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Victims of Crime Assistance League (Hunter) NSW

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Family Law Amendment (Federal Family Violence Orders) Bill 2021

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About VOCAL

Victims of Crime Assistance League Hunter NSW (VOCAL) is an Incorporated Charity organisation that supports men, women and children who are victim-survivors of any crime type throughout NSW. For the past 30 years we have been providing information, guidance and support to individuals and families who have been impacted by crime. We act in a consultative capacity to State and Federal governments on matters pertaining to victims' rights.

VOCAL's Victim Support Unit receives funding from NSW Department of Communities and Justice (Victims Services) to provide a free service to victims of crime in NSW's Hunter Region. Support is individualised to the specific needs of each survivor and includes physical, psychological and socioeconomic support and assistance.

The support we provide around legal processes includes procedural information and advocacy with Apprehended Domestic Violence Orders (ADVOS), Personal Violence Orders (PVOs), court preparation and support, Mental Health Tribunal matters, Parole Submissions, Coroner's Court matters and Family Court custody matters.

Female victims of family violence present to our service with significantly different experiences and disclosures of family violence to that of male victims. Recognizing the gendered nature of domestic and family violence, our submission refers to women and children as victim-survivors, and men as perpetrators of family violence.

We note that while Federal Family Violence Orders (FFVO) may be available Australia wide, our submission provides suggestions and recommendations of how Federal Family Violence Orders can work within existing NSW policies and procedures and provide support to victim-survivors and children who continue to suffer from family violence and post separation abuse.

Key points this submission will address include:

- System Reform:
  - A national definition of Family Violence.
- Federal Family Violence Orders:
  - Training for judicial professionals,
  - Consistency in Civil protection orders,
  - Coercive control within the Family Law Act, and
  - Mandatory referral pathways when making a federal family violence order.
- Criminally endorsing federal family violence orders:
  - State training, accountability and resources.
- Child Welfare and Family Violence:
  - Policing of family violence where children are involved and,
  - The inconsistency between 'the best interests of a child' and child safety.

System Reforms

VOCAL Inc NSW strongly supports the Family Law Amendment (Federal Family Violence Orders) Bill 2021 and has confidence in its uniformity with the National Plan to Reduce Violence Against Women and Their Children 2010-2022; however, VOCAL has also identified potential barriers that may affect the implementing of such an order and believe that the Bill could possibly be limited under the current State and Federal systems.

A national definition of Family and Domestic Violence

Presently there is no consistent national definition on what constitutes family and domestic violence (FDV). Both Federal and State Governments promote different versions of what constitutes FDV and this creates confusion for victim-survivors. NSW family violence legislation defines domestic violence as an offence committed by an individual who is in a domestic relationship with the victim, by referring to 55 'personal violence' offences in the Crimes Act

1900 (NSW)[1]. However, Section 4AB of the Family Law Act 1975 , specifically 4AB(3)(4), identifies that child exposure to violence (either by primary or secondary victimization) is an acknowledged form of family violence and therefore a reportable offence[2]

Nevertheless, State and Federal response to reported Family Violence (child physical and/or sexual abuse) shows the following inconsistencies;

- Current practice shows that when victim-survivors report physical or sexual violence against their child, the State response from police and child protection is to assist protective parents to keep the child safe, engage support services, and limit physical contact with the abusive parent.

- In Federal jurisdiction, despite evidence from police, child protection, medical and/or psychological professionals, our experience is that the Federal/Family Court routinely places greater weight on the abuser's parental rights over child safety.

- The end result is one of unpredictability; protective parents are instructed by the State to keep the child away from the alleged perpetrator, while the Federal Courts insist the child has regular contact with their abuser, with the majority of victim-survivors being directly ordered to facilitate contact between the child and abusive parent, regardless of the child's wishes.

VOCAL identifies that without a standardized definition of what constitutes FDV, the actions of Federal and State Courts (including police) will inadvertently put victim-survivors at an increased risk of harm due to inconsistencies in jurisdictional responses to victim-survivor protection.

[1] Australian Law Reform Commission, 2021.
[2] Family Law Act 1975.

Federal Family Violence Orders

VOCAL Inc. NSW overwhelmingly supports the introduction of Federal Family Violence Orders and is hopeful the Bill reduces some of the inconsistent, systemic approaches that Federal and State courts have in response to victim-survivor protection during family violence.

