

## Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025

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# **Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025**

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## About The Salvation Army

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The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:

<https://www.salvationarmy.org.au/>





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## Our commitment to inclusion

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The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQA+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQA+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQA+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <[salvationarmy.org.au/about-us](https://salvationarmy.org.au/about-us)>





## Executive summary

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The Salvation Army welcomes the opportunity to provide this submission to the Education, Arts and Communities Committee (the Committee) in relation to the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025 (the Bill).

The Salvation Army operates family and domestic violence specialist services in every state and the Northern Territory. This support includes refuges, children's and parenting services, counselling, men's programs, accommodation, and advice and referral. It is from the experiences of our clients, as well as those of our frontline staff, that we have approached this submission.

The Salvation Army welcomes the intention of the Bill to improve productivity for operational police when responding to family and domestic violence, and to give victim-survivors immediate protections against persons using violence. We caution however, that the legislative reforms and responses alone will not achieve sustainable outcomes for victim-survivors, persons using violence, or police. We press that this Bill must be accompanied by significant systemic investment and reform to achieve its desired goals.

This submission contains some of The Salvation Army's initial recommendations that we believe will strengthen the Bills proposed legislative reforms, and work to adequately protect victim-survivors, hold persons using violence accountable, and reduce family and domestic violence in Queensland.

This submission covers:

- Preventing the misidentification of victim-survivors as persons using violence;
- Ensuring a well-informed family and domestic violence sector;
- Investing in accountability and behaviour change for persons using violence; and
- Promoting integration between justice and family and domestic violence responses.

The Salvation Army has made **five** recommendations for the Committee to consider. A summary of these recommendations follows on the next page.



# Summary of recommendations

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## Recommendation 1

1.8 The Salvation Army recommends that the Queensland Government invest in reducing misidentification in instances of family and domestic violence. This should include investing in:

- *Specialist training for police and justice staff on family and domestic violence as a pattern of behaviours. This training should be targeted, mandated and repeated regularly; and*
- *Co-responder models to support a reduction in misidentification through improved information and skill sharing.*

## Recommendation 2

2.4 The Salvation Army recommends that the Queensland Government provide training and resources to specialist family and domestic violence services to ensure they understand changes to the legislation and subsequent justice responses.

## Recommendation 3

2.6 The Salvation Army recommends that the Queensland Government ensure victim-survivors have easy access to information on the changes to legislation and legal responses, and where to seek support. These resources should be available in different languages.

## Recommendation 4

3.6 The Salvation Army recommends that the Queensland Government invest in the availability and development of a broad range of programs to support behaviour change and accountability for persons using violence.

## Recommendation 5

4.5 The Salvation Army recommends that the Queensland Government increase investment in integration between justice and specialist family and domestic violence services in all regions across the state.

# 1 Preventing the misidentification of parties

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- 1.1 Ensuring that police and judicial responses have a clear understanding of the person most in need of protection in family and domestic violence matters is critical to the effectiveness of the reforms presented in the Bill.
- 1.2 The Salvation Army welcomes the intention of the Bill in providing victim-survivors with immediate protections against persons using violence through measures including police protection directions (PPDs) and an electronic monitoring pilot. We point to the fact however that our Queensland services continue to report a high number of victim-survivors being misidentified as the perpetrator, which impacts their trust in the police and contributes to reluctance to report further instances of violence. See examples below.

## Jane's Story\*

Jane had been in a relationship for over 20 years, and was experiencing ongoing perpetration by her partner John. One night, John strangled Jane and pushed her against a wall. Jane decided she needed to leave and took up residence at another location. John proceeded to call Jane over 1,000 times and sent confronting messages indicating he knew her location.

Jane later returned home thinking John would be at work, however he was at the residence. John stood over her, and spoke a tirade of abuse in her ear, resulting in Jane becoming increasingly distressed.

