Domestic and Family Violence Protection and Other Legislation Amendment Bill 2026

Submission No:	005
Submission By:	The Salvation Army
Submission Publication:	Making the submission and your name public.



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October 2026

About The Salvation Army

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 violence and modern slavery 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

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**>

Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the Education, Arts and Communities Committee in relation to the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2026 (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 – including the objectives to increase protection for victim-survivors, strengthen justice responses, and improve efficiency for police when responding to family and domestic violence.

We caution however, that legislative reforms alone will not achieve sustainable outcomes for victim-survivors, persons using violence, or police. Whilst not directly discussed in the Bill, to achieve its objectives, we highlight that victim-survivors best engage with supports when their basic needs are met – including their safety and access to stable income and housing. Victim-survivors continue to report remaining in, or returning to, unsafe situations due to housing shortages, affordability pressures, and the lack of available crisis accommodation.

We press that this Bill must be accompanied by significant systemic investment and reform to achieve its desired goals.

We also note that any legislation and policy reform must also consider the needs of children as victim-survivors in their own right, and the need for child-centred risk assessment and information sharing.

This submission covers:

- Preventing the misidentification of victim-survivors as persons using violence, and the need to invest in regular, mandated training for police.
- Investing in co-responder and embedded practitioner models to strengthen justice responses and improve efficiency for police officers.
- Ensuring that both victim-survivors and the specialist family and domestic violence sector have a thorough understanding of the electronic monitoring pilot and where to access support.

The Salvation Army has made 3 recommendations for the Education, Arts and Communities Committee to consider. A summary of these recommendations follows on the next page.

Summary of recommendations

Recommendation 1

1.13 The Salvation Army recommends that the Queensland Government increase investment aimed at reducing misidentification in family and domestic violence matters. This must include regular, targeted and mandated specialist training for police on the nature of family and domestic violence as a pattern of behaviours.

Recommendation 2

1.20 The Salvation Army recommends that the Queensland Government invest in co-responder and embedded practitioner models to support strengthened justice responses to family and domestic violence.

Recommendation 3

2.4 The Salvation Army recommends that the Queensland Government ensure the specialist family and domestic violence sector, and victim-survivors, are well informed of changes to the EM Pilot by:

- *Providing training and resources to specialist family and domestic violence services; and*
- *Ensuring victim-survivors have access to information on the EM Pilot, legislative changes, and where to seek support.*

1 Strengthening justice responses to family and domestic violence

1.1 The Salvation Army supports the intention of the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2026 (the Bill) to strengthen justice responses to family and domestic violence.

1.2 We believe that the following reforms are critical both to the development and success of the Bill in supporting best outcomes for victim-survivors of family and domestic violence.

Preventing misidentification of victim-survivors as persons using violence

1.3 Police play a crucial role in supporting the safety of victim-survivors and holding persons using violence accountable. We acknowledge the intention of the Bill to improve efficiency of police responses to family and domestic violence. Yet our Queensland services continue to report high numbers of victim-survivors being misidentified as the person using violence.

1.4 Treating victim-survivors of violence as persons using violence not only undermines confidence in the legal system and justice responses, but it also denies victim-survivors appropriate support.[1]

1.5 We acknowledge that, as outlined in the Bill's explanatory notes, safeguards against misidentification have been provided – including exceptions to the requirement to issue a Police Protection Direction (PPD) if the police officer identifies the person in custody as the person most in need of protection. We do not believe that these safeguards alone will be sufficient to prevent misidentification.

1.6 These safeguards rely heavily on responding police officers having 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. Our experience is that police responses to instances of family and domestic violence are inconsistent.

1.7 For these safeguards to be effective, we highlight the need for specialist training for all police.

1.8 Training must cover family and domestic violence as a pattern of behaviours as opposed to a one-off instance of violence. It must also reflect to the needs of diverse cohorts – including victim-survivors living with disability, and those from culturally and linguistically diverse backgrounds.

[1] 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://20ian81kynqg38bl3l3eh8bfwpengine.netdna-ssl.com/wp-content/uploads/2019/10/Nancarrow-PMINOP-RR.3.pdf.

1.9 Any training that aims to reduce misidentification must also include ensuring there is an understanding of the neo-colonial context of violence. This is particularly important in relation to Aboriginal and Torres Strait Islander victim-survivors, who, due to systemic discrimination and intergenerational trauma, may resist and be reluctant to cooperate with police during investigations. Training must also consider the need to ensure culturally safe responses for migrants, refugees and people seeking asylum.

1.10 We stress that this training must be mandated and repeated regularly for all police.

1.11 The Salvation Army believes that modern slavery is a manifestation of family and domestic violence in some instances. As such, we continue to advocate for specialist training of police and justice agencies on forced marriage, domestic servitude and migration related coercion. This must include the embedding of modern slavery indicators within police family and domestic violence risk assessment frameworks, and strengthening referral pathways to support services for survivors.

1.12 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. This is discussed further below.

Recommendation 1

1.13 The Salvation Army recommends that the Queensland Government increase investment aimed at reducing misidentification in family and domestic violence matters. This must include regular, targeted and mandated specialist training for police on the nature of family and domestic violence as a pattern of behaviours.

Investing in co-responder and embedded practitioner models

1.14 We welcome the intention of the Bill to strengthen justice responses and improve efficiency for police officers. We point to the benefit of investing in co-responder and embedded practitioner models in achieving this goal.

1.15 Embedding family and domestic violence specialists within police units assists with recognition and identification of people in most need of protection from family and domestic violence, whilst also benefiting police. These family and domestic violence specialists can empower, advocate for, and refer victim-survivors to services. We have also seen the benefits from, and support the use of, embedded family and domestic violence specialist models as a mechanism to hold persons using violence accountable and change their trajectory.