Reducing a victim-survivor's exposure to multiple courts is a significant step forward in addressing the risk of ongoing psychological harm that domestic abuse creates. Many women, in a state of heightened alert, anxiety and/or trauma have difficulty in retelling, reporting and giving evidence about the abuse they have suffered. Add to this a crisis of homelessness, financial insecurity, post separation abuse and parenting children through family violence, many women are reluctant to apply for State protection orders due to fear of retribution.

VOCAL's work in post separation abuse provides us with significant insight into systemic gaps in State and Federal responses when it comes to family violence and parenting matters. We submit the following recommendations for consideration, to ensure that victim-survivor protection is maximized under FFVOs.

Urgent family violence training for federal court professionals.

For many years VOCAL have advocated that court professionals dealing with family violence and child protection custody matters must be adequately trained with up to date qualifications. The concern about the lack of accreditation is not a new issue, and has been examined by previous inquires however it remains that at present, family consultants are not required to undertake any formal family violence training[3]. We strongly believe that without appropriate training and credentials, identifying family violence risk factors will remain problematic for many federal court professionals, increasing the risk to victim –survivors.

[3] Better Place Australia (2019) . *Response to the Joint Select Commitee of Australia's Family Law System.* Submission 229 p.64.

Currently in NSW, both Police and FDV practitioners often refer to the Domestic Violence Safety Assessment Tool (DVSAT) to identify the level of immediate risk to victims of FDV. This tool provides both responding police and FDV practitioners an immediate overview of the situation and affords direction on appropriate responses. Currently, if a DVSAT returns a score higher than 12 it is immediately referred to a Safety Action Meeting (SAM) where a comprehensive safety plan is developed. This is created with the input of NSW Police, NSW Health, Department of Communities and Justice, and numerous other government and non-government agencies, and can successfully reduce the risk of significant harm to victim-survivors and their children. Presently, VOCAL is unaware of any such tools being utilized in the Federal Courts despite statistical evidence highlighting the increased risk of violence to victim-survivors and children once a matter has reached the Federal jurisdiction.

VOCAL remains concerned that Federal Judicial Officers are not familiar with family violence dynamics and therefore may not apply for or even grant an FFVO. VOCAL also identifies that while this could simply be a lack of knowledge and understanding of current State responses to FDV and its necessity to identify the immediate risk using concise and up-to-date tools, such as a DVSAT, in order to reduce the risk of serious harm to the victim-survivor and children; it could also be a simple personal bias to DFV which inevitably will impact the end result.

VOCAL continually observes limited insight from Federal Judicial professionals into family violence behaviors, post separation abuse and child trauma responses, and stand witness as it leads to victim blaming and perpetrator enabling. Until theses serious issues are addressed within the Federal system women and children will remain at immediate risk of harm due to the perpetrator's parental rights outweighing victim safety. This will subsequently leave the only option for protection through the State Courts, thus reducing the effectiveness of the FFVO Bill.

Consistency in Civil protection orders

VOCAL recognizes that the conditions of the FFVO and NSW ADVOs are similar in nature and that these orders are designed to serve as a warning to perpetrators of violence to modify their behavior(s). We acknowledge that many DV perpetrators ignore civil protection orders and for maximum offender accountability it would be essential to make FFVO conditions simple to understand therefore reducing offenders insisting they did not understand the condition of the order.

The proposed terms of order for a FFVO in S8(a-h) are extensive and may be difficult for people without a legal background to interpret. Annexure A compares both State (NSW) and the proposed Federal orders and highlights the complicated, legal jargon of the FFVO and how it may create barriers with compliance. Despite the 2016 introduction of Plain English ADVO's, BOSCAR indicates the breach conviction rates increased by 10% since January 2019[4] . We fear that complicated legal wording of FFVO will create misperception and justifications for offender's behaviors and therefore VOCAL recommend that FFVOs are written in plain English. VOCAL also recommends that consultations with both State Police and FDV practitioners is vital when creating FFVO's as front line knowledge is imperative in achieving maximum results.

Cross jurisdictional practices for protection orders are inevitable, as 'the Bill allows for State and territory courts to revoke or suspend a FFVO when they are making or varying a state family violence order'[5] . For this reason, VOCAL proposes considering whether FFVOs can be the same conditions as its relevant State or Territory protection order. For example, in NSW a FFVO would mirror the NSW ADVO conditions. Interpretation by judicial officers remains subjective, and not only will the consistency of civil protection orders alleviate confusion between litigants, professionals and Courts, it will assist police in responding to criminal breaches.