The police were called and four male officers attended. They insinuated Jane would not return to the residence if she was scared and proceeded to interview Jane while she sat on the ground and the officers stood around her in a circle. When they interviewed John, they stood beside him, introduced themselves, and stated "what has she done mate."

The police spoke with John who presented himself as calm and collected, and subsequently named Jane as the respondent in the Domestic Violence Order (DVO), and John as the aggrieved. In the lead up to the Domestic Violence Order being put in place, John had completed multiple crime stopper reports relating to Jane and had used systems to abuse and manipulate the way police viewed her.

The Vulnerable Persons Unit became involved and supported Jane, however, all her statements implicated her in breach of an existing DVO as there was no consent for the contact, or she had used response violence. As such, no DVO or charges were pursued against John despite his ongoing physical and financial abuse, stalking and utilising systems to abuse Jane.

Now, Jane lives as the respondent in a five-year DVO, and as a result she has lost her employment, accommodation, and license.

*\*Names changed*

### Zoe's Story\*

Zoe was referred to our family and domestic violence services after she had contacted the police multiple times for assistance. The police reported that they believed she was 'having an affair' and suffering 'post-natal depression.'

Zoe engaged with our family and domestic violence service, and disclosed significant perpetration of violence towards herself and her two young children. With the advocacy and support of our specialist services, Zoe engaged with police and their views on her situation changed. Police then identified Zoe as the person most in need of protection and intended to pursue a DVO with full conditions. The duty sergeant then reported that they received a phone call from the respondent who was concerned about his children. The respondent stated that Zoe was having an affair and was an alcoholic.

The DVO was then downgraded to good behaviour only. The respondent went on to breach the good behaviour conditions six times before the DVO went to court. Following the six breaches, a DVO with full conditions was put in place protecting Zoe and her two children.

\*Names changed

- 1.3 Treating victim-survivors of violence as perpetrators not only undermines confidence in the legal system and justice response, but it also denies victim-survivors appropriate support.<sup>1</sup>
- 1.4 Police and justice staff play a crucial role in supporting the safety of victim-survivors and holding persons using violence accountable. We acknowledge that police officers will be prevented from issuing PPDs if the person in most need of protection cannot be identified, but we do not believe that this alone will be sufficient to prevent misidentification. Police and justice staff need to have the knowledge and skills to identify and respond appropriately to all forms of violence, and to correctly interpret instances of violence and patterns of behaviour.
- 1.5 We believe that specialist training for police and judicial staff is critical. Training must focus on family and domestic violence as a pattern of behaviours as opposed to a one-off instance of violence. Any training that aims to reduce misidentification must also include ensuring there is an understanding of the neo-colonial context of violence, particularly in relation to Aboriginal and Torres Strait Islander victim-survivors' violent resistance and reluctance to cooperate with police during investigations.
- 1.6 We also point to the benefit of investing in co-responder models in reducing misidentification and improving productivity for operational police officers when responding to family and domestic violence. We welcome and support the expansion of family and domestic violence practitioners within police stations across Queensland. Our services however continue to see victim-survivors that do not feel safe reporting to police.

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<sup>1</sup> Nancarrow, H, Thomas, K, Ringland, V & Tanya, M. (2020). *Accurately identifying the 'person most in need of protection' in domestic and family violence law*. Australia's National Research Organisation for Women's Safety.  
<https://20ian81kynqg38bl3l3eh8bfwpenqine.netdna-ssl.com/wp-content/uploads/2019/10/Nancarrow-PMINOP-RR.3.pdf>.

- 1.7 Embedding family and domestic violence specialists within police units, who empower, advocate for, and refer victim-survivors to services, only assists with recognition and identification of persons in most need of protection from family and domestic violence, whilst also benefitting police. We draw attention to the Alexis Family Violence Response Model and recommend resources available to roll out a similar program in Queensland.

