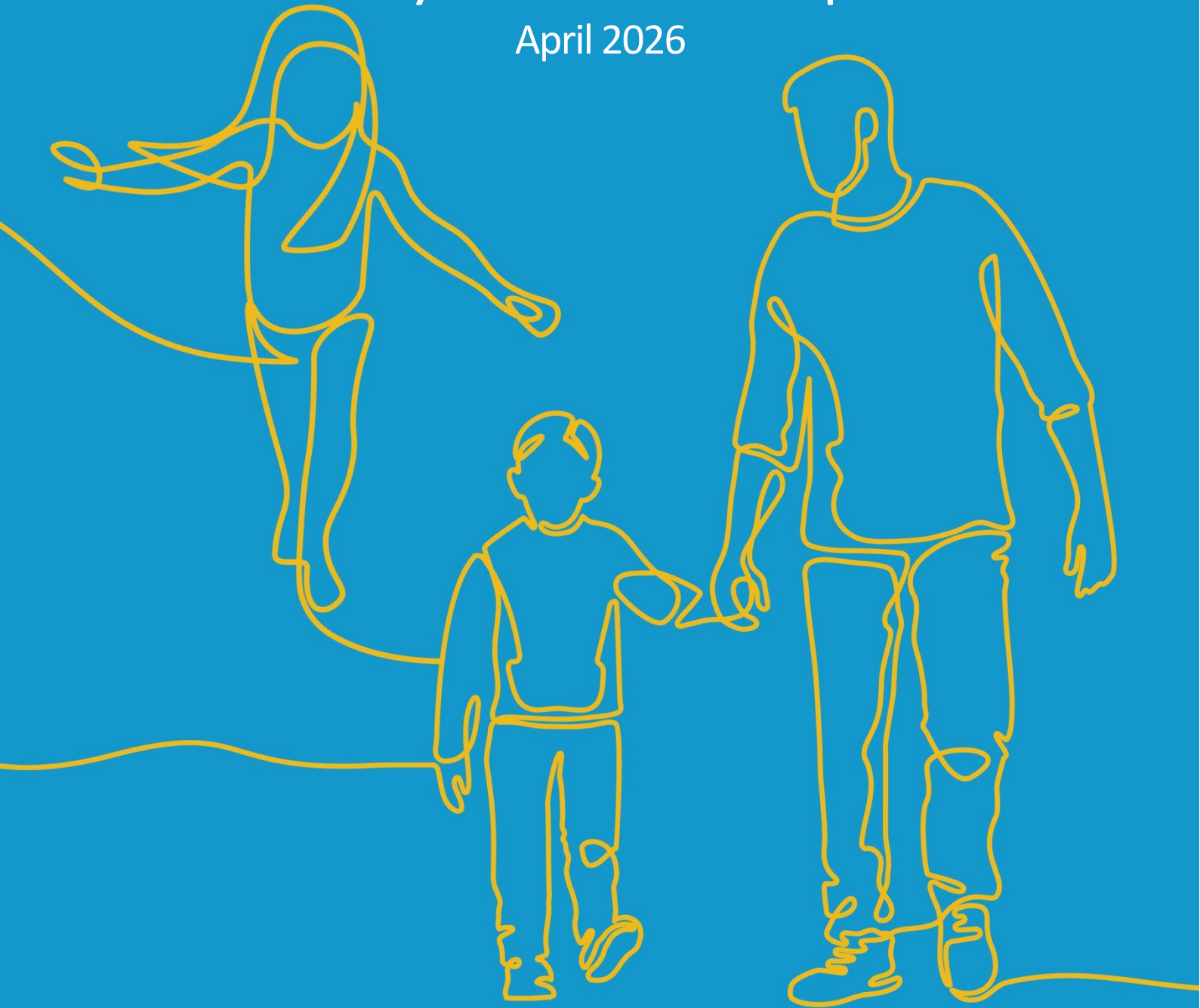


**Submission from Anglicare Tasmania in
response to
the Tasmanian Government's
Family Violence Discussion Paper
April 2026**



**WORKING FOR
A JUST TASMANIA**



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Anglicare Tasmania acknowledges the Tasmanian Aboriginal community as the traditional and original owners and continuing custodians of this land lutruwita. We pay respect to Elders past and present.

About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: Housing Connect Front Door, crisis, short-term and long-term accommodation support; mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania's mission sees us strive to achieve social justice. We report on the effects of poverty and disadvantage in our State and provide decision-makers with policy responses to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

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Executive summary

Drawing on Anglicare Tasmania's extensive frontline experience across housing, community, and family support programs, this submission identifies gaps in Tasmania's legislative, policy and practice responses that undermine the safety and wellbeing of victim-survivors of domestic and family violence, including children.

This submission argues that:

- the scope of the *Family Violence Act 2004* (the Act) should be broadened to include young people under the age of 16 in intimate partner relationships, children as victim-survivors in their own right, and a broader range of relationships
- advancing the implementation of the cross-agency risk assessment framework is critical for victim-survivor safety and must progress as a priority
- current justice responses do not always protect victim-survivors of domestic and family violence and co-responder models should be considered
- systems abuse is common, with significant impacts on victim-survivors' financial circumstances and housing stability. Anglicare Tasmania supports national recommendations for an audit of state systems to identify and address systems abuse
- housing is a critical aspect of Tasmania's family violence response, requiring a stronger focus on affordable housing for victim-survivors.