[4] *BOSCAR* . (n.d.). Retrieved from https://www.bocsar.nsw.gov.au/Pages/bocsar_media_releases/2020/mr-NSW-Recorded-Crime-Statistics-Quarterly-Update-Sept-2020.aspx

[5] Tehan, M. (2021, March 24). *House of Representatives2.* Retrieved from Parliament of Australia: https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=chamber/hansardr/d64bba7e-9b55-427c-aef1-2c98b347651d/&sid=0015

Coercive Control within the Family Law Act 1975

There is a vast amount of research indicating coercive control underpins family violence. Coercive control increases significantly throughout child custody matters and is knowingly detrimental to victim-survivor's physical health, psychological safety and financial standing[6]. VOCAL has observed a number of cases where a perpetrator will use the Family Law Courts as a weapon in order to continue to abuse and control their victim despite the Family Law Act 1975 stating *"Family violence means violent, threatening or other behaviors by a person that coerces or control a member of the person's family or causes the family member to be fearful*.[7]

VOCAL wish to highlight that due the complexity of coercive control. The current Family Law structure has the ability to force a victim-survivor to disregard the professional directive of ceasing/restricting child contact with a perpetrator, instead instructing the victim-survivor to "work with' their abuser for the "sake" of their child(ren). This in turn tips the balance of control back into the favor of the abuser and increases the risk of violent behaviors for both primary and secondary victims of FDV.

VOCAL recommends that it is imperative for the FFVO to specifically reference coercive control due to the extreme imbalance of power within the Family Law Jurisdiction. VOCAL also recommends the use of clear and consistent language when directing family violence perpetrators to cease/restrict coercive behaviors.

Mandated referral pathways when applying for a FFVO

VOCAL identifies that two mandated interventions should occur at the time of applying for a FFVO;

1) Victim-survivor agency support;
2) Perpetrator accountability and support.

[6]*NSW Bureau of Statistics and Research.* (2021, June 10). Retrieved from Apprhended Violence Orders (AVO): https://www.bocsar.nsw.gov.au/Pages/bocsar_pages/Apprehended-Violence-Orders-.aspx

[7] Family Law Act 1975, S4 (AB).

1) Victim-Survivor Agency Support

At the time of completing the statutory assessment for the FFVO, VOCAL recommends mandatory referral processes be implemented to increase support and reduce risk of harm to victim-survivors. This should include a mandatory government child protection notice within a 24-hour time period of the FFVO application. This child protection notice should include all the names of children under the age of 18 years who reside with either parent. This notice should also highlight the increased risk of harm to the children and the agency should then act upon this information within a timely manner.

VOCAL also recommends (with reference to NSW) that a mandatory referral be made to the Women's Domestic Violence Court Advocacy Service (WDVCAS) Local Command Point, and all FFVO cases automatically placed on a safety Action Meeting (SAM). These interventions will be in line with all NSW State reported domestic violence and/or child protection matters, where police are mandated to refer domestic violence victims to the Local Command Point for risk assessment and support options.

VOCAL works closely with both WDVCAS and the Family Advocacy Support Service (FASS) and believe that WDVCAS are better situated to receive, respond and refer to the safety needs of victims-survivors. VOCAL strongly believes that having a mandated referral pathway attached to the FFVO process will ensure a comprehensive, wrap around support for victims at risk of ongoing family violence.

2) Perpetrator accountability and support

Until perpetrators of family violence face real and meaningful consequences for abusive behaviors, both State and Federal jurisdictions will not see a reduction in violence against women and children. We know through extensive anecdotal evidence, research and inquiries, that children are put at increased risk of harm when perpetrators are not held accountable for family violence. The current Family Law structure sends a clear message that violent perpetrators are still entitled to

have access to their children, irrespective and regardless of the physical, psychological, or sexual harm already inflicted upon the victim-survivors.

VOCAL strongly recommends that a mandated referral be made to a behavioral change program such as the court appointed program ENGAGE.[8] This will ensure that the onus is on the perpetrator and would hopefully assist in reducing recidivism.

Criminally Enforcing Federal Family Violence Orders

VOCAL agrees that criminally enforcing FFVOs is favorable over contraventions. Victim-survivor experiences with contraventions is that they are time consuming, costly and can put the victim in further danger of physical and psychological harm. Feedback from victim-survivors is that solicitors advise not to lodge contraventions for breach of court orders because the process is lengthy, costly and the consequences for a breach are minimal. For this reason, VOCAL is supportive of making the State responsible for criminally enforcing breaches of FFVO, although we have reservations and concerns as to how this will be effectively managed.

