordinator also provides professional development workshops for workers in relation to working with 10–17-year-olds who are victims of abuse or neglect, including sexual assault.

While Discussion Paper 3 refers to "women and girls", the Paper does not have any real focus on those under 18 years of age – as victims or offenders and speaks generically in terms of both.

YAC's response to Discussion Paper 3 will be in relation to those matters of which it has experience and specifically in relation to 10–17-year-olds who have the capacity to provide instructions. Other organisations with a more specific focus of supporting women and girls affected by sexual assault and abuse will be better placed to provide the Taskforce with information in some areas. We are not in a position to comment in relation to children under 10 years of age or who do not have decision making capacity.

The terms 'children', 'girls' and 'boys' are used throughout as our clients are minors at law and to ensure that this remains clear throughout the discussion.

5. What are the experiences of women and girls with multiple and complex intersecting needs as accused persons and offenders in the criminal justice system? What works? What needs to be improved?

The criminal justice system, including the youth justice system, is dominated by male offenders. For the period 2015-16 to 2019-20, 77% of those in the court system were male¹. In 2021, 91% of those in youth detention were male². The proportion of girls by daily average in youth detention dropped from 17% in 2018 to 11% in 2021³ (noting that in 2008, it was 8% in Australia⁴).

If the response to children in the justice system is truly client centred and children are able to participate and be heard, then responses for girls should be appropriate to them and their circumstances. However, it is probably fair to say that the criminal justice system is more geared to boys and young men and insufficient attention is paid to the distinct and differing needs and concerns of young female offenders. The latter have remained around 28% of all young offenders and have moved from 17% to only 10% of those in detention in the last five years⁵. The number of offenders overall is relatively small and it can be tempting to take a "one-size fits all" approach from a resource perspective.

A gender-neutral youth justice system based on the risk of offending has the potential to discriminate against girls, particularly when welfare needs are confused with risk. There is a lack of understanding about the different needs of girls who end up in the criminal justice

¹ Youth Justice Pocket Stats 2019-20 <https://www.cyjma.qld.gov.au/resources/dcsyw/youth-justice/resources/yj-pocket-stats-2019-20.pdf> Youth Justice has published "Pocket Stats" on children in the youth justice system annually for at least the last 10 years but those for 2020-21 are still not available.

² Youth Justice Annual Summary Statistics - detention <https://www.cyjma.qld.gov.au/resources/dcsyw/youth-justice/resources/yj-annual-summary-stats-detention.pdf>

³ Ibid

⁴ Trends in Juvenile Detention in Australia (2011) Richards AIC Trends and Issues no 416

⁵ Youth Justice Pocket Stats 2015-16 to 2019-20

*system, little evidence of what works for girls and few programmes designed specifically for girls.*⁶

Girls tend to be overlooked by research, policy and practice and there is a paucity of published data⁷.

*An important first step for policymakers is to research and identify the background, characteristics and social reintegration needs of girl offenders and to use this to inform legislation and policies in a gender-sensitive way.*⁸

The available data provide information about the complexity of young offenders' lives and situations but no analysis in terms of sex. In the broad, we know that in 2021 in Queensland:

Table 1

Issue	In custody or under supervision order	In custody
Have used at least one substance	78%	84%
Report use of ice or other amphetamines	19%	41%
experienced or been impacted by FDV	51%	60%
Active CP Order	18%	27%
Mental health and/or behav disorder (diagnosed or suspected)	45%	45%
Disengaged from education, training, employment	52%	63%
A parent has spent time in adult custody	31%	40%
Unstable or unsuitable accommodation	32%	42%
FASD (diagnosed or suspected)	8%	14%
Disability (assessed or suspected)	15%	25%
Current or expectant parent	8%	6%

While the risk factors for involvement in offending to date have been found to be broadly similar for males and females, some have been identified as particularly important for girls:

- *a history of childhood abuse or neglect*
- *psychological or mental health issues such as mood and anxiety disorders, and experience of self-harm or attempted suicide*
- *a history of out-of-home care or unstable accommodation*
- *chronic illness or disability*
- *experience of socioeconomic disadvantage*
- *difficulties with school.*⁹

Additionally, YAC's understanding of the data in the Annual Report of the Childrens Court of Queensland 2020-21 is that Indigenous girls now make up 51% of young female offenders¹⁰. As a result, these girls are relatively more overrepresented than their male counterparts. Girls are not a homogenous group and the needs and interests of Aboriginal and/or Torres Strait Islander girls must be separately considered.

