

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

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29 May 2025

Committee Secretary Education,  
Arts and Communities Committee  
Parliament House  
George Street  
Brisbane QLD 4000

By online submission: [EACC - Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025 - Submission](#)

**RE: Domestic and Family Violence Protection and Other Legislation  
Amendment Bill 2025 ('the Bill')**

The Red Rose Foundation welcomes the opportunity to provide a submission to the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025 Inquiry ('the Inquiry').

Urgent and comprehensive action is needed to address domestic and family violence, and we commend the Queensland Government's commitment to working with stakeholders to ensure the systems we design are responsive and meet the needs of victims of domestic and family violence (DFV).

In recognition of the significance of this Inquiry, we convened a special roundtable with service users to discuss the proposed amendments. Our aim was to amplify their voices and ensure our response is grounded in the lived experiences of DFV victim-survivors. The insights and feedback shared during this session have been woven throughout our submission under the relevant headings, providing a direct link between policy analysis and the realities faced by those most affected.

We extend our sincere gratitude to these victim-survivors for their time and the invaluable expertise they contributed. Their willingness to share personal experiences has powerfully shaped our response, ensuring that the lived-experience perspective is at the forefront of our advocacy.

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## Organisational Details

The Red Rose Foundation Australia is a national not for profit organisation focused on improving responses to high risk, high harm domestic and family violence and preventing fatal domestic abuse. We seek to address systemic, cross-sectoral gaps through training, education, awareness raising and research as well as the provision of long-term support to women who have experienced non-lethal strangulation. Our service is unique to Australia, and we know of no other such service worldwide.

Our Board of Directors includes sector management and legal professionals, violence prevention consultants and researchers who have vast experience and expertise in domestic, family and sexual violence. Our direct client service is undertaken by a small team of highly qualified counsellors. We are supported by our Patron, Her Excellency the Honourable Dr Jeannette Young AC PSM, Governor of Queensland and our First Nations Advisory Committee, who provide direction and guidance on the issues that matter most to First Nations women experiencing domestic and family violence.

The Red Rose Foundation has partnered with the Training Institute for Strangulation Prevention USA, which is their first partnership outside the USA. Through our international partnership we have joined the International Alliance of Strangulation Educators and Researchers which includes Dr Jacquelyn Campbell who has led the way with research and education on high-risk domestic violence. The Red Rose Foundation has also partnered with Central Queensland University to provide groundbreaking research on the health impact and long terms consequences for victims of non-lethal strangulation.

The Red Rose Foundation maintains strategic partnerships with a range of government agencies, non-government organisations and academic institutions including domestic, family and sexual violence counselling and crisis services, refuges, family support, and child protection agencies. We adopt an intersectional, trauma-informed and feminist approach to all aspects of our work, which is informed by the voices of people with a lived experience of high risk, high harm domestic and family violence.

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## Summary Position

The Red Rose Foundation supports the Inquiry's goals to examine proposed amendments to the Domestic and Family Violence Prevention Act 2012 (Qld) ('DFVP Act') and the Evidence Act 1977 (Qld) ('Evidence Act') to assess whether these proposed legislative changes effectively balance police operational efficiency with victim-survivor safety and rights.

The inquiry is considering these legislative amendments against the backdrop of the Queensland Police Service being "under significant strain due to increasing demand across all crime types, exacerbated by the evolving and

complex nature of domestic and family violence". The proposed reforms are intended to "improve productivity for operational police officers when responding to DFV," while also aiming to provide "victim survivors immediate protections against respondents"<sup>1</sup>.

The QPS efficiency-focused rationale for this amendment represents a departure from the central objective of Queensland's domestic and family violence laws in recent years, which has been to prioritise the safety, protection, and wellbeing of victim-survivors of DFV. Changes to Domestic and Family Violence (DFV) legislation should reflect recommendations made by the Women's Safety and Justice Taskforce, and changes must prioritise and centre the safety and wellbeing of victim-survivors of DFV.