Research indicates that the time of separation is an amplified period of danger for victim- survivors [9]. Victim-survivors report abuse escalation through way of harassment, intimidation, stalking, verbal abuse, financial abuse, emotional blackmail, restricting child support, litigation abuse, and can escalate to homicide. However, victim-survivors may not always recognize FDV where there has been a prolonged history of coercive and controlling behaviors with the absence of physical violence, therefore when separation occurs, the perpetrator may experience an intense sense of loss of control and the violent response can be more sever, life threatening or lethal[10]. This is extremely evident in the 2020 high profile case of a mother and her three young children being murdered by her estranged husband who she had recently separated from. Family of the victims, have on

[8] *NSW Communities and Justice.* (n.d.). Retrieved from http://www.crimeprevention.nsw.gov.au/domesticviolence/Pages/Our-programs-Engage.aspx

[9] Douglas, H. (2017). *Legal Systems Abuse and Coercive Control.* . Retrieved from https://law.uq.edu.au/files/28536/Douglas%20Systems%20Abuse%202017.pdf

[10] Australian Institute of Health and Welfare. (2020, October 19). *Australian Government: Australian Institute of Health and Welfare.*

numerous occasions, spoken publicly about the coercive control committed by the perpetrator over a prolonged period of time. After the separation the perpetrator was granted visitation with their children, however after kidnapping one of them, visitation was denied until the mediation process was completed. While the victim's family have commented on the absence of physical violence throughout the marriage, they have stated that the perpetrators controlling behaviors escalated post separation and kidnapping, resulting in the first, but fatal, act of violence[11]. This case, unfortunately, is indicative to the risk to victim-survivors post separation and speaks volumes to the extreme necessity of criminally enforcing FFVO.

This said, VOCAL acknowledges that breaches of FFVO can be difficult to prove for many victim-survivors, as is the case with ADVO breaches due to absence of physical evidence. VOCAL also identifies that criminally enforcing FFVOs may be problematic (in examples of The Bill S8(d)) where both parents attend children's sport, extra circular activities and school events.

State Training, Accountability and Resources

If police are to be responsible for criminally enforcing FFVO, VOCAL recommends a review of current police practices towards family violence and child custody matters. The police response to many victims-survivors of post separation abuse when children are involved is simply terrible, with common practice being that police are extremely reluctant to become involved in family violence matters that involve current or potential child custody arrangements. Instead of perpetrator accountability, the onus of responsibility is placed back on victim-survivors who are encouraged to install CCTV, keep a journal of abuse, and remain engaged with support services. The perpetrator's abusive behaviors remain unaddressed and under monitored. There is a significant risk that police will continue to direct victim-survivors to have their matter listed in family court and obtain a FFVO, rather than placing accountability on the perpetrator. Again, this increases the risk of post-separation escalation of abuse, placing victim survivors at a higher risk of violence.

[11] Rachel Rigna. (2021). *Hannah Clarke's parents push for coercive control to be made a crime one year on from horrific murders.*

As previously stated, it is challenging to report non-physical acts of domestic abuse and this will continue to create barriers with victim-survivor protection as police will be reluctant, or unable, to charge for breaches. We acknowledge that giving police the responsibility to criminally enforce FFVO will add significant pressure on an already overloaded Police Force, and urge for more resources and training to be provided to police.

Child Welfare and Family Violence

Policing of Family Violence where children are involved.

Victim-survivors report that police routinely inform them their 'issue' is a Family Court matter and direct them to engage a solicitor. It is VOCAL's experience that police are reluctant to obtain a statement from a child that relates to their parent, therefore neglecting the immediate danger. If a FFVO is ordered specifically for the protection of a child, and it is breached, we envisage issues to occur with police pursuing breaches where a child is required to give evidence against their parent. VOCAL recommends that this highlighted concern needs to be addressed immediately if State police are tasked with enforcing FFVO. Suitable police response needs to be extensively developed in accordance with child protection policies, to ensure maximum safety when policing FFVO.