Girls tend to come into the criminal justice system because of their vulnerability rather than the severity of their offending¹¹. A particular concern expressed in the research which does exist is an identified tendency to overpredict risk in females. This can result in more intensive and punitive responses which may exacerbate rather than reduce problematic behaviour¹².

⁶ The All Party Parliamentary Group on Women in the Penal System (2012) UK

⁷ Ending Injustice for Girls & Young Women in the Criminal Justice System (2021) Goodfellow University of Bedfordshire UK

⁸ Neglected needs: Girls in the criminal justice system (2014) Penal Reform International

⁹ Girls and young women in the juvenile justice system 2010–11(2012) AIHW Bulletin 107

¹⁰ Annual Report of the Childrens Court of Queensland 2020-21

¹¹ Goodfellow

¹² Bateman, T. (2011) 'Punishing Poverty: The 'Scaled Approach' and Youth Justice Practice, The Howard Journal of Criminal Justice, 50(2), pp. 171-183.

However, the impact of risk factors such as abuse and neglect and serious family problems may be different for girls. Some research has identified that the format of responses needs to be different for girls to boys with the former preferring one-on-one relationships and the latter more structure¹³.

Queensland's Youth Justice Report 2018 noted that understanding the unique needs and practice responses for girls was a 'knowledge gap'. The Youth Justice Strategy which builds on that report, has a picture of a girl on the cover – but does not include any comment on addressing this issue. The Youth Justice Strategy Action Plan 2019-21 includes limited actions which focus on the governmental Youth Justice agency. It would be appropriate, since the agency funds a number of services to address youth offending and work with young offenders, if there was a collaborative, whole of sector approach to understanding the needs of, and providing appropriate responses to, girls, and particularly young Indigenous women. The community agencies working in this area may have important insights and information which would be of value to Youth Justice in its work and practice.

18. What are your experiences and observations of prosecutors and criminal defence lawyers in cases concerning women and girls who are victims of sexual violence or an accused person or offender?

YAC lawyers can find themselves in the situation that they have a child offender as a client and the victim is also a child. Both are likely to be vulnerable because of their age and limited life experience. Both are facing a system which will be challenging to understand. It will seek to re-live actions which may have happened months ago. Children experience time differently to adults. Child offenders may also have suffered trauma: we refer to Table 1 in the previous section.

Lawyers have a duty to their young client. They must hold the prosecution to deliver on its responsibility to prove its case beyond reasonable doubt – and if they are under 14 to meet *the doli incapax* requirements in section 29 of Queensland's Criminal Code. Having a sex offence on their record will have an impact on the rest of the child's life so the consequences are not insignificant.

However, YAC as an organisation and its staff are committed to respecting the rights of all children. In such situations, the lawyers are cognisant of the manner in which they undertake cross-examination of child witnesses with the aim of minimising any distress. It is therefore not appropriate (or indeed necessary) to be aggressive or threatening in demeanour or voice when conducting the defence. The aim must be simply to test the evidence so that the Magistrate, Judge or jury can make the decision as to whether the case against the child offender is proved.

This is not to say that the victim is lying or did not experience what they allege. For example, YAC was acting in a matter of an indecent assault on a young woman walking home from the railway station one afternoon. The assailant was said to be of "African appearance". YAC's client, of African background, was identified as being in the area. However, the CCTV footage showed that he was wearing some quite distinctive clothing which was not mentioned at any time by the victim. Another person who was wearing clothing similar to that described by the victim was seen later by the victim's boyfriend in a park near her home. YAC's client was acquitted. The lawyer had no doubt that the young woman had been assaulted – but not by their client.

28. What factors do victims consider when deciding whether to report to, or seek help from others, such as healthcare providers and other mainstream services?

37. What factors influence a victim of sexual violence to either pursue their complaint through the reporting and investigation stage of the criminal justice system or withdraw their complaint? How is this experience different for Aboriginal and Torres Strait Islander women and women from diverse groups?

