



Family Violence Reforms Bill 2026

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 Tasmanian Department of Justice in relation to the draft Family Violence Reforms Bill 2026 (the draft Bill).

The Salvation Army operates family and domestic violence services in almost every state and territory across Australia. This support includes refuge, children's and parenting services, counselling, men's programs, accommodation, and advice and referral. We also interact with those impacted by family violence through a range of other frontline services. This submission focuses on aspects of the draft Bill that The Salvation Army is best positioned to comment on, based on the lived experiences of community members we support, and the expertise of our frontline staff.

The Salvation Army supports the intention of the draft Bill to strengthen Tasmania's legislative response to family violence and improve safety, accountability and support for victim-survivors. We stress that legislative reform and responses alone will not achieve sustainable long-term outcomes for victim-survivors of family and domestic violence. Ending violence in Tasmania requires significant strategic investment and coordinated reform across service, policy, administrative and legislative responses.

Any policy and legislative change must hold the safety and wellbeing of victim-survivors as paramount. Measures to mitigate the risk of misidentification of victim-survivors must remain critical. Legislative and service responses must also address the growing and evolving forms of technology-facilitated abuse experienced by victim-survivors.

The Salvation Army supports the following measures within the draft Bill:

- Expansion of legal protection from liability for persons reporting family violence (amendment to s39 of the *Family Violence Act 2004*).
- Expansion of the definition of family violence so that it also captures situations in which a person damages property that is rented or ordinarily occupied by their spouse or partner, or an affected child (amendment to s7 of the *Family Violence Act 2004*).
- Allowing for jury directions to include the nature and dynamics of family violence (inserting s371B to the *Criminal Code Act 1924*).

The Salvation Army recommends that the following areas receive further consideration:

- A significant investment in systems and services is required before a standalone criminal offence of coercive control could be implemented effectively in Tasmania. This includes enhancement of specialist training and resourcing for police and justice staff, and increased investment in frontline services for victim-survivors and persons using violence.
- Extending further the statutory limitation period for family violence offences including breaches of Family Violence Orders.

The Salvation Army has made **6** recommendations for the Tasmanian Department of Justice to consider. A summary of these recommendations follows on the next page.



Summary of recommendations

Recommendation 1

1.7 The Salvation Army recommends that the Tasmanian Government invest in increased resourcing and 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.

Recommendation 2

1.18 The Salvation Army recommends that the Tasmanian Government increase investment in the family and domestic violence service sector to meet current and projected demand. This must include adequate funding for:

- *Frontline responses for victim-survivors;*
- *Serious risk programs and service options for persons using violence;*
- *Crisis accommodation and housing pathways;*
- *Co-responder models; and*
- *A statewide risk assessment and information sharing framework, and a central intake service.*

Recommendation 3

1.25 The Salvation Army recommends that the Tasmanian Government increase investment in a broad range of initiatives that educate the community on coercive and controlling behaviours.

Recommendation 4

2.5 The Salvation Army recommends that the Tasmanian Government ensure any legislative reform consider, and work to mitigate, the risk of misidentification in instances of family and domestic violence.

Recommendation 5

2.9 The Salvation Army recommends that the Tasmanian Government extend the statutory limitation period for family violence offences including breaches of Family Violence Orders.

Recommendation 6

2.12 The Salvation Army recommends that the Tasmanian Government review legislative responses and expand service delivery to address family and domestic violence within a broad range of relationship types. This should include family members, people in family-like relationships and kinship relationships.



1 Uplifting systems and services

- 1.1 Significant investment is required in the design and delivery of infrastructure and service provision before a standalone criminal offence of coercive control can be implemented effectively in Tasmania.
- 1.2 We point to the following systemic reforms as critical prior to the introduction of legislation to criminalise coercive control.

Specialist training and resourcing for police and justice staff

- 1.3 Police and justice staff play a crucial role in supporting the safety of victim-survivors and holding persons using violence accountable. We advocate for the ongoing enhancement of specialised training to ensure all justice staff, including police, judicial officers and prosecutors, are able to identify and respond to coercive and controlling behaviours and have a clear understanding of the person most in need of protection in family and domestic violence matters. Training must focus on family and domestic violence as a pattern of behaviours as opposed to a one-off instance of violence. Training must also include understanding the neo-colonial context of violence, particularly 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.
- 1.4 Police and justice staff must also be trained to identify and respond to technology-facilitated abuse as a common form of family and domestic violence and as a mechanism to exercise coercive control. Training must be regularly updated to keep up to date with the evolving ways technology is being weaponised.
- 1.5 Criminal justice approaches to coercive control rely heavily on victim-survivors' willingness and ability to involve police. Many victim-survivors do not seek help from police because of distrust or an ineffective response when they initially sought help.¹ Victim-survivors may fear they will not be believed. They can also be terrified that the abuse will escalate if police intervene, or that they will be blamed for the abuse committed against them. To effectively operationalise a new offence of coercive control, the justice system must be skilled and resourced to appropriately identify, investigate, assess, prosecute, and try such complex domestic and family violence matters.

