

## Statement from the Victims' Commissioner

17 February 2025

### Response to the Queensland Police Union of Employees 'Blueprint for Action'

As the Victims' Commissioner, I am committed to supporting change that is considered and courageous, promotes the rights of all individuals impacted by crime, and contributes to safer communities. I care deeply about getting this right.

#### Background

On 13 February 2025, the Queensland Police Union of Employees (QPU) initiated a parliamentary petition 'Make DFV a Crime'. The petition arises out of the QPU's Blueprint for Action (the Blueprint).

I note that the QPU has undertaken consultation in relation to these proposals, with [version 5 of the Blueprint publicly available](#).

I understand the QPU have made iterative changes to the Blueprint considering some feedback received through this consultation process. However, I am concerned that elements of the Blueprint do not transparently reflect the concerns previously raised by experts, including the Women's Safety and Justice Taskforce and others, about the proposals outlined in the QPU Blueprint. Alarming, the Blueprint does not reflect the diverse voices of victim-survivors.

I have written directly to the Honourable Laura Gerber MP, Minister for Youth Justice and Victim Support and Minister for Corrective Services and the QPU, outlining my concerns and provided feedback with the Blueprint in full.

This statement seeks to make clear my position on the stand-alone DFV offence and Police Protection Directions.

#### Language use

In this statement, I use the word 'victims' and 'victim-survivors' to refer to people who have or are continuing to experience domestic and family violence. I know that there are different words or phrases used to describe those who have experienced crime and are dealing with its impact. I understand and respect each person's preferences for how they describe themselves.

#### Facts – domestic violence is already a crime

- The *Criminal Code Act 1899* (Qld) and *Domestic and Family Violence Protection Act 2012* (Qld) already state that domestic violence is a crime in Queensland.
- The *Penalties and Sentences Act 1992* (Qld) makes a judge who is sentencing a person for domestic and family violence treat it seriously and the judge may give a higher sentence because of it.

- The *Domestic and Family Violence Protection Act 2012* provides for civil protection orders.
- If an offender breaches this order, they can be charged with a criminal offence.
- From 26 May 2025, ongoing patterns of coercive control and harm will be able to be recognised with the introduction of coercive control as a criminal offence, punishable by a maximum sentence of 14 years' imprisonment.

### QPU Blueprint

I acknowledge the serious challenges facing both victim-survivors of domestic and family violence and the Queensland Police Service (Police), including:

- the need for appropriate and accessible support services for victim-survivors
- the increasing volume of DFV reports
- the necessity of effective Police responses
- workforce attrition, and health and wellbeing of Police.

I also strongly support a commitment to strengthening responses that hold perpetrators accountable, particularly high-risk, repeat offenders. Effective prevention and early intervention remain critical pillars in protecting the Queensland community, especially women and children.

I understand that the Blueprint's objectives include:

- optimising the ability of Police to immediately protect victim-survivors
- streamlining the legal response to domestic and family violence
- reducing administrative burden on Police.

In addition to other proposals, the Blueprint and petition seek to:

- introduce a standalone general DFV offence which would make it a crime or summary offence to commit domestic violence against another person
- introduce Police Protection Directions, a 12-month protection order issued by Police.

### A step backwards

The Blueprint puts the safety of victim-survivors at risk. This is because:

- the Blueprint is not supported by an evidence base.
- a standalone DFV offence has been explicitly rejected by expert taskforces in 2015 (Not Now, Not Ever) and 2021 (Women's Safety and Justice Taskforce)
- the Blueprint fails to address key issues raised by victim-survivors, advocates and experts, including misidentification of the person most in need of protection, and victim-survivors receiving inadequate and inconsistent responses from Police.
- the Blueprint risks undermining years of tireless advocacy by DFV experts, including experts with lived-experience, to enhance understanding about the broader forms of non-physical abuse and control within DFV.

A standalone DFV offence and Police Protection Directions will:

- Reinforce an incident-based approach—risking undercharging serious DFV offences instead of recognising a victim's broader experience of violence and coercion, which can occur over years or decades.

- Increase the risk of Police misidentifying the person using violence, without public confidence that causes of misidentification have been appropriately addressed<sup>1</sup> — wrongfully criminalising victim-survivors instead of holding the person using violence accountable. This can lead to devastating consequences, including incarceration, job loss, child removal, and systems abuse.
- Reduce the court's involvement in Police responses—long-term Police Protection Directions reduce the involvement of the court, making it harder for victims to be involved in the process and for detailed consideration of the events and proposed conditions to be explored.
- Reduces a victim's choice and agency - the standalone DFV offence and Police Protection Directions do not require a complaint or consent from the victim. This is particularly dangerous for Aboriginal and Torres Strait Islander women, children, and men, who are already disproportionately impacted by the criminal justice system.

There is no evidence that the Blueprint will increase perpetrator accountability as it suggests.

### **Focussing on the tools available**

Rather than introducing new legislation, the focus must be on ensuring Police properly use the existing tools available to them, including legislation and collaborative approaches to responding to DFV.

This looks like:

- shifting away from incident-based policing—ensuring DFV responses recognise ongoing patterns of coercive control and harm, rather than treating violence as isolated one-off events
- ensuring Police have access to evaluated and effective training and supervision to prevent misidentification of the person using violence and improve first-response decision-making
- investing in evidence-based life-saving responses that Police already lead, including multi-agency high-risk teams and co-response and co-location partnerships with specialist DFV social workers
- providing a professional victim advocacy service, which the government has already committed to as a priority
- implementing technology solutions to enable real-time information and intelligence sharing between Police, other government agencies and specialist DFV services.

I fully appreciate that the capability, wellbeing and effectiveness of our Police must be a priority. However, my advice to government and the QPU is that preventing, intervening in, and responding to domestic and family violence is inherently complex and requires evidence-based, innovative solutions that prioritise the safety and needs of victims and the broader community.

Importantly, expert led blueprints to end violence against women, children and men already exist, including the [National Plan to End Violence against Women and Children 2022–2032](#) and the report published by the [Women's Safety and Justice Taskforce](#) in 2021.

---

<sup>1</sup> Commission of Inquiry into Queensland Police Responses to Domestic and Family Violence, *A Call for Change* (2022).