Question 37 is complex in relation to those girls who are under 18. This question may never apply to them because they are not given the choice about reporting a sexual offence: adults decide to do

¹³ Girls and young women in the juvenile justice system 2010–11(2012) AIHW Bulletin 107

that without any reference to them. It will also not be for them to decide to withdraw a complaint because they do not want to participate in the proceedings.

The recent changes to the Criminal Code, particularly new section 229BC **Failure to report belief of child sexual offence committed in relation to child**, present a serious barrier to girls being able to seek assistance about being a victim of a sexual offence and to decide what they wish to do in terms of reporting the matter. Staff in agencies such as YAC, for whom consent and confidentiality are fundamental to building trust and providing support, are now required to report to the police under sanction of criminal penalty – as is every adult in Queensland – irrespective of the victim’s wishes. As a report is required ‘as soon as reasonably practicable’, it is not even possible to properly prepare the victim for the potential consequences of such a report being made.

YAC and many other agencies have made submissions to the current Attorney-General in terms of amending the legislation to address this but to date have had no assurances. Essentially, by removing any ability for a young woman to talk about her choices following an assault and understand the consequences of those choices, then it is likely that girls will choose not to talk about the assault at all. This may place the young woman at greater risk, with no safety plan in place and a risk that she may leave home if that is where the abuse is happening, with nowhere safe to go and limited or no support. It is not uncommon for other family members to ostracise the victim, choosing not to believe their allegation and be an additional trauma. Being homeless brings further risks. The result is that children, often girls, may actually be more vulnerable.

This situation was quite unnecessary: the recommendation from the Royal Commission into Institutional Responses to Child Sexual Abuse did not advocate for such a broad ranging position. The main focus was reporting and preventing abuse in **institutional** settings and exempting confessions in religious contexts.

Adults, on the other hand, can choose not to report their sexual abuse as a child even if they have reason to believe that the perpetrator may still be active (provided that they do not receive any information as such that this is the case).

Section 229BC should be reviewed as a matter of urgency.

- 21. How is consent understood in the community and how does this impact behaviour?**
- 38. What impact, if any, have recent amendments to the Criminal Code, including the definition of consent and the mistake of fact excuse, had on police and victim responses?**
- 23. Are current school and community education programs about consent effective? What is working well? What needs to be improved?**
- 50. Should Queensland’s laws on consent be amended again before the impact of amendments recommended by the QLRC can be properly evaluated?**
- 53. What are the risks or benefits of further reform such as the following alternatives? - Redrafting the definition of consent so that consent must be ‘agreed’ rather than ‘given’ - Including a provision that provides a non-exhaustive list of circumstances where consent does not and cannot exist - Removing the ability for a defendant to rely on self-induced intoxication as a reason for having an honest belief as to consent - Amending section 348A(2) to provide that regard must be had (rather than may) to anything the defendant said or did (or did not say or do) to ascertain consent when considering whether they had an honest and reasonable belief about consent?**

The issue of consent is potentially also more complex for children.

YAC has concerns that the QLRC Report, and consequently the amendments to the Criminal Code, did not take into account, nor make any provision for, the challenges faced by both complainants and defendants who are minors/children. There is potential for misunderstanding or miscommunication on the part of one or both in relation to consent or mistake of fact. We further note that, at present, those aged 10 and above are able to be prosecuted for rape and sexual assault.

Government data indicate that in 2019-20:

- 112 males and 2 females aged 10 to 17 were charged with rape
- 324 males and about 36 females were charged with other sexual offences
- 78 males and 348 females aged 0 to 14, and 24 males and 464 females aged 15 to 19, were reported as victims of rape or attempted rape.
- A further 290 males and 1080 females aged 0 to 14, and 90 males and 682 females aged 15-19, were reported as victims of other sexual assault.¹⁴

Adolescence can be a confusing time for children as they go through a key period of emotional, psychological and physical development. This has been, and continues to be, the subject of much research and discussion, especially with the increase in neuroscientific research. Teenagers are dealing with, not only massive hormonal shifts, but also substantial neural changes. These changes come on in great spurts and puberty is one of the most dramatic developmental stages¹⁵. The female brain does not mature until around age 21 while the male brain may take until age 28.