¹ Malins, P. & Caulfield, L. (2025). *Harm in the name of safety: Victorian family violence workers' experiences of family violence policing. Beyond Survival Project report.* Flat Out Inc.
https://static1.squarespace.com/static/5f3a46e3dffd8f36701099cf/t/689ac08a2085466759fc6090/1754972298352/Harm+in+the+name+of+safety_final+2.pdf; Richards, K. and Lyneham, S. (2014). Help-seeking strategies of victim/survivors of human trafficking involving partner migration. *Trends & issues in crime and criminal justice*, 468, Canberra: Australian Institute of Criminology.
<https://www.aic.gov.au/publications/tandi/tandi468>.



Recommendation 1

- 1.6 The Salvation Army recommends that the Tasmanian Government invest in increased resourcing and 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.**

Investment in the family and domestic violence service system

- 1.7 The family and domestic violence sector in Tasmania is currently overstretched, with services for victim-survivors and persons using violence often at capacity and operating long waiting lists. Sustained investment is required to increase the capacity of the workforce and to ensure the sector is well-resourced to support those impacted by violence. An immediate and significant increase in funding is required in the following areas prior to the introduction of a criminal offence of coercive control in Tasmania.

Frontline responses for victim-survivors

- 1.8 Any legislative change to criminalise coercive control will increase demand for family and domestic violence specialist services. Tasmania does not currently have the systems or funding in place to manage an increase in victim-survivors seeking assistance. Investing in support for victim-survivors must include case management and therapeutic supports, as well as specialised supports for children and young people as victim-survivors in their own right. Responses should also include integrated child safety and family and domestic violence responses.
- 1.9 Our family and domestic violence services have seen technology-facilitated abuse become a common form of family and domestic violence. Frontline services must be adequately funded for the significant time and resources required to keep up to date with evolving technology-facilitated abuse tactics.

Serious risk programs and service options for persons using violence

- 1.10 There are limited service options in place in Tasmania for persons using, or at risk of using, violence. We strongly advocate for increased investment in a broad range of serious risk programs and service options for persons using violence, to support accountability, change behaviours, and ultimately end family and domestic violence. No single program will meet the needs of all persons using violence. We need to develop the infrastructure to engage people using violence across multiple jurisdictions for as many years as required to make long-lasting change. This includes behaviour change programs, intensive case management, system navigation supports and long-term engagement for high-risk offenders.



Crisis accommodation and housing pathways

- 1.11 Safe and stable accommodation is essential to support the safety and recovery of victim-survivors. The absence of affordable housing means that many victim-survivors feel their only options are to remain living with the person using violence or face homelessness. We call for immediate action to increase the supply of, and access to, safe and affordable accommodation across the housing continuum. This must include increasing stock of crisis and transitional accommodation for victim-survivors of family and domestic violence, provided together with wraparound support from specialist family and domestic violence services.
- 1.12 Crisis accommodation responses must also be extended to persons using violence, especially when they are excluded from the family home, to support the safety of victim-survivors. Accommodation responses for persons using violence can address underlying drivers of disadvantage that may contribute to complexity of risk, and provide stability to support meaningful engagement in behaviour change programs.

Co-responder models

- 1.13 The Salvation Army advocates for co-responder models that embed family and domestic violence specialists within frontline services to appropriately identify and respond to family and domestic violence, and best support the people most in need of protection. We draw attention to the Alexis Family Violence Response Model (Alexis-FVRM), outlined below. The Salvation Army believes that the Alexis-FVRM provides an example of the type of integrated, evidence-informed response required to support the effective implementation of coercive control legislation. We recommend resources be made available to roll out a similar program in Tasmania.