Introduction

Anglicare Tasmania welcomes the opportunity to provide feedback to the Tasmanian Department of Justice on the Family Violence Discussion Paper titled 'Strengthening our responses to family violence in Tasmania: *Family Violence Act 2004* and related legislation' (the Discussion Paper). Anglicare Tasmania has previously advocated for amendments to family violence legislation particularly in relation to risk assessment and information sharing.¹ We acknowledge the Tasmanian Government's commitment to acting on the *Rapid review of prevention approaches to end gender-based violence*.

This submission is informed by the experiences of Anglicare Tasmania's frontline staff who provide support to clients across programs in Community Services and Housing Services. Anglicare Tasmania staff work with people experiencing domestic and family violence (DFV) every day. The impacts of family violence on individuals, families and the community are significant and can be devastating. This includes victim-survivors' and children's sense of safety, connection to community, financial circumstances and housing stability. DFV is a major driver of housing instability and homelessness and is the main reason 1 in 10 clients of the Housing Connect Front Door service seek housing support.² Anglicare Tasmania will continue to advocate for increased emergency, social, and affordable housing options as critical measures to address DFV.³

The below story of Mary-Anne* was featured in Anglicare Tasmania's 2024 report [Unsafe and Unhoused](#), which detailed barriers to addressing domestic and family violence in North West Tasmania. It highlights multiple issues with the response to family violence she experienced, including

¹ Toombs G (2024) [Unsafe and Unhoused](#), Social Action and Research Centre, Anglicare Tasmania.

² Anglicare Tasmania (2025) [Housing Connect Front Door Service Quarterly Snapshot September 2025](#).

³ Toombs G (2024) [Unsafe and Unhoused](#), Social Action and Research Centre, Anglicare Tasmania; Anglicare Tasmania (2025) [Housing Connect Front Door Service Snapshot March 2025](#); Claxton S, Bennett M and Toombs G (2025) [Rental Affordability Snapshot 2025](#), Social Action and Research Centre, Anglicare Tasmania.

barriers regarding information sharing and risk assessment, misidentification of the person most in need of protection, and systems abuse, which will be discussed in further detail under relevant topic headings below. The issue in relation to the risk of costs has since been resolved with recent legislative amendments to section 34 of the *Family Violence Act 2004* ('the Act'), which were supported by Anglicare Tasmania.

Feedback is provided under topic headings raised in the Discussion Paper. This submission is not intended to be exhaustive, and future opportunities to provide feedback on draft legislative amendments will be welcomed.

Mary-Anne's story

Mary-Anne has two young children, Kyle and Erin, with her now ex-partner Michael. They held a mortgage together on the family home.

Mary-Anne left home with the children when Michael's coercive controlling behaviours and violence against both her and the children began escalating.

Police had already attended the family home because of Michael's use of weapons. There were a number of other concerning behaviours experienced by Mary-Anne, including regularly accusing her of cheating on him, threatening suicide if she left him, and filming them having sex without her consent. The risk assessment that a DFV worker completed with Mary-Anne placed her at high risk of being seriously injured or killed by Michael. Mary-Anne and her worker requested that a Police Family Violence Order (PFVO) be placed on Michael so that he would be accountable for his behaviour and Mary-Anne and her children would feel safe.

When collecting the last of her belongings from the family home, Mary-Anne found that Michael had damaged them. She attended a police station to report it and was advised he would be arrested and charged with property damage, and issued a PFVO.

Several days later, Mary-Anne was advised by police that they had decided not to issue a PFVO. Several services advocated for Mary-Anne but were not successful in changing this decision as the police response was incident-based, and there had not been a specific incident.

After Michael made his own statement to police in response to their enquiries, a PFVO was placed on Mary-Anne. She was given no explanation, and Michael's behaviour continued to escalate.

Mary-Anne was advised she could apply to revoke the PFVO, however Michael could oppose the application, and if she was unsuccessful, there was a possibility she could be ordered to pay Michael's legal costs.

Because she had a PFVO against her, Mary-Anne was not able to seek refuge in a shelter or access a Flexible Support Package of funds.

**Names and details changed to protect privacy.*

Definition of family relationship under the *Family Violence Act 2004*

The Family Violence Act should cover a greater range of relationships, and children should be protected as victim-survivors in their own right

The narrow focus of the Act on spouse/intimate partner relationships does not include young people under the age of 16 in intimate partner relationships, adequately protect children, or include other family relationships outside the spouse/intimate partner setting. Currently, where a relationship does not fall within the category of marriage or a 'significant relationship' defined in the *Relationships Act 2003*, it is not considered family violence. A person cannot apply for a family violence order (FVO) if the relationship does not fall within this narrow scope, and a restraining order is their only option for a protective order.

There are no avenues for a young person to obtain an FVO against a partner until they turn 16. Anglicare Tasmania staff provided various examples, including a young person under the age of 16 who was unable to obtain an FVO against the perpetrator of family violence and access associated support available through Safe at Home, despite having a child with the person. Anglicare Tasmania's 2022 report [Young in love and in danger](#) highlighted young people's experiences of violence in their intimate partner relationships and recommended that legislation should be reviewed and where appropriate reformed to ensure children are protected from violence and abuse in their intimate partner relationships.⁴

The rights and interests of children must be considered in family violence matters. Children are impacted by family violence in significant and unique ways. The Commonwealth Standing Committee on Social Policy and Legal Affairs Inquiry into Family Violence Orders recommended that the Attorney-General advocate for and assist all states and territories to allow children and young people to apply for FVOs and to be independently named as protected persons on FVOs.⁵ Children and young people currently have no avenue to apply for a protective order and to be independently named as protected persons. Anglicare Tasmania staff provided an example of one young person whose parent's new partner was verbally abusive towards the young person and would not allow them in the home, leaving the young person with nowhere to go. The young person did not have an avenue to apply for an FVO, due to their relationship with the perpetrator. It is insufficient to rely on the reporting of child abuse under the *Children, Young Persons and their Families Act 1997* to protect children experiencing violence, as it relies on it being witnessed and reported.