Whilst we support the appropriate use of video-recorded evidence-in-chief (VREC), which can reduce the need for victims to repeatedly recount traumatic experiences, we do not support the creation of police protection directions (PPDs). Our reasons for opposing PPDs are detailed below.

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## The Scale and Complexity of Addressing Domestic and Family Violence

Violence against women is a national crisis<sup>2</sup>.

Amanda Camm MP, Minister for Families, Seniors and Disability Services and Minister for Child Safety and the Prevention of Domestic and Family Violence, has championed urgent, system-wide reform to address Queensland's domestic and family violence crisis, described as an epidemic<sup>3</sup>:

"Everyone has a role in raising awareness for domestic and family violence in our community and we have an incredible opportunity to better understand demand and ensure the systems we design are responsive and meeting the needs of victims."<sup>4</sup>.

Last year, Queensland recorded 69,528 breaches of domestic violence protection orders, the highest number recorded in at least two decades<sup>5</sup>. Between 2012 and 2024, the number of requests for assistance with domestic and family violence incidents received by the Queensland Police Service more than tripled, rising from approximately 60,000 to over 192,000<sup>6</sup>. This is particularly alarming as around 80 percent of women do not report domestic violence perpetrated by a current partner<sup>7</sup>. The true prevalence of DFV in

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<sup>1</sup> <https://www.legislation.qld.gov.au/view/pdf/bill.first.exp/bill-2025-024>

<sup>2</sup> <https://ministers.dss.gov.au/media-releases/14901>

<sup>3</sup> <https://bundabergtoday.com.au/the-road-to-respect/2025/02/12/minister-camm-wanting-to-bring-dfv-stories-out-of-the-dark/>

<sup>4</sup> <https://www.insidestategovernment.com.au/queensland-family-violence-working-group-established/>

<sup>5</sup> <https://mypolice.qld.gov.au/queensland-crime-statistics/>

<sup>6</sup> <https://statements.qld.gov.au/statements/102332>

<sup>7</sup> <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/how-do-people-respond-to-fdsv>.

Australia is significantly under-reported, and the scale of the crisis is likely much greater than official statistics indicate.

First Nations women experience violence at a significantly higher rate<sup>8</sup>. Aboriginal and Torres Strait Islander women are 11 times more likely to be killed by family violence and 32 times more likely to be hospitalised as a result of violence<sup>9</sup>.

Domestic and Family Violence (DFV) is a complex issue which requires a whole-system, community-wide response. The Red Rose Foundation's position is that *everyone* has a role in raising awareness of domestic and family violence and that every point of interaction with a victim-survivor of DFV is an opportunity for intervention. This requires a multi-agency, multi-level response to DFV, where we do not rely solely on the Police and the Courts to prevent DFV once risk and harm levels have escalated to a point of crisis.

We continue to advocate for a Domestic and Sexual Violence Commissioner to co-develop and oversee a system-wide reform in the response to Domestic, Family and Sexual Violence (DFSVM) across Queensland, in consultation with specialists in the DFSVM sector and with victim-survivors. We note that the QPS has an Assistant Commissioner for its Domestic, Family Violence and Vulnerable Persons Command and DFV Prevention is a discrete Ministerial portfolio for successive governments. However, the need remains for someone in authority, dedicated to DFV, to provide a single focus point and high-level support in the Statewide effort to eliminate all forms of DFV. Ideally such a person would be in an independent role like the Victims' Commissioner; but in the alternative a DFV Commissioner or a Deputy Commissioner for DFV attached to the Victims' Commissioner's Office: a position noted and supported by the Queensland Police Union's in its Blueprint for Change<sup>10</sup>.

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<sup>8</sup> <https://www.dss.gov.au/national-plan-end-gender-based-violence>.

<sup>9</sup> <https://www.ourwatch.org.au/news/opinion-the-long-tail-of-colonisation>.

<sup>10</sup> <https://www.qpu.asn.au/uploads/QPU%20BlueprintForActionDFVFinal.pdf>. Page 7.



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## Response to the proposed introduction of Police Protection Directives.

The following outlines the Red Rose Foundation's overall position opposing the proposed introduction of police protection directives (PPDs).