### Alexis Family Violence Response Model (Alexis)

Established in 2014, Alexis is a partnership between The Salvation Army and Victoria Police, targeting serious-risk and repeat family violence cases. Alexis creates a multi-disciplinary integrated response team by embedding specialist key workers with family and domestic violence expert knowledge within a targeted police family and domestic violence unit. Specialist workers aim to:

- Strengthen integration between police and services,
- Reduce the incidences of police attendance where there is a history of recidivism,
- Prevent escalation of risk to women and children by intervening early, and
- Promote successful and ongoing engagement in mainstream services.

Specialist workers simultaneously engage victim-survivors and persons using violence, promoting a trauma-informed approach that provides immediate support, builds trust between victim-survivors and police, and supports offenders to address their behaviour. The embedded model allows for the sharing of relevant information freely, leading to greater capacity for proactive risk management, and allowing police to leverage specialist knowledge and expertise to identify and address risk factors immediately. This has led to greater referral update, and a reduction in family and domestic violence risk.

An evaluation of the Alexis model in 2017 found that it resulted in an 85 per cent reduction in police callouts in the 12 months following exit from the program.<sup>2</sup>

The Alexis model has also led to significant benefits for police including:

- **Professional development**, strengthening justice responses, and providing greater clarity on the complexity involved in addressing family and domestic violence.
- **Enhanced policing**. The presence of specialist workers allows police to focus on the policing elements of incidents, reducing frustration and increasing hope for achieving positive outcomes with priority families;
- **Improved accountability** for persons using violence due to police members' improved ability to produce quality and comprehensive court briefs; and
- **Proactive policing**. Alexis represents a form of proactive, intelligence-led policing that removes the responsibility from the victim-survivors to seek help, placing the onus on the state to act and support the victim-survivors and their children.

The success of the program is also seen in the mental health benefits it provides police including reduced stress, improved job satisfaction and enhanced emotional resilience.

<sup>2</sup> Harris, L., Powell, A. & Hamilton, G. (2017, August). Alexis – Family Violence Response Model. School of Global, Urban and Social Studies RMIT University. [https://www.sarmy.org.au/Global/SArmy/Social/vsppu/Resources/SALV0006\\_Alexis%20Report\\_Online.pdf](https://www.sarmy.org.au/Global/SArmy/Social/vsppu/Resources/SALV0006_Alexis%20Report_Online.pdf).



## **Recommendation 1**

**1.8 The Salvation Army recommends that the Queensland Government invest in reducing misidentification in instances of family and domestic violence. This should include investing in:**

- **Specialist training for police and justice staff on family and domestic violence as a pattern of behaviours. This training should be targeted, mandated and repeated regularly; and**
- **Co-responder models to support a reduction in misidentification through improved information and skill sharing.**

## 2 Ensuring a well-informed service sector

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- 2.1 The Salvation Army press the need to ensure that the wider family and domestic violence sector is well informed regarding changes outlined in the Bill.
- 2.2 To promote best outcomes for victim-survivors accessing family and domestic violence specialist services, it is vital that practitioners are well equipped to accurately interpret and understand the legislative changes proposed in the Bill.
- 2.3 We advocate for resources and training on legislative changes and legal responses to the specialist family violence sector prior to the implementation of the Bill. Training should be available ongoing and include but not be limited to:
- How changes will be implemented in justice responses to family and domestic violence;
  - The role and what is expected of specialist services under the new legislation;
  - How mechanisms introduced under the legislation - such as PPDs and the electronic monitoring pilot – will work, where they will be recognised, what will occur in the event of breaches and how to support requested variations and reviews;
  - How PPDs in particular will impact victim-survivors or persons using violence who are not Australian residents, or who are moving through immigration processes; and
  - Pathways for specialist services to raise concerns related to misidentification if they arise.

### Recommendation 2

- 2.4 The Salvation Army recommends that the Queensland Government provide training and resources to specialist family and domestic violence services to ensure they understand changes to the legislation and subsequent justice responses.**

- 2.5 We also suggest the need for educational materials and information for victim-survivors that outline the changes to legislation and subsequent legal responses, and where to seek support. This will ensure victim-survivors are empowered to seek help and engage with police, child protection, legal systems, and family and domestic violence services effectively. Resources must be easily accessible and available in different languages.