Anglicare Tasmania staff also report limited examples of affected children listed on police family violence orders (PFVOs) made in respect of their parent, indicating that they may not be listed unless physical violence has been perpetrated on them directly. Children do not have to experience physical violence to be affected. Further, if affected children are not listed, the perpetrator can contact them directly and harass and/or manipulate them.

Consideration could also be given to enshrining a requirement to consider children when making PFVOs and FVOs. For example, in Victoria the court must consider children, including:

- the court must consider any children before making a final order⁶

⁴ Hobbs C (2022) [Young, in love and in danger: Teen domestic violence and abuse in Tasmania](#), Social Action and Research Centre, Anglicare Tasmania.

⁵ Standing Committee on Social Policy and Legal Affairs, Parliament of Australia, [Inquiry into family violence orders](#) (final report, February 2025)

⁶ *Family Violence Protection Act 2008* (Vic), s731.

- the court must make an interim order for a child if it makes an interim order for an affected family member⁷
- the court can make an interim order for protection of a child on its own initiative, when an interim order is not made for the affected family member.⁸

Children’s best interests should be a primary consideration in all actions concerning them – for children and young people with experience of FV, this means that their rights, interests and needs must be considered and responded to as a priority by policy makers and service providers – not merely as secondary to the needs of their parents.⁹ Children and young people do not have to directly witness or be subjected to family violence in order to be affected. As victims in their own right, children and young people should be supported to recognise and disclose violence, seek assistance, and heal from trauma.¹⁰ – Children’s Commissioner of Tasmania

The scope of the Act also limits other relationships outside spousal relationships where abuse occurs, including between elderly parents and children and carers. An example is financial abuse of a parent by a child. Anglicare Tasmania financial counsellors report that financial abuse is common, including due to the increasing requirement for people to use online systems such as MyGov to set up income support payments. Older people, people with disability, and people with limited literacy and digital skills requiring support with these systems can be reliant on a child, friend or carer for assistance which leaves them vulnerable to exploitation. The exclusion of kinship and family relationships, non-partner elder abuse and child abuse has been considered a weakness of the Act.¹¹ In Victoria, family violence legislation applies to a broad range of family members, including domestic partners, relatives and children.¹²

Currently, there is also no protection afforded by FVOs to new partners or family members of the affected person if the perpetrator poses a risk to their safety. They are required to seek their own restraining orders where needed, and this comes with difficulties such as requiring evidence to support their application – effectively, waiting for an incident to occur – as well as the risk of costs if their application is unsuccessful, and the risk of antagonising the perpetrator by seeking an order. The justices hearing an application for a restraining order made by a person other than a police officer may, if they think fit, order either party to pay to the other such costs as the justices consider reasonable.¹³ If the scope of the Act is not expanded¹³ to include a greater range of relationships, consideration could be given to addressing the barrier of the risk of costs by amending the *Justices Act 1959* in line with the Act’s recent amendment for each party to bear its own costs, except in circumstances where the application is coercive, frivolous, vexatious or in bad faith.¹⁴ Consideration could also be given to enabling justices determining FVO applications to make own-motion restraining orders in relation to other family members as appropriate.

⁷ *Family Violence Protection Act 2008* (Vic), s53AA.

⁸ *Family Violence Protection Act 2008* (Vic), s53AB.

⁹ Commissioner for Children and Young People Tasmania (2016) [Children and young people’s unique experiences of family violence](#), accessed January 2026

¹⁰ Commissioner for Children and Young People Tasmania (2016) [Children and young people’s unique experiences of family violence](#), accessed January 2026

¹¹ Wilcox K (2007) ‘Island innovation, mainland inspiration: comments on the Tasmanian Family Violence Act’, *Alternative Law Journal*, 32(4), 213.

¹² *Family Violence Protection Act 2008* (Vic), ss8-9.

¹³ *Justices Act 1959* (Tas), s106H(1).

¹⁴ *Family Violence Act 2004* (Tas), s34.

Safety of victim-survivors of family violence: family violence orders

The Family Violence Act does not always adequately protect the rights and interests of victim-survivors

The rights and interests of victim-survivors are not always adequately protected by current legislation and justice responses to family violence. This includes the Safe at Home integrated response beginning when a police report is made, justice responses to family violence incidents, and breaches of intervention orders.

The Discussion Paper references a statistic that 3 in 4 people do not seek help from police for family violence incidents, recognising that a significant number of victim-survivors do not wish to report to police. Victim-survivors may not want police involvement for varying reasons including fear of not being believed, risk of antagonising the perpetrator, not wanting engage in a criminal justice response, and previous negative experiences with police. Without a police report, victim-survivors do not enter the Safe at Home service system. They may seek support from non-government specialist family violence organisations in the first instance without making a report to the police. In many cases making a police report or seeking an FVO would further endanger the victim-survivor's safety; however, without a recognised cross-agency risk assessment (discussed further [below](#)) this can be difficult for specialist family violence services to demonstrate.