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### 1. Legislative Amendments Driven by Police Workload Reduction

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The implementation of Police Protection Directives (PPDs) is driven by a desire to reduce police workloads, rather than centering the needs and safety of victim-survivors.

This focus on operational efficiency is reflected in the rationale provided by Queensland Police Union President Shane Prior, who when advocating for the model that led to PPDs, noted that police resources are being stretched by domestic and family violence (DFV) work, to the detriment of what he described as "core" policing duties such as proactive community patrols:

"Our police are doing so much domestic and family violence, we are not getting to the core work, police work which is out on the road proactively patrolling the community. It's a problem.<sup>11</sup>"

Feedback from recent Red Rose Foundation roundtable attendees underscores deep concern that the proposed PPD model is not designed to make victims safer. Participants unanimously rejected the model, expressing that PPDs would not increase their safety compared to existing Police Protection Notices (PPNs), and could in fact retraumatise victims and increase their vulnerability. One participant noted, *"I don't see how PPDs will make victims safer than with PPNs?"* while another added, *"I think it's going to be a lot worse for victims"*

Participants also felt they had been denied a thoughtful and collaborative consultation process, describing the reforms as rushed and lacking genuine engagement with victim-survivors: *"We're just being told, we weren't asked what we think, we've just been given a matter of days to consider a complex option that feels like a done deal"*. Another one said, *"I feel it's a slap in the face to the work we did with the Taskforce<sup>12</sup> and all the brave victims who've come forward to share their stories ... listening to their voices and turning their recommendations into actions."*

The Red Rose Foundation and sector partners maintain that any reform in this space must be driven by a genuine commitment to victim-survivor safety and wellbeing, not by a desire to streamline police workloads or administrative convenience. The current proposal, as articulated in government documentation, prioritises operational efficiency and risks undermining hard-won advances in the statewide domestic and family violence response.

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<sup>11</sup> <https://www.4bc.com.au/podcast/exclusive-major-domestic-violence-reforms-to-change-the-way-police-deal-with-offenders/>

<sup>12</sup> Women's Safety and Justice Taskforce

## **2. Existing Provision for Immediate Police Protection**

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The Explanatory Memorandum and various media reports claim that Police Protection Directions (PPDs) will equip the Queensland Police Service (QPS) with an additional mechanism to respond urgently to DFV, helping them manage rising demand and align with community expectations.

However, QPS already has the capacity to secure immediate protection for victim-survivors using existing legislative tools, such as Police Protection Notices (PPNs) and temporary protection orders, which calls into question the necessity of new tools focused on urgency and immediacy.

Under current legislation, police can issue a PPN when they reasonably believe domestic or family violence has occurred or is imminent. PPNs provide immediate protection by imposing conditions such as no contact, exclusion from the home, and restrictions on approaching certain locations. These notices remain in effect until the matter is heard in court, ensuring that victim-survivors are protected from the moment police intervene through to judicial consideration.

Feedback from the Red Rose Foundation's roundtable with victim-survivors further underscores this point. As noted earlier, participants unanimously rejected the PPD model, questioning its added value and its ability to make victims safer:

"I don't see how PPDs will make victims safer than with PPNs?"

"There's your bit of paper, that's it... Perpetrators don't even take notice of court ordered PPNs and are constantly breaching... I've seen it time and time again, the police don't want the hassle"

In summary, the existing legislative framework already provides police with robust tools for immediate protection. The proposed PPDs do not address an identified gap in urgent response, but instead introduce additional complexity, risk, and administrative burden—without clear evidence that they will improve safety or outcomes for victim-survivors.

## **3. Potential Overreach of Police Authority**

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"It's making the police officer, the lawyer. That's not their job."

Victim-Survivor of DFV and Participant in PPD review roundtable, May 2025

Concerns about the power imbalance were echoed throughout the Red Rose Foundation's recent victim-survivor roundtable, with one participant stating, "I don't think we should be giving them any more power," and another noting, "I was too scared to put in a complaint against the Police because of the power they have. I'd be even more scared with Police having PPD powers". This fear of reprisal or negative consequences if police are given expanded authority is a significant barrier to accountability and trust in the system.