'In the Best Interests of the Child' over-rules 'Child Safety'

We hope that the introduction of FFVO leads a shift in practitioners prioritizing child safety needs over the court's requirement for the child to have a meaningful relationship with both parents, yet in practice, VOCAL have witnessed legal authorities making decisions in the best interest of the child, without having full comprehension of the child behaviors, trauma reactions and post separation family violence risk. Despite the child saying they are scared of the abusive parent, do not want to spend long periods of time with the abusive parent, or do not want to stay overnight with the abusive parent, the victim-survivor is still ordered by court orders to facilitate regular contact. The message to child victim-survivors is inconsistent and disempowering. They are

encouraged to tell a trusted adult, talk to psychologists or school teachers about violence or abuse. Children believe if they tell an adult they will be protected from ongoing harm. Unfortunately, many disclosures are ignored, minimized, trivialized and dismissed by Federal Court legal professionals because professional bias of victim–blaming, and that parental rights outweigh child safety. This mirrors the findings of the Royal Commission into Institutional Child Sexual Abuse, ICLs and family consultants, expert witnesses, Registrars and Judges need to be accountable for their decisions to expose a child to ongoing harm.

Many victim-survivors report while a matter is in the Federal Court, perpetrators minimize, ignore or dismiss medical advice from the child's treating professionals. This includes GPs, psychologist, speech pathologists, and pediatricians. Without both parents' consent, the child is prevented from receiving recommended treatment and/or medication. Many victim-survivors report that the Family Court system minimizes this form of abuse, fails to address the significant impact it has on the best interest of the child and priorities shared parental responsibility.

VOCAL recommends ongoing, mandated training for all Federal and Family Jurisdiction practitioners to ensure the ongoing safety of children named as a protective person on a FFVO within the Family Law Circuit.

Conclusion

Despite overwhelming research that indicates children are impacted by family violence in the absence of physical abuse, VOCAL questions why shared parenting responsibility is prioritized over mother and child safety when there is a risk of ongoing harm. It is both a social and systematic failure that sees a victim-survivor being encouraged by the State to keep her and her children safe, while opposing Federal practices insist the victim-survivors maintain contact with the abuser. While VOCAL support the proposed Family Law Amendment (Federal Family Violence Orders) Bill 2021, we do make reference to the above concerns and are hopeful that our experience is helpful in creating meaningful systemic change to help further protect victim-survivors of family violence.

Annexure A

Plain English NSW ADVOs compared to FFVO Terms of Order (recommendations)

Behavior	ADVO Conditions	FFVO Terms of Order
Standard Protection	1. You must not do any of the following to the protected person or anyone the protected person has a domestic relationship with: a) Assault or threaten them b) Stalk, harass or intimidate them, and c) Intentionally or recklessly destroy or damage any property that belongs to or is in the possession of them d) Must not harm an animal that belongs to or is in the possession of the protective person	8(a) Prohibiting the person against whom the order is directed, from subjecting the protective person to family violence, or, if the protective person is a child, from subjecting or exposing the child to family violence *VOCAL recommends that this condition aligns closer with the ADVO and is simplified in language, ensuring that the standard orders are clear and concise across both State and Federal jurisdictions.*
No Contact	2. You must not approach the protected person or contact them in any way, unless the contact is through a lawyer.	8(b) Prohibiting the person against whom the order is directed from contacting the protected person *VOCAL recommends that this condition aligns closer with the ADVO and is simplified in language, ensuring that the*

		standard orders are clear and concise across both State and Federal jurisdictions. VOCAL also recommends that this make specific reference to child's school/sporting events/extracurricular activities.
Must not approach	3. You must not approach: a) The school or any other place the protected person might go to or study b) Any other place listed here__.	8(g) Requiring the person against whom the order is directed to leave a place or area if: (i) The protected person is at that place or area at a particular time; (ii) the protected person is at the same place or area at the same time; and (iii) the protected person requests the person against whom the order is directed to leave the place or area, or if the protected person is a child, the parent or guardian of the child requests the person against whom the order is directed to leave the place or area; and (iv) the person making the request considers that the protected person is at imminent risk of being subjected to family violence at that time, or if the protected person is a child, subjected or exposed to family violence at that time; *VOCAL recommends that this condition aligns closer with the ADVO and is simplified in language, ensuring that the standard orders are clear and concise*

		across both State and Federal jurisdictions. VOCAL also recommends that this make specific reference to child's school/sporting events/extracurricular activities.
Alcohol and Drugs	4. You must not approach or be in the company of the protected person for at least 12 hours after drinking alcohol or taking illicit drugs	*VOCAL recommends that a similar condition be made in the FFVO for alcohol ONLY with a larger time frame (24 to 48 hours). VOCAL recommends contact be revoked should perpetrator be in the possession of illicit drugs.*
Must not find	5. You must not try to find the protected person except as ordered by a court	8(e) Prohibiting the person against whom the order is directed from attempting to locate protected person.
Must not approach	You must not approach the protected person or contact them in any way, unless the contact is; a) through a lawyer, or b) to attend accredited or court-approved counselling, mediation and/or conciliation, or c) as ordered by this or another court about contact with children, or d) as agreed in writing between you and the	*VOCAL recommends that the FFVO includes ONLY;* *You must not approach the protected person or contact them in any way*