The Rapid Review of Prevention Approaches recommended state and territory governments introduce and expand multi-agency responses, including police co-responder models.¹⁵ Co-responder models involve DFV workers or social workers alongside police, allowing for a specialist response to accompany police intervention. This can provide a more holistic response to victim-survivors, allow for referrals to services and supports for both victim-survivors and people using violence, and enable the sharing of expertise.¹⁶

In relation to breaches of PFVOs/FVOs there are examples of the rights and interests of victim-survivors not being adequately protected. This can include where the order stipulates that contact can be made with the victim-survivor if it is in relation to the children. Family violence practitioners report that perpetrators often know how to utilise this as an abuse tactic, for example, leaving numerous voicemails stating that a child is unwell. If the victim-survivor does not answer the phone, it is not possible to prove that the contact is not about the children. Where persistent breaches occur, such as hundreds of calls or messages in a short period, the perpetrator might only receive relatively few charges arising out of that. Consideration of a summary charge for persistent breaches may address the administrative burden of particularising such a high number of breaches.

In particular response to the Discussion Paper question regarding availability of perpetrator behaviour change programs, the finding of the Housing Connect Front Door Service Snapshot in March 2025 was that in the March quarter 2025, support gaps resulted in significant unmet client need in several areas, including 0% of needs met for assistance for DFV perpetrator support services.¹⁷ In other words, 100% of client need for referral to perpetrator support services was unmet, indicating a lack of available services.

¹⁵ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024), *Unlocking the prevention potential: accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

¹⁶ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the prevention potential: accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

¹⁷ Anglicare Tasmania (2025) [Housing Connect Front Door Service Snapshot March 2025](#), Social Action and Research Centre.

Information sharing between services

Work towards the cross-agency risk assessment must continue as a priority

Anglicare Tasmania has previously recommended the Tasmanian Government develop and fully implement an information sharing and risk assessment framework that results in the effective use and recognition of the Tasmanian Rural Risk Assessment (TARRA) tool across both government and non-government agencies for the benefit of victim-survivors of DFV, including amendment of the Act to recognise risk assessments completed by agencies other than police.¹⁸ Risk assessment and management mechanisms assist practitioners to identify a person's risk of experiencing domestic and family violence and the risk of violence recurring or escalating, and to initiate a response aimed at reducing the risk. Currently, the Act only recognises risk screenings and safety audits completed by police.¹⁹ Specialist family violence practitioners, including in services such as Anglicare Tasmania's Relationship Abuse of an Intimate Nature (RAIN) program, are not yet able to utilise a consistent risk assessment tool that is recognised by police and the court system. Tasmania Police use the RAST tool for risk assessment of family violence incidents, but this is not available to other agencies such as specialist family violence organisations.

The Tasmanian Government's stated commitment to a consistent risk assessment highlighted in the Discussion Paper is welcome, however work towards implementation of the Risk Assessment and Management Framework (RAMF) and TARRA across government and non-government agencies must continue as a priority. Advancing the implementation of the cross-agency risk assessment is critical for victim-survivor safety.

The idea of standardised risk assessment processes in Tasmania first introduced in the 2019 Family and Sexual Violence Action Plan.²⁰ The progress update on the Tasmanian Government's action to develop standardised risk assessment processes across government and non-government family, domestic and sexual violence services is marked as completed under Survivors at the Centre²¹ and the National Plan,²² but the RAMF and TARRA are yet to be implemented. The TARRA is adapted from Victoria's MARAM Framework, which is embedded into Victorian family violence legislation.

The Discussion Paper states: 'Further consultation and refinement are required before full implementation across the service system, including further work around how TARRA is to align with existing tools used by family and domestic violence services and with the national risk assessment project. This provides an opportunity to consolidate the local and national approaches in a way that supports consistent, trauma-informed, and culturally safe practice across the family and domestic violence service system.'

The National Risk Assessment Principles aim to guide jurisdictions in developing, revising or evaluating risk assessment frameworks, tools and resources for various cohorts (adult survivors, perpetrators, children, other family members).²³ The Discussion Paper states 'the National Risk

¹⁸ Toombs G (2024) [Unsafe and Unhoused](#), Social Action and Research Centre, Anglicare Tasmania.

¹⁹ *Family Violence Act 2004* (Tas), s4.

²⁰ Tasmanian Government (2019) *Safe Homes Families Communities: Tasmania's action plan for family and sexual violence 2019-2022*, Tasmanian Government.

²¹ Tasmanian Government (2025) *Tasmania's Third Family and Sexual Violence Action Plan 2022-2027: Progress Report 1 January - 30 June 2025*.

²² Australian Government Department of Social Services (2025) [Standardised risk assessment processes across family, domestic and sexual violence services](#), accessed January 2026

²³ Toivonen C and Backhouse C (2018) 'National Risk Assessment Principles for domestic and family violence', ANROWS, Anglicare Tasmania Submission to Family Violence Discussion Paper – 2026 | 9

Assessment Framework will not replace states and territories' existing approaches; instead, its objective is to strengthen the consistency of system responses by establishing a national understanding of best-practice approaches to family and domestic violence risk assessment and management. Once the National Risk Assessment Framework is complete, jurisdictions will develop or update their risk assessment and management frameworks to ensure alignment.' As the national framework will not replace existing state approaches, work by the Tasmanian Government to implement the RAMF and TARRA can continue and be reviewed to ensure alignment with the national framework when it becomes available. This is critical as the safety of victim-survivors cannot be put on hold. At minimum, risk assessments completed by specialist organisations must be able to be recognised by other agencies such as police and the courts, supported by sufficient information sharing mechanisms.