A statewide risk assessment and information sharing framework, and a central intake service

- 1.14 We recommend the development of a statewide family and domestic violence risk assessment and information sharing framework, together with a statewide central intake service. This would support consistent identification, assessment and management of family and domestic violence and coercive and controlling behaviours.
- 1.15 We draw attention to the Victorian Multi-Agency Risk Assessment and Management (MARAM) framework, which has established clear responsibilities for the identification and management of risk related to family and domestic violence. The MARAM, together with the Family Violence Information Sharing Scheme (FVISS), has further increased agencies' capacity to understand risk and share information related to assessing or managing family and domestic violence risk.²

² Victorian Government. (2021). *MARAM practice responsibilities for professionals*. <https://www.vic.gov.au/maram-practice-guides-foundation-knowledge-guide/maram-practice-responsibilities-professionals>; Victorian Government. (2026). *Family Violence Information Sharing Scheme*. <https://www.vic.gov.au/family-violence-information-sharing-scheme>.



- 1.16 We also point to the Victorian Orange Door service which acts as a central triage point to provide specialist response to family and domestic violence incidents and supports effective information gathering to strengthen responses.

Alexis Family Violence Response Model

Established in 2014, the Alexis Family Violence Response Model (Alexis-FVRM) is a partnership between The Salvation Army and Victoria Police, targeting high-risk and repeat family violence cases. The model embeds specialist family violence practitioners within police stations' Family Violence Investigation Units, enabling a coordinated response for victim-survivors, children and people using violence. Alexis-FVRM was specifically designed for families who experience multiple and intersecting challenges, including mental health issues, homelessness, substance use, disability, justice system involvement and chronic disengagement from traditional services.

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-FVRM can respond at critical points of risk and engage people who may not otherwise access support. 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 University³ 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;
- Stronger information sharing and improved collaboration across the service system.

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

³ 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/subscribe/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.



Recommendation 2

1.17 The Salvation Army recommends that the Tasmanian Government increase investment in the family and domestic violence service sector to meet current and projected demand. This must include adequate funding for:

- Frontline responses for victim-survivors;
- Serious risk programs and service options for persons using violence;
- Crisis accommodation and housing pathways;
- Co-responder models; and
- A statewide risk assessment and information sharing framework, and a central intake service.

Community education

- 1.18 Increased investment in community education and awareness raising is critical not only to ending family and domestic violence in Tasmania, but to the success of any coercive control legislation.
- 1.19 Our services continue to highlight a lack of understanding of coercive and controlling behaviours throughout the community.
- 1.20 Our frontline experience is that the language of coercive control is not always accessible or universally understood, even across frontline services or amongst victim-survivors who have experienced coercive behaviour. The language of coercive control can also fail to capture the diverse experiences of victim-survivors, including but not limited to, Aboriginal and Torres Strait Islander, culturally and linguistically diverse, and LGBTIQ+ communities, and victim-survivors with a disability.
- 1.21 Education is critical to ensure that people are aware of, and understand, their roles and responsibilities in addressing the drivers of family and domestic violence. We must continue to educate the community to recognise and call out coercive and controlling behaviours as unacceptable.
- 1.22 Education efforts must be directed towards areas with high levels of engagement, such as schools and workplaces, and must be tailored to the needs of diverse cohorts and communities. Resources must be easily accessible for community members with low literacy, tailored to diverse priority communities and available in different languages. We also highlight the need to adapt educational initiatives to children and young people who, in our experience, require access to information in formats tailored to their age and development.

1.23 As most family and domestic violence is perpetrated by men, against women, education must be tailored and targeted to men and boys.⁴

Recommendation 3

1.24 **The Salvation Army recommends that the Tasmanian Government increase investment in a broad range of initiatives that educate the community on coercive and controlling behaviours.**

⁴ Safe + Equal. (n.d.). *Who Experiences family violence*. <https://safeandequal.org.au/understanding-family-violence/who-experiences-family-violence/>.