	parent(s) about contact with child/ren, or e) as greed in writing between you and the parent(s) and the person with parental responsibility for the child/ren about contact with the child/ren.	
Home address	7. You must not live at: a) the same address as the protected person, or b) any place listed here__.	*VOCAL recommends that this condition be mirrored on the FFVO*
Restricted areas	8. You must not go into: a) any place where the protected person lives, or b) any place where they work, or **c)** Any place listed here___.	8 (d) Prohibiting the person against whom the order is directed from being within a specified distance of a specified place or area that the protected person is, or is likely to be, located: *VOCAL recommends that this condition aligns closer with the ADVO and is simplified in language, ensuring that the standard orders are clear and concise across both State and Federal jurisdictions.*
Distance	9. You must not go within___metres of:	8(c)

	a) Any place where the protected person lives, or b) Any place where they work, or c) Any place listed here__.	Prohibiting the person against whom the order is directed from being within a specified distance of the protected person *VOCAL recommends that this condition aligns closer with the ADVO and is simplified in language, ensuring that the standard orders are clear and concise across both State and Federal jurisdictions.*
Firearms	10. You must not possess any firearms or prohibited weapons	*VOCAL recommends that this conditon be mirrored on the FFVO*
Contact via 3rd person		8(f) prohibiting the person against whom the order is directed from causing, or attempting to cause, another person to engage in conduct in relation to the protected person that would, if the conduct were done by the person against whom the order is directed, breach the order; *VOCAL recommends this condition remain on the FFVO*

References

Australian Law Reform Commision . (2021, June). *Australian Government*. Retrieved from https://www.alrc.gov.au/publication/family-violence-a-national-legal-response-alrc-report-114/5-a-common-interpretative-framework-definitions-in-family-violence-legislation-3/current-definitions-in-family-violence-legislation/

Australian Institute of Health and Welfare. (2020, October 19). *Australian Government: Australian Institute of Health and Welfare.* Retrieved from AIHW media releases: New report sheds light on sexual assault in Australia: https://www.aihw.gov.au/news-media/media-releases/2020/august/new-report-sheds-light-on-sexual-assault-in-austra

Better Place Australia. (2019). *Response to the Joint Select Commitee of Australia's Family Law System.* Submission 229 p.64.

BOSCAR . (n.d.). Retrieved from https://www.bocsar.nsw.gov.au/Pages/bocsar_media_releases/2020/mr-NSW-Recorded-Crime-Statistics-Quarterly-Update-Sept-2020.aspx

Douglas, H. (2017). *Legal Systems Abuse and Coercive Control. .* Retrieved from https://law.uq.edu.au/files/28536/Douglas%20Systems%20Abuse%202017.pdf

Family Law Act 1975 - Sect 4AB. (n.d.). Retrieved from Commonwealth Consolidated Acts: http://classic.austlii.edu.au/au/legis/cth/consol_act/fla1975114/s4ab.html

NSW Bureau of Statistics and Research. (2021, June 10). Retrieved from Apprhended Violence Orders (AVO): https://www.bocsar.nsw.gov.au/Pages/bocsar_pages/Apprehended-Violence-Orders-.aspx

NSW Communities and Justice. (n.d.). Retrieved from http://www.crimeprevention.nsw.gov.au/domesticviolence/Pages/Our-programs-Engage.aspx

Rachel Rigna. (2021). *Hannah Clarke's parents push for coercive control to be made a crime one year on from horrific murders*. Retrieved from ABC News: https://www.abc.net.au/news/2021-02-14/qld-hannah-clarke-domestic-violence-murder-anniversary-brisbane/13137484

Sutherland, G., McCormack, A., Pirkis, J., & Vaughan, C. (n.d.). *Media Representations of Violence Against Women and Their Children: Final Report.* Melbourne: Australia's National Research Organisation for Women's Safety Limited (ANROWS).

Tehan, M. (2021, March 24). *House of Representatives2.* Retrieved from Parliament of Australia: https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=chamber/hansardr/d64bba7e-9b55-427c-aef1-2c98b347651d/&sid=0015