'Risk assessments are only effective, however, when the people conducting them are able to make safe and DSFV-informed decisions. In turn, safe decisions cannot be made without access to the right information. Information sharing regimes—where properly resourced and supported—can improve risk assessment, particularly where *information* about the person using violence would not otherwise be available. The Review recommends that governments improve operational information sharing across and within jurisdictions to support consistent approaches to risk assessment. The information sharing scheme could be modelled on the Victorian Family Violence Information Sharing Scheme, which the Review heard from frontline services is of particular value' – *Unlocking the Prevention Potential*²⁴

An information sharing scheme and risk assessment framework across government and non-government agencies is needed

The Family Violence Information Sharing Scheme (FVISS) in Victoria prescribes information sharing entities (ISEs) including police, government agencies, specialist family violence services, GPs, nurses, homelessness support services, migrant case workers, mental health services, and others. Some agencies are also prescribed risk assessment entities including police, child and family services, and specialist family violence services.²⁵ Organisations that are prescribed as information sharing entities (ISEs) are authorised to share relevant information about a person (including adults and children) who is a victim-survivor, perpetrator or third party, for the purpose of establishing, assessing and managing risk. They can share information voluntarily with other ISEs, as well as in response to a request for information from another ISE.²⁶

Similar reforms are needed in Tasmania, which would enable specialist family violence services to be information sharing and risk assessment entities. This means they could request and share with other ISEs information relevant to assessing or managing family violence risk.

The Discussion Paper states: 'Information sharing and collaboration are key to ensuring a strong response to family violence in Tasmania. Accordingly, NGOs are encouraged to contact Safe at Home

Sydney, NSW.

²⁴ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

²⁵ Victorian Government (2018) *Family violence multi-agency risk assessment and management framework*, Family Safety Victoria, Melbourne.

²⁶ Victorian Government (2018) *Family violence multi-agency risk assessment and management framework*, Family Safety Victoria, Melbourne.

partners to ensure a collaborative response to family violence. Notification to Safe at Home by NGOs should occur when they become aware that a victim-survivor has reported to Tasmania Police and have entered the Safe at Home service system. This is because information known to NGOs has the potential to support Safe at Home in its ongoing risk assessment and decision-making process, thereby ensuring a holistic, appropriate, and timely response.'

This indicates a one-way transfer of information from NGOs to Safe at Home. However, an information sharing scheme that allows information to be shared both ways across government and non-government agencies is needed. Specialist organisations build rapport with victim-survivor clients and may hold greater levels of information relating to family violence risk. Alongside implementation of the RAMF and TARRA, further work to develop an information sharing scheme must be progressed.

Information sharing to improve victim-survivors' sense of safety

The information regarding perpetrators that is provided to victim-survivors can be improved in some circumstances to increase their sense of, and actual, safety. For example:

- there can be a lack of communication from the Eligible Persons Register in relation to release dates of perpetrators, which may be because the service is not aware of release dates or is delayed in receiving that information
- no notification provided of a high risk offender leaving prison and a safety plan is needed for the victim-survivor and their support
- police may not be aware of bail conditions from the Supreme Court in a timely manner, or aware of when prisoners may be exiting.

The Department of Justice Astria program to provide integrated information sharing amongst various departments and police may rectify some of these issues.²⁷

Further issues in relation to bail include examples of judges bailing perpetrators to the family home despite advocacy from child safety services not to bail them to that address, and bail being granted by a Justice of the Peace in out-of-hours court sessions. This is despite a presumption against bail for family violence offenders. The Tasmanian Government's Handbook for JPs states that Bench Justices are JPs who the Chief Magistrate has called on to hear and deal with certain proceedings, and who have completed a special course to perform bench duties.²⁸ The Magistrates Court Annual Report 2023-24 states that Bench Justices convened 779 weekend court sessions and dealt with 504 family violence matters.²⁹

History is important in determining the level of risk posed to the safety of the affected person. JPs are not necessarily legally trained, and it is unclear whether those sitting in out-of-hours court sessions have received training on domestic and family violence. The Australian Law Reform Commission noted it is 'critical that protection order applications are, in fact, heard by judicial officers and not by justices of the peace who are not legally trained'.³⁰ To increase the safety of victim-survivors, consideration could be given to ensuring JPs sitting in out-of-hours court sessions are provided with any relevant background information and appropriate training.

²⁷ Tasmanian Government Department of Justice (2026) [Projects and initiatives](#), accessed February 2026.

²⁸ Tasmanian Government Department of Justice (2022) *Handbook for Justices of the Peace: a guide for Justices of the Peace in Tasmania*, November 2022.

²⁹ Tasmanian Government (2024) *Magistrates Court of Tasmania Annual Report 2023-24*, November 2024.

³⁰ Australian Law Reform Commission (2010) *Family violence – a national legal response: final report*, ALRC Report 114, October 2010, Volume 1, p. 254.

Reviewing the definition of harassing

Harassing should be extended in the Family Violence Act by explicitly referencing it in the context of FVOs as well as PFVOs. Currently, depending on the terms of the order, contact may be made with the victim-survivor but not considered a breach of the FVO if it is not interpreted as threatening. An example might be excessive contact stating 'I love you'. Practitioners report that breaches such as this may not be addressed, regardless of whether the victim-survivor feels intimidated or harassed.

Anglicare Tasmania family violence practitioners reflected on many examples of harassing behaviour by perpetrators towards victim-survivors, including:

- inundating the victim-survivor with hundreds of phone calls and messages
- text messages threatening suicide
- making bank transfers of tiny amounts with various text descriptions
- child support payments sent through in \$1 increments
- harassing victim-survivors by 'driving by' on numerous occasions
- a 'high risk' offender who had contacted a victim-survivor from prison, despite a full non-contact order in place. He was allowed to contact her all the time he was incarcerated.