A teenager's hormones affect mood, emotions, and impulses as well as physically. They can become much more interested in sex, sometimes to the point of obsession.¹⁶ They are literally programmed to seek out new experiences, risks and sensations, do not always have a lot of self-control or good judgment and are more prone to risk-taking behaviours, including sexual activity¹⁷.

Detachment from parents, forming more complex peer relationships and first romantic relationships and are key components of development. However,

*... teenagers have not yet reached maturity in either their ability to identify vocal emotions, or to express them. This means that teenagers face quite a challenge in their social spheres: they must interpret poorly expressed cues with immature recognition skills. Understanding how we learn emotional communication skills will be important to help teenagers who struggle socially.*¹⁸

Some children, such as those with Autism Spectrum Disorder, have particular challenges, such as understanding other people's emotions because of the way they scan faces. They might show less concern for others and less ability to comfort others or share emotions. They might misread situations and respond with emotions that are off the mark¹⁹.

Drinking alcohol is a very normalised behaviour in our society. There is a generally unspoken expectation that you will drink and many adults are poor role models in this space. Risk-taking and a lack of consideration of consequences is a normal part of the child's development and maturation process. Alcohol use can be part of that risk-taking or exacerbate risk-taking, leading to further risks. Alcohol contributes to all the leading causes of death for young people: suicide, vehicle accidents, accidental poisoning, and assault²⁰. Of the young Australians aged 14–19 years who are drinking at risky levels, 83% reported being injured as a result of that drinking in the past year²¹.

¹⁴ Queensland Government Statistician's Office, Crime report, Queensland, 2019-20

¹⁵ http://www.nbcnews.com/id/14738243/ns/technology_and_science-science/t/study-teenage-brain-lacks-empathy/#.X2RoGJMzYW8

¹⁶ <https://www.newportacademy.com/resources/empowering-teens/teenage-hormones-and-sexuality/>

¹⁷ <https://raisingchildren.net.au/pre-teens/development/understanding-your-pre-teen/brain-development-teens>

¹⁸ <https://medicalxpress.com/news/2018-08-teenagers-hard-tones-voice.html> Michele Morningstar, the first author on the paper, who conducted the research while completing her Ph.D. in Psychology at McGill University

¹⁹ <https://raisingchildren.net.au/autism/development/social-emotional-development/emotional-development-asd>

²⁰ <https://adf.org.au/talking-about-drugs/parenting/talking-young-people/alcohol-young-people/#:~:text=Alcohol%20contributes%20to%20all%20the,%2C%20accidental%20poisoning%2C%20and%20assault.&text=Of%20the%20young%20Australians%20aged,drinking%20in%20the%20past%20year.>

²¹ Ibid

For some children, drinking is a means to cope with their life circumstances. For example, victims of child sexual abuse have been identified more often among adolescents and adults with alcohol and/or drug-related disorders compared with non-abused populations²².

Heavy drinking can affect memory, learning and social skills in the future²³. As a depressant, alcohol slows down the brain and can lead to poor judgment but also a heightened sense of confidence. In the context of risk-taking and lack of consideration of consequences, this is problematic.

The use of alcohol or other substances may also be relevant:

*Survivors of child sexual abuse are also at greater risk of substance dependencies including not only alcohol but also nicotine dependency (Nelson et al., 2002).*²⁴

YAC is clear that no one should be subjected to unwelcome contact of any kind, particularly sexual assault. It is important that information and education programs for children are well-targeted and evaluated to ensure that children can make good decisions in these situations. This issue might benefit from a well-designed online program which may enable children to deal with this in private. Addressing alcohol use and risks is equally critical. Some of our most vulnerable children are suspended and excluded from school and programs must be available in a range of formats. For those children using alcohol to manage their trauma, therapeutic engagement is similarly critical.

The Parliamentary Committee which reviewed the Bill when it was before Parliament recommended that the Attorney give consideration of the consent and mistake of fact provisions as they apply to youth offenders and the Government agreed to consult further on this point.

