

Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025

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30 May 2025

Committee Secretary

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

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

Dear Committee Secretary,

We welcome the opportunity to provide a submission to the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025 Inquiry ('the Inquiry').

Much more must urgently be done to address domestic and family violence (DFV) in our communities, and we welcome the Queensland Government's continued commitment to reform. Reforms must be guided by evidence, lived experience, and the practical insights of frontline service providers.

As the Chief Executive Officer of the Centre for Women & Co. (CFW), I represent a not-for-profit organisation that provides free specialist DFSV services, women's wellbeing programs, and behaviour change programs for men across the Logan and Redlands regions. We receive on average 485 referrals per month, with nearly half of these referred by the Queensland Police Service (QPS), providing our organisation deep insight into the systemic challenges in police identification practices and their impacts on the safety and wellbeing of women and children.

Misidentification and Police Protection Directions (PPDs)

We strongly oppose the introduction of Police Protection Directions (PPDs). These proposed measures place significant discretionary power in the hands of frontline police and risk compounding an already critical issue, misidentification of the person most in need of protection.

The current reactive nature of police responses, which rely on incident-based assessment, often fails to capture the broader context and patterns of coercive control and systems abuse. Our service has supported numerous victim-survivors who were incorrectly identified as respondents following single incidents, while the person using violence manipulated the system to avoid accountability.

This issue is particularly prevalent for women experiencing compounding forms of disadvantage, including First Nations women and women from migrant or refugee backgrounds, who may not be believed, are misjudged due to trauma responses, or cannot communicate effectively due to lack of interpreter access.



Our concerns are reinforced by national and state-level data. A 2017 analysis by ANROWS of 27 domestic homicides in Queensland found that nearly half of the women killed had previously been listed as respondents on protection orders. Alarming, almost all Aboriginal women who were killed had been recorded as both respondents and victims on protection orders (ANROWS, 2019). These findings underscore the life-threatening implications of misidentification and the critical need for improved identification practices before further police powers are introduced.

Systemic Gaps in Identification and Risk Assessment

Victim-survivors supported by our service frequently report that protection orders are issued or served without a clear explanation of the conditions or the legal implications. Many report being unaware of their rights or what constitutes a breach, which creates confusion, distrust in the system, and unintended legal consequences.

There is a distinct lack of consistent, validated assessment tools to support police in identifying patterns of DFV and the predominant aggressor. Misidentification often results from:

- Overreliance on first reports or visible injuries
- Failure to assess fear, history, and context
- Inadequate trauma-informed and culturally safe practices
- Absence of judicial oversight when police actions replace court proceedings

These issues are compounded when the appeals process is inaccessible. Legal advice is often available only via brief community legal service appointments, with limited or no representation. This forces many women to self-represent or rely on duty lawyers, whose capacity varies greatly across the state.

Removing court processes through the introduction of PPDs would strip vital safeguards, including judicial review and the opportunity for support service referrals and mandated perpetrator interventions that often occur through court proceedings.

Recommendations

1. Do not proceed with full implementation of Police Protection Directions (PPDs) without first undertaking a limited, monitored trial in partnership with DFV specialist services.

If PPDs are to be considered, they should only be trialled in carefully selected locations under clear and accountable conditions. A trial should:

- Be co-designed and co-delivered with DFV specialist services through existing co-responder and High Risk Team (HRT) models.
- Include mandatory consultation between police and DFV specialist practitioners before a PPD is issued.



- Require use of consistent, trauma-informed risk assessment tools to identify the person most in need of protection and to guard against misidentification.
- Be overseen by an independent evaluation process measuring impacts on safety, system trust, referral pathways, and accuracy of identification.
- Ensure judicial oversight remains accessible to review any decisions made under the PPD framework.

This staged and accountable approach would allow any risks to be identified and addressed early, before broadening the use of PPDs across the state.

2. Mandate the development and use of a standardised, trauma-informed assessment framework for identifying the predominant aggressor across all agencies. This must include consideration of context, pattern of harm, and fear, rather than isolated incidents.

3. Strengthen police training and supervision on coercive control, trauma presentations, cultural safety, and systems abuse. Expand the co-responder model across the state to ensure that DFV practitioners are directly involved in real-time assessments.

4. Protect victim-survivors' rights through strong appeal and review mechanisms. Individuals misidentified in protection order applications must have accessible avenues to request review, correction, or withdrawal based on new or clarified information.

5. Preserve the role of the judiciary in DFV matters. Courts provide critical oversight, the opportunity for legal representation, and access to support services such as behaviour change programs. Bypassing these processes risks further marginalising victim-survivors and weakening accountability for perpetrators.

Video Recorded Evidence-in-Chief (VREC)

We support the expansion of VREC in Magistrates Courts across Queensland. This approach protects victim-survivors from being retraumatised by retelling their experiences multiple times. Many women accessing our service describe having to repeat their story to multiple people as one of the most traumatising aspects of seeking justice.

However, we do not support removing the requirement for police to be trained in the use of VREC. Proper, trauma-informed training is essential to ensure the VREC process is both safe and effective for the person providing evidence.

Conclusion

We are at a critical juncture. The decisions made through this Bill will echo through the lives of thousands of victim-survivors across Queensland. We urge the Committee to be bold, to reject



reforms that risk deepening harm, and instead embed systems that are evidence-based, trauma-informed, and guided by the real-world experience of those working at the frontline.

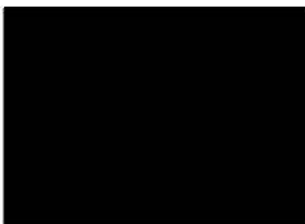
As a specialist DFSV service provider, we see the consequences of system failures every day. We witness the pain, the retraumatisation, and the erosion of trust that occurs when women are misidentified, silenced, or unsupported. But we also witness the power of systems that listen, that respond appropriately, and that act with care and accountability. We know what works. We know what doesn't.

There is a real opportunity here to stop replicating harm. To stop embedding short-term 'efficiencies' that come at the cost of safety. And to start building something that will genuinely protect and empower victim-survivors. We can make decisions now that reflect the bravery of those who seek help, and the wisdom of those who walk alongside them.

We urge you to lead with care, courage, and collaboration. Let this be the moment we changed the story, for the **better**.

Thank you for the opportunity to contribute to this vital Inquiry.

Sincerely,



Stacey Ross
Chief Executive Officer
The Centre for Women & Co.



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