Consideration could also be given to amending the definition of harassment to ensure it captures a wider range of behaviours. In Victoria, emotional or psychological abuse includes conduct that torments, intimidates, harasses, or is offensive to the person.³¹ This includes the specific example of threatening suicide. If the victim-survivor feels harassed in the context, there must be an avenue for them to pursue as a breach of the FVO.

Identification of the person most in need of protection and misidentification

Police responses have historically been 'incident-based' and have not always recognised patterns of behaviour. As police have generally responded to the specific incident in front of them, they may not have details of the background or a strong understanding of the patterns of family violence. This can lead to misidentification of victim-survivors as perpetrators and fail to keep victim-survivors safe, as highlighted in the story of Mary-Anne mentioned above. Misidentification can have significant impacts on victim-survivors, including on their employment, access to children, mental health, and trust in the justice system.³²

A sample of Anglicare Tasmania's clients in the Relationship Abuse of an Intimate Nature (RAIN) program was reviewed for the calendar year 2025. In this period 25 new clients to the service had PFVOs, and 2 of those were misidentified on the PFVO, demonstrating a misidentification rate of 8%. Due to the small sample size, the finding only provides an indication of frequency of misidentification and is not conclusive.

Tasmania Police have indicated they are moving away from an 'incident-based' response and this is welcomed.³³ Recent Tasmanian research has recommended enhancing current responses to family violence that include collaboration between police and specialist family violence services.³⁴ Co-

³¹ *Family Violence Protection Act 2008 (Vic)*, s7.

³² Engender Equality (2022) *Misidentification of the predominant aggressor in Tasmania: practitioner perspectives from Engender Equality*.

³³ Pridham B (2024) "[Police officers get training to better recognise coercive control in family violence, amid claims some victims misidentified](#)", *ABC News*, viewed September 2024.

³⁴ Engender Equality (2022) *Misidentification of the predominant aggressor in Tasmania: practitioner perspectives from*

responder models can reduce the risk of misidentifying the person most in need of protection and provide more consistently safe responses to victim-survivors, including involving other supports.³⁵

The ability of police to issue PFVOs lasting for as long as 12 months has been the subject of critique. However, the proposed amendments to the Act in the *Family Violence (Miscellaneous Reforms) Bill 2025* may improve the PFVO system by allowing for greater flexibility to seek a variation or revocation of a PFVO. Consideration could also be given to adopting a system similar to family violence safety notices, where a PFVO is considered an application for an FVO, which would result in greater court supervision of the process.³⁶ Potential impacts of such a change would include difficulty in securing legal representation and attending court proceedings.

Systems abuse

Systems abuse is a common occurrence and Anglicare Tasmania staff report many examples of it. For example, financial counsellors report that they often hear from single mothers following the end of a violent relationship who are not receiving child support because they fear that trying to enforce it will put them at risk of harm. Anglicare Tasmania staff reflected that child support should be mandatory so that perpetrators are accountable, if there was a way to facilitate it safely. The literature confirms that non-payment of child support is a common experience for many single mothers and their children.³⁷ The weaponisation of the child support scheme to jeopardise the financial safety of recipient parents and their children primarily affects women, who continue to carry the burden of unpaid care work in Australia (and internationally) and are overrepresented as victim-survivors of family violence.³⁸ Where victim-survivors are experiencing non-payment of child support, this also further limits their capacity to pay for suitable housing.

A victim-survivor of family violence can apply for an exemption from receiving child support. Some victim-survivors do so due to the grief and trauma of attempting to enforce payment by the perpetrator. If the exemption is granted the victim-survivor can receive more than the base rate of Family Tax Benefit A.³⁹ A consequence of an exemption is that the perpetrator is effectively rewarded for their behaviour by being released from having to pay child support. Although this is a federal system, this example is highlighted to demonstrate the way complex systems interactions can be abused. The way systems are structured can uphold systems abuse.⁴⁰

The Rapid Review of Prevention Approaches recommended Commonwealth and state and territory governments undertake an immediate audit of how perpetrators are weaponising government systems, and respond to these findings.⁴¹ It was recommended the Commonwealth Government build on work that is already underway and prioritise systems where significant harm is occurring, such as family law, child support, immigration, and taxation,⁴² and the Commonwealth Government is

Engender Equality.

³⁵ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the prevention potential: accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

³⁶ Sentencing Advisory Council Tasmania, 2015, *Sentencing of adult family violence offenders: final report no. 5*, October 2015.

³⁷ Women's Legal Services Australia (2024) [Non-payment of child support as economic abuse of women and children: a literature review](#), accessed January 2026.

³⁸ Cook K, Byrt A, Burgin R, Edwards T, Coen A and Dimopoulos G (2023) [Financial abuse: The weaponisation of child support in Australia](#), Swinburne.

³⁹ Services Australia (2026) [Why you need to apply for child support while you get FTB Part A](#), accessed January 2026

⁴⁰ Engender Equality (2025) *Systems abuse and family violence in Tasmania: evidence and recommendations for action*.