In Queensland, children can be involved in domestic violence proceedings where it is an intimate partner relationship. YAC has represented several clients who have been charged with breaching domestic violence orders initiated by the police where the aggrieved was of similar age to the respondent but the aggrieved did not support the bringing or making of a domestic violence order, in particular, an order for no contact. The aggrieved endeavours to continue contact with the respondent but keep it undetected. This results in increased vulnerability for the aggrieved girl as contact with the respondent is hidden and subversive. It has been YACs observation that this “cloak and dagger” activity often brings stressors to contact between the parties which, contrary to the intention of the order, can trigger or exacerbate controlling or violent behaviours.

YAC undertook a 12-month project in 2020-21 to identify issues and responses for children under 18 involved in the domestic violence system as aggrieved and respondent and has advocated for the ongoing funding for specialist youth domestic violence legal and social welfare services to assist those under the age 18 to address the complexity of this issue. To date, funding has not been secured.

25. Is the current approach in Queensland to the non-consensual sharing of intimate images striking the right balance between criminalising non-consensual behaviour and community education?

We refer to comments we have made earlier about child and youth development. The provisions in relation to relating to ‘sexting’ introduced into the Criminal Code in 2005 were intended to protect children from predatory adult behaviour but they have been used against children.

YAC has had cases where adolescent girls particularly have sent pictures of themselves to boyfriends which resulted in both being prosecuted: the girl for distributing child pornography and the male for having it on his phone even though it was sent to him.

²² <https://aifs.gov.au/cfca/publications/long-term-effects-child-sexual-abuse/behavioural-aspects-mental-health-functioning>

²³ Alcohol and Adolescent Development Fact Sheet
<https://www.education.vic.gov.au/documents/school/teachers/health/factsheet12011.pdf>

²⁴ <https://aifs.gov.au/cfca/publications/long-term-effects-child-sexual-abuse/behavioural-aspects-mental-health-functioning>

In another case, an adolescent girl with an intellectual impairment was sending pictures of herself to a male who clearly was an adult and knew that she was not. Her mother went to Child Safety to ask how she might stop this man from contacting her daughter. They advised she talk to the police. The police charged the daughter with distributing child pornography.

While sending such pictures is unwise, it should not be criminalised in this situation. An 18-year-old sending a similar image of themselves to another 18-year-old is not breaking any laws. Children would have no idea, and it is perverse, that they could be breaking the law by simply following this behaviour. YAC has previously sought amendment of the legislation to preclude prosecution where the person is distributing pictures of themselves, as is the case in Victoria. Whilst YAC sees fewer of these cases than in the past, it would be preferable for the law to be amended to ensure that children cannot be prosecuted in this situation.

On a related issue, children are facing charges around the production, and distribution of child exploitation material when they film and share an incident of violence amongst their peers (that is, to other children). Police allege the filming of a fight, and therefore an assault or series of assaults falls within the definition of “child exploitation material” in S207A of the Criminal Code that pertains to a person under 16 being subjected to “abuse, cruelty or torture”. Whilst there is no apparent reason, it is YAC’s experience that girls are charged in this situation with much greater frequency than boys. It could be speculated this may be because boys may be more likely to involve themselves in the act of violence than to film the event.

YAC believes charging girls with child exploitation offences in this situation is inconsistent with the purpose for which the offences were introduced and misconstrues the nature of the behaviour. Whilst such charges are not frequent, they occur with sufficient regularity (and as recently as this month) for YAC to raise concerns about the practice.

YAC understands that charges brought for child exploitation offences are relevant to an application for a working with children suitability check even if the charges are not pursued. This could have a significant and long-term impact. The definition of “child exploitation material” should be read in the context in which it appears in the Criminal Code, that is, in Division 22 headed “Offences against Morality”. All other offences contained within that division pertain to child pornography or child sex offences. It is also not in line with the expressed legislative intent. The Explanatory Notes and the second reading speech when the provisions were introduced only refer to “addressing child pornography” and “being tough on child sex offences”.

Whilst YAC has been successful on a number of occasions in having these charges withdrawn, it would be preferable for this to be addressed legislatively to prevent what we believe to be a misuse of these provisions.

72. How can trauma-informed approaches be better embedded in court processes in Queensland to improve the experiences of victims of sexual offences? What works? What needs to be improved?

Most children who are involved in the Youth Justice system report exposure to some type of traumatic event. Literature indicates that continued exposure to trauma for young people can alter psychological development, increase the likelihood of engagement in high-risk behaviours, low academic performance, and difficulty sustaining relationships²⁵. Being the victim of sexual offences is traumatic. Sometimes this trauma is linked to future behavioural difficulties including offending.