The Queensland Council for Civil Liberties (QCCL) has similarly opposed the legislation, warning that “issuing an order of protection has the power to fundamentally undermine a person's rights and liberty, such decisions should be made by a judicial officer. There is a danger of the police failing to understand their role as ‘law enforcers’ as opposed to ‘law appliers and makers’”<sup>13</sup>.

To date, we have seen no evidence of improvements following the Commission of Inquiry into Queensland Police Service responses to DFV which found significant evidence of cultural issues such as misogyny, sexism, and racism within the QPS<sup>14</sup>. As of 30 May 2025, the Fourth Progress Report (March 2024) is the most current publicly available update. The latest report details process measures, such as the establishment of new policies, training programs, and governance structures, but does not provide outcome data or independent evaluation results that would show whether these changes have led to improved experiences or safety for victim-survivors, or more effective police responses to DFV overall. In summary, while the report documents implementation activity, it does not present substantive evidence or evaluation of the effectiveness of these reforms in practice. Yet, we are being asked to trust the police with these additional powers.

Entrusting police with greater authority through PPDs, without demonstrated improvements in responses to DFV, risks further undermining victim-survivor confidence in the system and risks compromising safety and justice outcomes.

#### **4. Increased Complexity for Victims of Domestic and Family Violence**

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The introduction of Police Protection Directions (PPDs) will significantly increase the complexity faced by victim-survivors of DFV, making the system harder to navigate and potentially less safe.

Appealing a PPD or seeking a variation to extend protection beyond the initial 12-month period will be particularly challenging, especially for those already experiencing trauma. As one roundtable participant explained, “When you’re suffering PTSD<sup>15</sup>, you’re not going to progress additional orders... you just don’t realise how bad it is until you’re out of it, which takes more than 28 days”.

Legal services are not universally accessible or available, meaning many victim-survivors will be forced to act for themselves in complex legal proceedings, or face the burden of paying privately for representation or seeking limited legal aid support. The process of contesting or extending a PPD involves multiple steps, including potential internal police reviews and court reviews, each requiring detailed documentation and legal argument - tasks

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<sup>13</sup> <https://qccl.org.au/newsblog/qccl-opposes-police-protection-directions>

<sup>14</sup> <https://www.qpsdfvinquiry.qld.gov.au/about/assets/commission-of-inquiry-dpsdfv-report.pdf>

<sup>15</sup> Post Traumatic Stress Disorder.



that are daunting – and sometimes dangerous - for those already in crisis. For others, these options are simply not within reach.

As one participant noted, “This sounds like it will be retraumatising to the victim when a perpetrator appeals to both the police and then to the court. They’ll have to keep track of the appeals whilst also trying to keep safe. No-one wants to go through all that again... and most women are not in the mental state to progress court action”

## **5. Increased Complexity for Police**

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The proposed Police Protection Directions (PPDs) introduce additional administrative and procedural complexity for frontline officers, which undermines the stated goal of reducing police workloads.

Contrary to claims of streamlining processes, the legislative framework for PPDs requires officers to navigate several conditions, exemptions, and approval processes that will likely increase paperwork and decision-making burdens. The coexistence of PPDs, PPNs, and court orders risks confusion and layering complex administrative tools onto an overstretched system will exacerbate existing inefficiencies and errors, rather than resolve them.

Roundtable participants touched upon this issue and noted that “It’s making the victim need to be even more educated...” and “It [the PPD] will be competing against other call outs for their time and other matters which will cause them to rush or make mistakes”.

## **6. Opportunities for Systems Abuse and Litigation Harassment**

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Roundtable participants raised serious concerns that the introduction of PPDs will create new avenues for perpetrators to manipulate the legal system and further harass victim-survivors.