⁴¹ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the prevention potential: accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

⁴² Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the prevention potential:*

progressing work in relation to the audit.⁴³ While some common forms of systems abuse occur in federal systems, such as child support, ATO and Centrelink, Engender Equality has recommended an audit tool for Tasmanian government agencies.⁴⁴

A range of further examples of systems abuse provided by Anglicare Tasmania staff, which also highlight common examples of economic abuse, include:

- ex-partners avoiding payment of child support by doing cash-in-hand work to hide or minimise reported income, and in one case leaving a well-paying job and going onto Centrelink payments to avoid child support liability
- one parent receiving child support payments or Family Tax Benefit (FTB) despite not having care of the children, and the other being fearful to correct the arrangement for fear of antagonising them
- victim-survivors seeking financial counselling following the end of a relationship with debt due to loans taken out in their name during the relationship without their knowledge or consent, which can be increasingly easy for perpetrators to do online with access to the victim-survivor's details
- perpetrators contacting all legal services to create a conflict of interest so the victim-survivor cannot access legal assistance
- false claims of child neglect or abuse made about the victim-survivor to Child Safety Services, or to the child's school
- the perpetrator refusing to leave the home, owned or rented, and the victim-survivor having to pay double rent or mortgage so they don't incur debt or get blacklisted from rentals
- a victim-survivor paying their half of the joint mortgage held by the perpetrator, and the perpetrator redrawing that amount,
- mediation used as a tool of abuse – for example, the perpetrator reaching out to multiple service providers to request mediation. The victim-survivor then must attend the appointments with each service and explain their story as to why it's not appropriate to mediate in the circumstances. If the victim-survivor does not attend they are seen as not cooperating
- Centrelink debt: one person might get custody, and then the other is left with a Centrelink debt because they're no longer eligible for the Parenting Payment or FTB they are receiving
- a person might not want to do anything about it to avoid conflict – for example, a man raising his kids and their mother receiving FTB and not having any custody. He did not want to antagonise her, so didn't do anything about trying to get it for himself and attempted to get by without it.

Systems abuse, including economic abuse, often impacts the financial and housing circumstances of victim-survivors, requiring considerable strength and resilience. For example, the story of Ann below:

accelerating action to end domestic, family and sexual violence, Report of the Rapid Review of Prevention Approaches.

⁴³ Australian Government Department of Premier and Cabinet (n.d.) [Audit of Australian Government Systems](#), accessed February 2026

⁴⁴ Engender Equality (2025) *Systems abuse and family violence in Tasmania: evidence and recommendations for action*

Ann's story*

Ann reached out to Housing Connect seeking support with an overdue electricity bill that had built up due to circumstances connected to family violence. Despite these challenges, Ann has continued to demonstrate remarkable resilience and a strong commitment to providing a safe and stable home for her four children.

Ann has lived in her property since 2018 and has consistently maintained her tenancy. Ann openly shared the difficulties she experienced in an abusive relationship, where financial control and coercion created significant barriers to her independence. Although these situations placed enormous pressure on her, Ann continued to focus on the wellbeing of her children and worked hard to manage her household responsibilities.

When her electricity was disconnected, Ann ensured her children had somewhere safe to stay by seeking support from family and friends. While this created challenges, she continued to show determination to stabilise her situation and return to her property as soon as possible.

By accessing financial assistance, Ann has had her electricity reconnected, returned to her property, and regained the safety and stability she has worked so hard to maintain. This support has also eased the financial pressure she was facing at an already stressful time, allowing her to prioritise essential living costs for her family.

**Names and details changed to protect privacy.*

Operation of the provisions amended by the *Family Violence*

Amendment Act 2025

Anglicare Tasmania supported the *Family Violence Amendment Act 2025* which amended sections 20 and 34 of the Family Violence Act. The amendment to section 34 in relation to costs was a recommendation of Anglicare Tasmania's 2024 report *Unsafe and Unhoused*.

The amendment to section 20, to provide that an application to extend an FVO does not need to demonstrate a change in relevant circumstances since the order was last made or varied for it to be considered in court, is welcomed.

Comment on other topics

Housing as a critical response to DFV

Available and affordable housing is essential in addressing domestic and family violence. In 2024-25, 40% of all clients of Specialist Homelessness Services agencies in Australia had experienced family or domestic violence.⁴⁵ Anglicare Tasmania operates the Housing Connect Front Door Service statewide in Tasmania, which is the entry point for people to access housing support, from emergency accommodation to a long-term home. Frontline data from this service demonstrates that DFV is the main reason 1 in 10 clients seek housing support.⁴⁶

The proportion of people seeking housing assistance from Housing Connect due to DFV is significantly

⁴⁵ AIHW (2025) *Family, domestic and sexual violence: Housing*, Australian Institute of Health and Welfare, accessed February 2026.

⁴⁶ Anglicare Tasmania (2025) [Housing Connect Front Door Service Quarterly Snapshot September 2025](#), Social Action and Research Centre.

higher in the North West of the state,⁴⁷ highlighting the urgent need for this region to be prioritised in the state's housing and DFV responses.

Ideally people would not need to move from their home when experiencing DFV, but in reality they often need to leave for their own safety. Many people who have left home due to a violent partner become homeless for a period, including staying at a friend or relative's house, in a refuge or shelter, motel/hotel or caravan park, a boarding house, or sleeping rough.⁴⁸ The lack of affordable housing, including the increasing cost of private rentals and long waitlists for social housing, have consequences for the safety and wellbeing of victim-survivors and their children. The [2025 Rental Affordability Snapshot](#) found that there were no affordable rentals for several types of Tasmanian households on low and very low incomes, including those receiving Single Parenting Payment, single people on JobSeeker, and Disability Support Pension as their main source of income.⁴⁹