2 Legislative considerations

Preventing misidentification

- 2.1 The misidentification of victim-survivors as perpetrators of family and domestic violence can occur in a range of contexts, but it primarily occurs where victim-survivors are misidentified on a family violence order or face criminal charges. Treating victim-survivors of violence as perpetrators not only undermines their confidence in the legal system and justice responses, but it also denies victim-survivors appropriate support.⁵
- 2.2 Our services continue to report a high number of victim-survivors being misidentified as the person using violence, including times when both parties are issued a police family violence order without adequate investigation. This erodes victim-survivors' trust in the police and contributes to reluctance to report further instances of violence. As an example, our services are aware of an occasion when police were called after a victim-survivor staying in transitional accommodation was assaulted by her ex-partner. When police attended, they reported that they could either arrest both parties or neither of them.
- 2.3 Legislative responses that are not accompanied by sufficient safeguards and training may increase the risk of misidentification for victim-survivors, particularly Aboriginal and Torres Strait Islander women, women with disability, and women from culturally and linguistically diverse communities.
- 2.4 For example, we draw attention to the potential for the proposed Family Violence Compensation Levy to impact victim-survivors in cases of misidentification. The draft Bill includes a general discretion for the court to waive or reduce the family violence levy if satisfied it is in the interests of justice, such as cases where a party is not the predominant aggressor. In our experience, once a victim-survivor is misidentified within the criminal justice system it is common for other areas of the criminal justice system to accept and reinforce this belief rather than challenge or reverse it.

Recommendation 4

- 2.5 **The Salvation Army recommends that the Tasmanian Government ensure any legislative reform consider, and work to mitigate, the risk of misidentification in instances of family and domestic violence.**

⁵ 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://www.anrows.org.au/project/accurately-identifying-the-person-most-in-need-of-protection-in-domestic-and-family-violence-law/>.



Reviewing statutory limitation periods

- 2.6 We acknowledge the draft Bill's proposal to extend the statutory limitation period for coercive control offences and for breaches of Family Violence Orders. We are concerned the proposed periods of two years for coercive control offences, and twelve months for breaches of Family Violence Orders, remains too short.
- 2.7 Family and domestic violence is a pattern of abuse that can occur over time, sometimes over many years. There are a range of factors that deter or delay victim-survivors reporting abuse to police including, fear, preservation of safety, including children's safety and distrust in police.⁶
- 2.8 Often it will be unsafe for a victim-survivor to report abuse until they are no longer residing with the person using violence. Our services report instances where victim-survivors wait up to 18 months before they can access safe accommodation that enables them to leave a person using violence.

Recommendation 5

- 2.9 **The Salvation Army recommends that the Tasmanian Government extend the statutory limitation period for family violence offences including breaches of Family Violence Orders.**

Expanding relationship types

- 2.10 Legislative and service responses to family and domestic violence must also address coercive and controlling behaviour in relationships outside of intimate partner relationships. For example, our Moneycare and Doorways services frequently report that community members disclose financial abuse, such as forced debt, credit impairment and technology-facilitated financial abuse, in all types of relationships. This includes immediate family members, carers, guardians, relatives and people within family groups recognised by various cultures and communities. Children and young people can experience coercive control directly from parents, carers or family members, through the form of isolation, intimidation, surveillance, threats, manipulation and degradation.⁷

⁶ Malins, P. & Caulfield, L. (2025). *Harm in the name of safety: Victorian family violence workers' experiences of family violence policing*. Flat Out.

https://static1.squarespace.com/static/5f3a46e3dffd8f36701099cf/t/689ac08a2085466759fc6090/1754972298352/Harm+in+the+name+of+safety_final+2.pdf.

⁷ Fitz-Gibbon, K. (2025). *Silence and inaction: Children and young people's experiences of violence and systemic failure in South Australia*. Report prepared for the South Australian Royal Commission into Domestic, Family and Sexual Violence. Seque Consulting. https://royalcommissiondfsv.sa.gov.au/_data/assets/pdf_file/0005/1167458/Silence-and-Inaction-Report-2025-Final.pdf.



2.11 We point particularly to the need to consider the unique experiences of diverse cohorts – including but not limited to Aboriginal and Torres Strait Islander people, culturally and linguistically diverse people, people from the LGBTIQ+ community and victim-survivors with disability – and include their voices in the development of legislation. Consideration must be given to forms of violence that are pertinent to Aboriginal and Torres Strait Islander women, where “intra-kin” violence is often overlooked. Research on family violence against migrant and refugee women in Australia has also found that women in these communities can experience abuse and control from extended family members.

Recommendation 6

2.12 The Salvation Army recommends that the Tasmanian Government review legislative responses and expand service delivery to address family and domestic violence within a broad range of relationship types. This should include family members, people in family-like relationships and kinship relationships.



3 Conclusion

- 3.1 The Salvation Army thanks the Tasmanian Department of Justice 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 ECtas@salvationarmy.org.au.

The Salvation Army Australia Territory

October 2026