Trauma-informed practice requires the delivery of services with a unified awareness of a person’s past and current experiences of abuse, an understanding of the neurological effects of trauma on

²⁵ Knoche, V. A. et al. (2018) Trauma-Informed: Dependency Court Personnel’s Understanding of Trauma and Perceptions of Court Policies, Practices, and Environment. Journal of child & adolescent trauma. [Online]

parents and YP and the coping strategies they develop, and a commitment to promote healing from trauma to avoid re-traumatising clients²⁶.

Police investigations and court processes are likely to be an additional trauma in themselves as well as re-traumatising in terms of past events. For effective trauma-informed approaches to be embedded within the court space, all staff engaging with victims of sexual violence must be adequately trained in trauma-informed practices. Courts have a moral and ethical responsibility to deliver accessible, culturally relevant, and effective services to individuals from historically oppressed backgrounds²⁷. This includes a comprehensive understanding of the key principles underpinning trauma-informed practice, which include safety, trust and transparency, peer support, collaboration and mutuality, empowerment, and recognition of cultural, historical and gender issues²⁸.

It is important to acknowledge that every person's trauma experience is different, and this requires workers with children to adequately adapt their practice to the range of diverse circumstances that present in relation to sexual abuse. Victimisation and offending patterns tend to differ based on gender²⁹. Gender responsiveness is an important aspect of trauma-informed practice.

As noted previously, girls are not a homogenous group. Trauma-informed service delivery approaches should ensure that they are inclusive of girls and women across the spectrum of sexual characteristics, sexual orientation and gender diversity, cultural diversity and their individual health and psychosocial needs³⁰. It is noted though that this discussion is continuing primarily in a binary context which may not therefore be appropriately inclusive.

67. Should restorative justice approaches for sexual offences be expanded in Queensland

This has been an ongoing discussion. Holding a conference must always depend on the individual victim and individual offender and the particular circumstances of the offence. For children, it may be more appropriate than court proceedings as it is an opportunity for them to understand the implications of their actions and the importance of consent. However, it may well need to be supported by therapeutic intervention for survivor and perpetrator.

However, there are many situations where the victim would find it far too difficult to participate. It may be that the situation could still be better resolved through someone standing in for the victim who can help the offender understand the impact of their behaviour.

Alternatively, there could be a restorative justice order which involved therapeutic intervention and learning without a conference. There should be specialist training for facilitators running restorative justice processes for matters involving sexual offences.

The Griffith Youth Forensic Service (GYFS) is part of a broader program of research and practice at Griffith University concerned with understanding and preventing sexual violence and abuse. It provides specialist forensic psychological assessment and treatment services, on a state-wide basis, to youth who are sentenced in courts in relation to sexual offence matters. It is a partner with ANROWS in a project on the adverse childhood experiences and the intergenerational transmission of domestic and family violence in young people who engage in harmful sexual behaviour and violence against women. It is intended that this work will inform ongoing prevention and intervention efforts to address engagement in harmful sexual behaviours and sexual violence within the policy and service sectors. The importance of prevention and early intervention cannot be

²⁶ McKenna, N. C. & Holtfreter, K. (2021) Trauma-Informed Courts: A Review and Integration of Justice Perspectives and Gender Responsiveness. *Journal of aggression, maltreatment & trauma* [online]

²⁷ Antebi-Gruszka, & Scheer, J. R. (2021). Associations Between Trauma-Informed Care Components and Multiple Health and Psychosocial Risks Among LGBTQ Survivors of Intimate Partner Violence. *Journal of Mental Health Counseling*, <https://doi.org/10.17744/mehc.43.2.04>

²⁸ McKenna & Holtfreter, 2021

²⁹ Scheer, & Poteat, V. P. (2021). Trauma-Informed Care and Health Among LGBTQ Intimate Partner Violence Survivors. *Journal of Interpersonal Violence*. <https://doi.org/10.1177/0886260518820688>

³⁰ Antebi-Gruszka & Scheer 2021

underestimated in light of the significant trauma involved in domestic and family violence and sexual offences – but also the basic right of girls and women to live in a society where they feel safe.