Women may remain living with the perpetrator of violence to keep themselves and their children housed, or opt for sub-standard housing options such as caravan parks or free camps. Where women and children move in with family and friends, this can cause overcrowding and place strain on relationships with informal supports. Staying with family and friends may be where women and children feel safest, but this may mean that their application to the housing register be considered lower priority than a family in a shelter. The Homes Tasmania policy for social housing places applicants experiencing family violence in 'standard priority', and those exiting crisis and transitional homelessness accommodation in 'highest priority'.⁵⁰

An inability to leave a violent situation due to having nowhere to go can exacerbate the stress and trauma experienced by victim-survivors. Research has found that support programs for women and children affected by DFV cannot compensate for the absence of affordable and appropriate housing.⁵¹ Frontline DFV services may be unable to provide effective support to a person if they cannot be housed in a place of safety. Anglicare Tasmania continues to advocate for a range of measures to improve access to affordable housing, including increased investment in crisis accommodation, transitional housing and social homes.⁵²

Family Violence Rapid Rehousing

The Discussion Paper highlights Family Violence Rapid Rehousing (FVRR), which is Action 15 under *Tasmania's Third Family and Sexual Violence Action Plan 2022-2027: Survivors at the Centre*.

Anglicare Tasmania has continued to highlight the lack of increase to FVRR properties⁵³ since the Tasmanian Government's announcement of an increase of funding to the program to increase the property pool from 50 to 150 properties in 2024.⁵⁴

⁴⁷ Anglicare Tasmania (2025) [Housing Connect Front Door Service Snapshot March 2025](#), Social Action and Research Centre.

⁴⁸ Australian Housing and Urban Research Institute (2022) *Housing, homelessness and domestic and family violence*, accessed February 2026.

⁴⁹ Claxton S, Bennett M and Toombs G (2025) [Rental Affordability Snapshot 2025](#), Social Action and Research Centre, Anglicare Tasmania.

⁵⁰ Homes Tasmania, 2024, [Social housing policy](#), accessed March 2026.

⁵¹ Flanagan K, Blunden H, Valentine K and Henriette J (2019) *Housing outcomes after domestic and family violence*, AHURI, Melbourne.

⁵² Anglicare Tasmania (2025) [Housing Connect Front Door Service Quarterly Snapshot September 2025](#), Social Action and Research Centre.

⁵³ Anglicare Tasmania (2025) [Housing Connect Front Door Service Quarterly Snapshot September 2025](#), Social Action and Research Centre.

⁵⁴ Homes Tasmania (2026) [Homes Tasmania Dashboard January 2026](#), accessed March 2026.

More recent changes to the FVRR program have combined these properties with Private Rental Incentive Scheme properties under the Affordable Private Rentals property pool.⁵⁵ This is concerning as it removes features of the previous program, including that the FVRR properties were exclusively available to families experiencing DFV, and a funding allocation for each tenancy was provided to allow property management to provide some basic furniture items and waive bond payments. The program changes results in a change to the prioritisation of applications for FVRR properties, as the Affordable Private Rentals program follows Homes Tasmania's policy for social housing allocations. As above, under this policy families experiencing family violence are not in the highest priority category.⁵⁶

The interaction between housing, child protection involvement, and income support payments

The interaction between payments, housing, and services can cause further barriers for victim-survivors of family violence. For example, where Child Safety Services removes children due to inadequate housing situations such as homelessness, the household income can then be reduced as the parent is no longer eligible for Family Tax Benefit allowances. The family can only reunite if stable housing is found. However, their capacity to pay for suitable housing with sufficient bedrooms is reduced due to the withdrawal of the Centrelink benefit. In other circumstances, the person may be receiving Parenting Payment which is then reduced to single person payment. These situations can trap people in a cycle of disadvantage and fail to support families in their parenting role. Anglicare Tasmania's 2018 research report [In Limbo](#) explored this issue and recommended a suite of stable accommodation options for family reunification.⁵⁷

Liquor licensing and gambling reform

The Rapid Review recommended that governments review and amend alcohol and gambling regulatory environments to prioritise the prevention of domestic, family and sexual violence. This includes through restrictions on alcohol sale, advertising and delivery timeframes, restrictions leading to a total ban on advertising in gambling, and an examination of the density of electronic gaming machines and use of online gambling in relation to domestic, family and sexual violence prevalence.⁵⁸ Review of liquor licensing requires consideration of the role of alcohol in prevention, and Anglicare Tasmania supports the submissions made by the Tasmanian Family and Sexual Violence Alliance⁵⁹ and the ATDC in response to liquor licensing reforms on this issue.⁶⁰

Limited services

Victim-survivors often need a range of supports including legal, financial, and mental health services. Limited capacity of services and high demand results in difficulties for victim-survivors seeking a range of DFV services. This includes long waitlists for specialist family violence counselling and for children's trauma counselling, and limited capacity of legal services.

⁵⁵ Homes Tasmania (2026) [Affordable private rentals](#), accessed January 2026

⁵⁶ Homes Tasmania, 2024, [Social housing policy](#), accessed February 2026

⁵⁷ Fidler L (2018) [In Limbo](#), Social Action and Research Centre, Anglicare Tasmania.

⁵⁸ Campbell E, Fernando T, Gassner L, Hill J, Seidler Z and Summers A (2024) *Unlocking the prevention potential: accelerating action to end domestic, family and sexual violence*, Report of the Rapid Review of Prevention Approaches.

⁵⁹ Tasmanian Family and Sexual Violence Alliance (2026) '[Submission to the Review into the Tasmanian Liquor Licensing Act 1990](#)', accessed January 2026

⁶⁰ Alcohol Tobacco and Other Drugs Council of Tasmania (2026) '[Letter addressing proposed liquor licensing reforms](#)', January 7 2026, accessed January 2026