1.16 The Salvation Army family and domestic violence services provide two Embedded Practitioners co-located within the Mackay and Northern Beaches Police Stations. This collaborative response has provided more opportunities for mutual learning and capacity building, and has enhanced measures to keep people using violence in view and accountable.

1.17 We have seen an anecdotal increase in the number of police recognising family and domestic violence, and an increase in the number of victim-survivors accessing support at these police stations.

1.18 Victim-survivors in these locations have experienced great outcomes. For example:

- Our embedded practitioner supported a victim-survivor living with a disability who was experiencing family and domestic violence perpetrated by her adult daughter. The embedded practitioner supported the victim-survivor to engage with police, pursue a private application for a Domestic Violence Order and make an informed decision around her rights and the legal options available to her.
- On referral from the Queensland Police Service, our embedded practitioner supported an adult male who identified as a member of the LGBTIQA+ community. The embedded practitioner was able to provide support including safety planning, psychoeducation around family and domestic violence, emotional support, information on family and domestic violence leave, and support in completing a Victims Assist Queensland application. The victim-survivor reported that they felt supported, was believed and had the information required to make informed decisions.
- Our embedded practitioner supported a victim-survivor with a toddler who was at imminent risk. There were concerns that the victim-survivor could be misidentified as the person using violence due to previous experiences. The victim-survivor was supported to engage with police, and subsequently a Police Protection Notice (PPN) was issued. The victim-survivor re-engaged a year later regarding breaches of the Temporary Protection Order, and was supported with reporting these to police. The victim-survivor noted that her initial engagement with the embedded practitioner meant she was confident to re-engage and felt supported to report the breaches.

1.19 We also draw attention to our Alexis Program in Victoria, outlined below, which takes a holistic approach with families and provides support to victim-survivors, adults and children, as well as the person using violence. We recommend that the Queensland Government consider making resources available to roll out similar programs.

Alexis Family Violence Response Model (Alexis)

Established in 2014, the Alexis is a partnership between The Salvation Army and Victoria Police, targeting high-risk and repeat family and domestic violence cases.

The model embeds specialist family and domestic violence practitioners within police stations' Family Violence Investigation Units, enabling a coordinated response for victim-survivors, children and people using violence.

A key feature of the model is its ability to provide immediate, flexible and assertive outreach alongside real-time information sharing between police and specialist practitioners. Through daily joint triage, collaborative risk assessment and shared intervention planning, Alexis can respond at critical points of risk and engage people who may not otherwise access support. Specialist practitioners engage both victim-survivors and persons using violence simultaneously. The model works with victim-survivors regardless of whether they remain in, leave or return to a relationship, while also creating opportunities to engage people using violence earlier in their intervention journey. This whole-of-family approach strengthens safety, accountability and long-term engagement with support services.

Independent evaluations undertaken by RMIT University[2] have demonstrated strong outcomes, including:

- Significant reductions in family violence recidivism;
- Lower risk levels for both victim-survivors and people using violence; and
- Exceptionally high engagement rates with priority cohorts.

Evaluations have also highlighted benefits for policing responses including:

- Enhanced risk management; and
- Stronger information sharing and improved collaboration across the service system.

By combining specialist family and domestic violence expertise with the responsiveness of policing, Alexis provides an innovative and evidence-informed model that improves safety outcomes for families who are often beyond the reach of conventional service responses.

Recommendation 2

1.20 The Salvation Army recommends that the Queensland Government invest in co-responder and embedded practitioner models to support strengthened justice responses to family and domestic violence.

[2] Harris, L., Powell, A., & Hamilton, G. (2017, August). *Alexis – Family Violence Response Model.* School of Global, Urban and Social Studies RMIT University. https://www.salvationarmy.org.au/scribe/sites/auesalvos/files/documents/fdv/CSN_CLT_REP_Alexis_Report_20171127.pdf; Hamilton, G. et al. (2024). *Updated Evaluation of the Alexis Family Violence Response Model.* RMIT University, Melbourne. https://research-repository.rmit.edu.au/articles/report/Updated_Evaluation_of_the_Alexis_Family_Violence_Response_Model/28426769?file=53341361 .

2 Improving understanding of the Electronic Monitoring Pilot

2.1 The Salvation Army acknowledges the Bill's aims to expand the Electronic Monitoring Pilot (the EM Pilot).

2.2 Our services report ongoing ambiguity amongst both victim-survivors and specialist family and domestic violence staff as to how the EM Pilot works.

2.3 We suggest that to promote best outcomes for victim-survivors, it would be beneficial for specialist services to have access to resources and training regarding the EM Pilot – including how it differs and overlaps with other electronic monitoring programs, what will occur in the event of breaches, and how to support requested variations and reviews. We also suggest the need for educational materials and information for victim-survivors regarding the EM Pilot to ensure they are empowered to seek support and engage with services effectively.

Recommendation 3

2.4 The Salvation Army recommends that the Queensland Government ensure the specialist family and domestic violence sector, and victim-survivors, are well informed of changes to the EM Pilot by:

- **Providing training and resources to specialist family and domestic violence services; and**
- **Ensuring victim-survivors have access to information on the EM Pilot, legislative changes, and where to seek support.**

3 Conclusion

3.1 The Salvation Army thanks the Education, Arts and Communities Committee for the opportunity to provide a written submission.

3.2 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 ecqld@salvationarmy.org.au.

The Salvation Army Australia Territory

October 2026