The ability for respondents to initiate both internal police reviews and court reviews of PPDs provides multiple opportunities for systems and litigation abuse, enabling abusers to maintain contact, exert control, and exhaust victims emotionally and financially. As one participant observed, “Of course they’re going to appeal, why wouldn’t they?”—underscoring the likelihood that perpetrators will exploit every available process to prolong their involvement in victims’ lives.

Systems abuse - where perpetrators misuse legal and administrative processes to harass, intimidate, or control victim-survivors - is widely recognised in Australian family law and domestic violence literature<sup>16</sup>. Such abuse can include repeated or strategic appeals, cross-applications, and the deliberate prolonging of legal proceedings, all of which can drain victims’ resources and undermine their safety.

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<sup>16</sup> <https://dfvbenchbook.aija.org.au/article/1080119>

In May 2024, at the Tasmanian House of Assembly during the Second Reading Speech for the Family Violence Amendment Bill 2024, the Tasmanian Attorney-General noted that “organisations who work with victim survivors have told me that the difficulties of being granted an extension puts women in grave danger,” and that “about 2/3 [of women] don’t pursue extensions to an FVO (unless brought on by police, where the party doesn’t bear costs)<sup>17</sup>”. This statement highlights ongoing concerns about the accessibility and frequency of court challenges and variations to family violence orders, including PFVOs, in Tasmania, as well as the increase in risk for victim-survivors seeking extensions.

## **7. Reduced Protection for Victims-Survivors**

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The introduction of Police Protection Directions (PPDs) risks undermining Queensland’s hard-won standard of five-year protection orders by potentially reducing the duration of protection for victim-survivors to just 12 months. This change would shift the burden onto victim-survivors to seek extensions in court, often without guaranteed police support or access to legal assistance. The PPD model also restricts a victim-survivor’s ability to add extra or more stringent conditions—such as a no-contact or ouster provision—after a PPD is issued. If additional protections are needed, the onus falls squarely on the victim-survivor to initiate court proceedings, a process that can be daunting and retraumatising, especially when already managing ongoing risk from the perpetrator.

Participants in the Red Rose Foundation roundtable highlighted that these changes could create significant risks for victim-survivors and their children, as they may be forced to navigate complex legal processes alone to secure the safety measures they need. One participant emphasised the critical role that court-issued protection orders and judicial oversight have played in their safety: “I’ve been through years of domestic violence and if it wasn’t for protection orders and the support of the courts, my kids and I probably wouldn’t be here.”.

Further, the PPD model risks reducing opportunities for referrals to support services and behaviour change programs, which are often facilitated through court processes and can be ordered by magistrates as part of a holistic response to domestic and family violence.

Participants also noted that perpetrators are often adept at exploiting gaps in the system, continuing to harass and breach conditions without leaving enough evidence for victims to secure an extension of protection. This places victims in the precarious position of having to wait for another act of violence before they can seek further protection, leaving them exposed and vulnerable.

By reducing the duration and flexibility of protection and shifting the burden of seeking further safeguards onto those already at risk, the PPD model risks leaving victim-survivors and their children more vulnerable to ongoing abuse.

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<sup>17</sup> [https://www.parliament.tas.gov.au/\\_\\_data/assets/pdf\\_file/0023/87323/Family-Violence-Amendment-Bill-2024-2RS.pdf](https://www.parliament.tas.gov.au/__data/assets/pdf_file/0023/87323/Family-Violence-Amendment-Bill-2024-2RS.pdf)

## **8. Risk of Weakening DFV Protections and Shifting Burden to Victims**

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Currently, police typically issue Police Protection Notices (PPNs) with only standard conditions, and any additional or more protective conditions - such as no-contact or ouster provisions - are generally determined through a court process<sup>18</sup>. The proposed PPDs are likely to follow this pattern, with police defaulting to standard conditions to minimize administrative burden and avoid the additional steps required for more stringent protections. As a result, if a victim-survivor needs extra conditions for their safety, they will need to initiate court proceedings themselves, often without police support.