### Recommendation 3

- 2.6 The Salvation Army recommends that the Queensland Government ensure victim-survivors have easy access to information on the changes to legislation and legal responses, and where to seek support. These resources should be available in different languages.**

### 3 Investing in accountability and behaviour change for persons using violence

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- 3.1 The Salvation Army believes that the changes discussed in the Bill will be ineffective in ending family and domestic violence without significant investment in accountability and behaviour change outside of the justice system.
- 3.2 In our experience, the availability of behaviour change programs differs according to location. Our frontline services report that waiting periods to access behaviour change programs are long – particularly in regional and remote areas of Queensland, and that there are no other options for immediate service linkage, continuity of services following engagement in behaviour change programs, or accountability measures for persons using violence on bail following sentencing. This only increases risk for victim-survivors.
- 3.3 We press the need for increased investment to ensure behaviour change programs are available in a timely manner whenever a person using violence encounters the justice system.
- 3.4 In our experience however, behaviour change programs are only one part of the solution. The needs of persons using violence are not homogenous, and we therefore believe that no single time-limited program will meet the needs or see significant outcomes for all persons using violence. Behaviour change programs must be complemented by intensive, integrated, and ongoing accountability and support mechanisms to best engage persons using violence. Key to this is the development of a broad range of serious risk programs and service options, which are not limited by time or jurisdiction, to engage persons at high risk of reoffending or who are in custody for family and domestic violence offences.
- 3.5 For example, The Salvation Army in Victoria delivers a range of programs to support men who use violence and are seeking to change their behaviour. These include Men’s Behaviour Change, Post Participation Support, Men’s Family Violence Case Management, and the Alexis Family Violence Response Model. Our programs support men to take responsibility for their actions, understand the impact of their behaviour, and develop safe, respectful relationships with their families and children. At the core of all our interventions for persons using violence is a focus on victim-survivor safety. Our goal is to reduce violence and support lasting change through timely, accountable, and respectful engagement with those who use violence. There are currently limited service options for persons using violence in Queensland.

#### Recommendation 4

- 3.6 The Salvation Army recommends that the Queensland Government invest in the availability and development of a broad range of programs to support behaviour change and accountability for persons using violence.**



## 4 Promoting integration between justice and family and domestic violence responses

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- 4.1 We believe that the Bills reforms must be complimented by strengthened collaboration and partnership between the justice system and specialist service sector to ensure best outcomes for those impacted by family and domestic violence.
- 4.2 In our experience, service integration between family and domestic violence services and police and justice responses is inconsistent across Queensland. When it comes to police and justice interventions, victim-survivors often receive limited intentional communication. In addition to this causing further anxiety in an already stressful and emotional period, a lack of updated and timely information can make it difficult for specialist family and domestic violence services when it comes to knowing how to best support victim-survivors during this time.
- 4.3 Critical to this is improved information sharing and coordination between justice and family and domestic violence services which not only ensures effective identification, assessment and management of risk to victim-survivors, but allows our services to implement supports paramount to ensuring victim-survivor safety and wellbeing.
- 4.4 We reiterate the benefits we have seen service integration provide in other jurisdictions in regard to victim-survivor safety, perpetrator accountability, and to police, as seen in our Alexis Family Violence Response model (see [chapter 1](#)).

### Recommendation 5

- 4.5 The Salvation Army recommends that the Queensland Government increase investment in integration between justice and specialist family and domestic violence services in all regions across the state.**

## 5 Conclusion

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- 5.1 The Salvation Army thanks the Education, Arts and Communities Committee for the opportunity to provide a written submission to the Bill.
- 5.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from [REDACTED].

**The Salvation Army Australia Territory**

**May 2025**