This shift places a significant onus on victim-survivors, many of whom are already managing trauma, ongoing risk and the demands of daily life such as employment and caring for children. The requirement to self-advocate in court, often without legal assistance, creates a substantial barrier to securing the necessary protection and increases the risk that vital safety measures will not be put in place. As a result, it not only increases the risk of harm but also undermines the intent of Queensland's domestic and family violence reforms to deliver robust, victim-centred responses.

## **9. Misidentification of Perpetrator**

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Sector experts and lived-experience advocates have consistently warned that this shift will increase the risk of misidentification—where victim-survivors are wrongly labelled as perpetrators—particularly for those who do not fit the “ideal victim” profile or who are experiencing heightened distress at the time of police intervention.

Participants in our recent roundtable expressed deep concern about police decision-making and the persistent risk of misidentification, citing personal experiences where errors by police left them less safe and without protection.

As one roundtable participant recounted, “The biggest danger is the police making a mistake... We’ve all experienced the police making a mistake.” Another shared, “When I was misidentified as the perpetrator, the interaction with the police was even worse than the violence itself... they would tell me that they believed me but that there was nothing that they could do... eventually they withdrew the temporary order. It sounds like the process would be much more difficult with a PPD. They made the mistake and it made me less safe. It was their mistake and I had to pay”.

The risk of misidentification is not theoretical. Research and sector submissions confirm that victim-survivors, particularly Aboriginal and Torres Strait Islander women, women from culturally and linguistically diverse backgrounds, and those with disabilities are disproportionately vulnerable to being wrongly identified as perpetrators. The Queensland Domestic and Family Violence

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<sup>18</sup> <https://queenslandlawhandbook.org.au/the-queensland-law-handbook/family-law/domestic-violence/types-of-protection-orders/>

Death Review and Advisory Board found that in nearly half of all female deaths reviewed, the woman had previously been identified as a respondent to a domestic violence protection order. This pattern of misidentification not only denies victim-survivors the protection they urgently need and leaves them exposed to further harm from the perpetrator, but can also result in criminalisation, loss of child custody, and further trauma<sup>19 20 21</sup>.

Despite recent efforts to improve police training and risk assessment tools, roundtable participants reported a lack of confidence in police capacity to consistently identify the person most in need of protection. The Queensland Police Union itself acknowledges that while misidentification rates have decreased, they remain above acceptable levels and that the consequences of misidentification under the PPD regime could be even more severe<sup>22</sup>.

Continued misidentification means that those most in need of protection may be left at risk, while perpetrators may exploit these errors to further manipulate and harm their victims. As one participant stated, “They made the mistake and it made me less safe. It was their mistake and I had to pay”.

## **10. Increased risk to Children**

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The move to PPDs raises significant concerns about the safety of children in families affected by DFV. Evidence shows that children exposed to DFV are at heightened risk of serious harm, including non-fatal strangulation and homicide - especially in situations where protective measures are weakened or shortened<sup>23</sup>.

The reduction in the standard duration of protection orders from five years to just 12 months under the PPD model means that children may be left unprotected sooner, increasing their exposure to risk, ongoing violence and instability. This is particularly troubling given that certain forms of abuse, such as strangulation, are strong warning signs for future lethal violence. When legal protections lapse or are not robustly enforced, the likelihood of harm to children rises.

Additionally, the administrative complexity and likely default to standard conditions in PPDs may mean that police are less likely to impose no-contact or ouster provisions that can shield children from direct or indirect contact with perpetrators. In practice, this could allow abusive individuals to maintain access or proximity to children, even in high-risk situations, unless the victim-survivor is able to successfully navigate the court system to seek stronger conditions, which is often out of reach for many families.

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<sup>19</sup> <https://intouch.org.au/wp-content/uploads/2023/10/inTouch-Position-Paper-Misidentification-February-2022.pdf>

<sup>20</sup> <https://ntv.org.au/wp-content/uploads/2024/03/Submission-to-the-Queensland-Governmen-Independent-Commission-of-Inquiry-into-Queensland-Police-Service-responses-to-domestic-and-family-violence.pdf>

<sup>21</sup> [https://www.aic.gov.au/sites/default/files/2024-02/ti684\\_how\\_police\\_body-worn\\_cameras\\_can\\_facilitate\\_misidentification\\_in\\_DFV\\_responses.pdf](https://www.aic.gov.au/sites/default/files/2024-02/ti684_how_police_body-worn_cameras_can_facilitate_misidentification_in_DFV_responses.pdf)

<sup>22</sup> <https://www.qpu.asn.au/uploads/QPU%20BlueprintForActionDFVFinal.pdf>

<sup>23</sup> <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/domestic-homicide>

Children's safety is at greater risk when legal protections are weakened or shortened, as is likely under the proposed PPD model. By making it harder to secure robust, long-term protective conditions, the system may leave children exposed to ongoing harm and instability, while placing even greater pressure on victim-survivors to navigate complex processes to keep their families safe.

## **11. No Formal Evidence of Efficacy**

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While we acknowledge the intention to innovate in Queensland's response to domestic and family violence, there is currently no formal evidence demonstrating that the proposed PPDs model is effective in improving safety for victim-survivors or in preventing domestic abuse-related deaths.

There is currently no robust data indicating that police-issued protection order models in other jurisdictions, such as Tasmania, have led to a reduction in domestic violence deaths or improved outcomes for victim-survivors. During the Public Briefing for the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025 (Education, Arts and Communities Committee, Queensland Parliament, 21 May 2025), Assistant Commissioner Katherine Innes of the Queensland Police Service referenced anecdotal reports from a recent visit to Tasmania, suggesting a "reducing fatality rate in relation to aggrieves,"<sup>24</sup>. We have requested further details in relation to this observation as members of the Queensland Death Review Board and as part of our charitable aim to uncover and share learning to prevent domestic abuse related deaths. However, to date, we have found no independent evaluation demonstrating that police-issued orders in Tasmania prevent serious harm or homicide.

However, there are independently evaluated models that involve specialist DFV service professionals working alongside police in frontline responses. These collaborative approaches have shown greater potential to improve outcomes for victim-survivors, as well as to support police in managing the complexity of DFV cases<sup>25</sup>. In addition to these, the Deputy State Coroner's report into the deaths of Hannah Clarke and her children, recommended the trial of specialist domestic violence police stations staffed with trained officers and supported by comprehensive training programs<sup>26</sup>. These models all focus on building police capability and ensuring that victim-survivor safety remains at the centre of DFV responses.

## **12. Undermining Progress on Coercive Control Reform**

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<sup>24</sup> <https://documents.parliament.qld.gov.au/com/EDUCATIONA-7015/DFVPOLAB20-3862/Public%20briefing%20held%20in%20Brisbane%20on%2021%20May%202025.pdf>

<sup>25</sup> [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4369672](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4369672)

<sup>26</sup> [https://www.courts.qld.gov.au/\\_\\_data/assets/pdf\\_file/0010/723664/cif-hannah-clarke-aaliyah-baxter-laianah-baxter-trey-baxter-and-rowan-baxter.pdf](https://www.courts.qld.gov.au/__data/assets/pdf_file/0010/723664/cif-hannah-clarke-aaliyah-baxter-laianah-baxter-trey-baxter-and-rowan-baxter.pdf)

The introduction of PPDs threatens to reverse the significant progress Queensland has made in recognising and responding to coercive control as a core element of domestic and family violence.

Recent reforms, including the criminalisation of coercive control and recommendations from the Women's Safety and Justice Taskforce, were designed to move away from a narrow, incident-based approach and instead focus on identifying patterns of abusive behaviour, context, and the dynamics of power and control within relationships.

PPDs, by contrast, risk entrenching a bureaucratic, incident-focused response. Rather than requiring police to consider the broader history and context of abuse, the PPD model is likely to prioritise immediate, observable incidents, often physical in nature, while overlooking the more subtle and insidious forms of coercive control that can be just as harmful.

The Bill does not direct police to assess patterns of behaviour over time or the relationship as a whole, which is fundamentally at odds with the intent of Queensland's new coercive control laws and the Domestic and Family Violence Act's requirement to consider cumulative and contextual factors.

By sidelining the context and cumulative impact of abuse, the proposed changes could undermine the effectiveness of Queensland's coercive control laws and leave victim-survivors less protected, less believed, and less able to access justice

### **Alternatives to Police Protection Directions**

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As an alternative to PPDs, to address domestic and family violence the Red Rose Foundation recommends that the Queensland Government undertakes to:

1. Continue to implement the **recommendations from the Women's Safety and Justice Taskforce** and measure and evaluate their efficacy to date.
2. Create the role of a **DFSV Commissioner** to provide a single focus point and high-level support in the Statewide effort to eliminate all forms of domestic and family violence and abuse.
3. **Invest comprehensively in DFSV services** including early intervention and prevention, crisis services, shelters, healing and recovery, women's health services and behaviour change programs.
4. Support the **continued improvement of policing of DFV** including through the implementation of recommendations included in the Commission of Inquiry into Queensland Police Service responses to domestic and family violence and the measurement and evaluation of their efficacy and areas for further improvement.
5. **Scale up support** for the continued improvement of policing of domestic and family violence including through an increased implementation of the co-responder model across the state.



6. The pilot of a **dedicated DFV Police Unit** per recommendation 3. In the Coroner's report into the death of Hannah Ashlie Clarke and her children, Aaliyah Anne Baxter, Laianah Grace Baxter, Trey Rowan Charles Baxter, and Rowan Charles Baxter<sup>27</sup>.
7. Provide the **opportunity to collaboratively explore alternative options** that are driven by the motive of improving responses to survivors of DFV and have the additional benefit of supporting the police with responses to the complexity of DFV.

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## Response to the proposed introduction of Video Recorded Evidence-in-Chief (VREC) Framework.

The following outlines the Red Rose Foundation's overall position supporting the proposed introduction of the VREC framework.

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### 1. Video Recorded Evidence-in-Chief (VREC) framework

We support expanding VREC in Magistrates Courts statewide, alongside victim-focused police training, to prevent victim-survivors from being re-traumatised by repeatedly retelling their evidence.

However, we do not support removing the requirement for police to be trained in taking VREC due to the following considerations:

Quality and Sensitivity of Evidence Collection: Specialist and dedicated training equips officers with the skills to handle DFV disclosures with sensitivity and trauma-informed approaches, which is crucial for minimising additional harm to victim-survivors and ensuring high-quality, admissible evidence.

Consistency and Best Practice: Without mandated training, there is a risk of inconsistency in VREC statement recording processes, potentially undermining the reliability and effectiveness of evidence presented in court.

Victim-Survivor Centred Approach: Training helps officers understand the complexities of DFV, including the dynamics of abuse and barriers to disclosure, supporting a victim-centred process that may encourage, cooperation and trust within the justice system.

Increasing Community Confidence: Requiring specific training signals a commitment to best practice and can help build community trust in police responses to DFV.

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<sup>27</sup> [https://www.courts.qld.gov.au/\\_\\_data/assets/pdf\\_file/0010/723664/cif-hannah-clarke-aaliyah-baxter-laianah-baxter-trey-baxter-and-rowan-baxter.pdf](https://www.courts.qld.gov.au/__data/assets/pdf_file/0010/723664/cif-hannah-clarke-aaliyah-baxter-laianah-baxter-trey-baxter-and-rowan-baxter.pdf)

While the proposed legislative changes suggest that internal police policies could address training needs, the absence of formal, mandated requirements risks leaving critical areas - such as trauma-informed interviewing and victim engagement - deprioritised or inconsistently delivered. This lack of consistency could undermine both the experience of victim-survivors and the effectiveness of the justice response.

Comprehensive, mandatory training is essential not only to ensure police are equipped to respond appropriately to domestic and family violence, but also to provide an opportunity to strengthen DFV responses across the entire police force

## **Conclusion**

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Thank you again for the opportunity to provide a submission to the Inquiry and please advise if we can assist further.

Kind Regards,



Lucy Lord  
CEO Red Rose Foundation