



Submission cover sheet

Inquiry into the Crimes (Coercive Control) Amendment Bill 2026

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Executive Summary

ACT Policing thanks the Standing Committee on Legal Affairs for the opportunity to make a submission to the *Inquiry into Crimes (Coercive Control) Amendment Bill 2026* (the **Bill**) and acknowledges the ACT Government's commitment to addressing domestic, family and sexual violence (DfSV) in the Territory through various initiatives and policy development. Implementing effective domestic, family and sexual violence prevention and response measures continues to be a priority area and ACT Policing remains committed to initiatives that enhance the safety of the ACT community in relation to family, personal and sexual violence.

As a starting point, ACT Policing supports the establishment of a standalone coercive control offence, as it strengthens legal protections for victim survivors and recognises the evolving understanding of domestic, family and sexual violence. It also supports earlier responses to DfSV and recognises coercive control as an inextricable part of DfSV.

ACT Policing has welcomed its engagement in the ACT Government's Ministerial Steering Committee on the Criminalisation of Coercive Control, contributing operational insights and working collaboratively with legal, community, and advocacy partners. This approach has supported the development of a considered, evidence-based standalone offence that responds to the needs of the ACT community. ACT Policing welcomes continued engagement and collaboration with partners to support effective implementation of these reforms.

Over recent years, ACT Policing has continued to refine its response to DfSV, in recognition of the upward trend of calls for assistance for DfSV matters. Expanding upon the former Family Violence Unit, ACT Policing established the Domestic & Family Violence Investigation Unit (DFVIU) to focus on holding high-risk perpetrators to account and employs a holistic investigations model. The DFVIU has strengthened our capability to work with partner agencies to investigate DfSV incidents with the aim of better supporting victim survivors and working to prevent DfSV occurring in the ACT.

Supported by funding from the ACT Government, ACT Policing co-designed the development of the Enhanced Domestic and Family Violence Program (EDFVP), which was delivered across the workforce in 2025-2026. The training featured academic-designed modules spanning family violence dynamics, victim-centric and trauma-informed responses, and coercive control. Recognising that DfSV is a significant and complex part of ACT Policing's work and that our decisions have a direct impact on victim-survivor safety and community confidence, the training was declared mandatory for all operational members up to Superintendents. The training and establishment of the DFVIU signals another important step to improving ACT Policing's capability to respond to complex DfSV incidents and recognise victim-survivors experience of DfSV as a continuum rather than stand-alone incidents.

ACT Policing recognises coercive control as a serious pattern of harmful behaviour underpinning DfSV and evidence demonstrates that it is strongly linked to intimate partner homicide. The proposed offence reflects contemporary understanding of family violence as cumulative, pattern-based conduct, rather than a series of isolated incidents. It also aligns with approaches in other Australian jurisdictions that have already commenced or committed to introducing a standalone offence for coercive control. It is also consistent with the ACT's *Domestic, Family and Sexual Violence Strategy 2026–2036*, including Outcome 3, which focuses on strengthening responses to persons using violence and holding perpetrators to account. We acknowledge the Government's

broader work to strengthen responses to DFSV, including the proposed introduction of a Family Violence Safety Notice scheme, and recognise the complexity of this reform and the breadth of stakeholder input informing the legislation.

This submission supports establishing a standalone coercive control offence in the ACT, subject to agencies, including ACT Policing, receiving the necessary funding to implement the reforms. Effective implementation will depend on adequate resourcing, training, and system readiness for safe delivery. This includes early and coordinated investment throughout the implementation period. The submission also acknowledges the practical challenges associated with investigating and prosecuting a course of conduct offence, noting that experience in other jurisdictions demonstrates relatively low charging rates and lengthy investigation timeframes due to the complexity of evidence gathering, victim engagement, and the need to establish patterns of behaviour over time.

We note the Bill delays commencement of the offence by two years following notification, which ACT Policing supports to ensure that all impacted agencies and services are operationally ready and resourced appropriately to effectively implement the Bill. Further, the Bill proposes a broad scope of relationships. While broadly supportive of this approach, the ACT's approach extends beyond the more confined approach of intimate partner relationships that most Australian jurisdictions have adopted and will require careful implementation, particularly given the limited operational experience with similar models elsewhere.

Key Considerations

In 2025-26, ACT Policing responded to 4371 Domestic and Family Violence incidents, which is an increase of 30.8 per cent over 5 years. This constitutes an average of 12 Domestic and Family Violence incidents per day in 2025-26.

ACT Policing **supports** the introduction of a standalone offence criminalising coercive control to better reflect the reality of DFSV. Coercive control is widely recognised as a central feature of DFSV, reframing it from a series of discrete incidents to a sustained pattern of domination and control¹. Rather than being limited to physical violence, DFSV is understood as encompassing a range of behaviours used to exert power over a victim-survivor. These include psychological abuse, intimidation, surveillance, financial control, and social isolation. This pattern-based understanding emphasises that harm arises not only from individual acts, but from the cumulative and ongoing

¹ Government of South Australia. (2025). With courage: South Australia's vision beyond violence (Report No. 1). Royal Commission into Domestic, Family and Sexual Violence. Accessed at: https://www.royalcommissiondfsv.sa.gov.au/_data/assets/pdf_file/0006/1174695/With-Courage-Report.pdf; Australia's National Research Organisation for Women's Safety (ANROWS). (2021). Defining and responding to coercive control: Policy brief. Sydney: ANROWS.

nature of coercive behaviours. As such, coercive control is increasingly identified as both a defining characteristic of DFSV and a known precursor for intimate partner homicide². According to the NSW Domestic Violence Death Review Team, coercive control was present in around 97 per cent of intimate partner domestic violence homicides in New South Wales (NSW) from 2000 to 2022³.

Coercive control as a standalone offence recognises DFSV as a pattern of behaviour, improving legal protection for victim-survivors, enhancing community awareness and early intervention around coercive control, and ensuring no further harm is caused to vulnerable people. Coercive control has been established as a standalone criminal offence in NSW, Queensland (QLD), and South Australia (SA). Tasmania also provides for standalone criminal offences relating to economic abuse and intimidation, which may encompass coercive control. The Victorian and Western Australian Governments have also committed to introducing coercive control as a standalone offence and we commend the ACT Government for taking this important step toward its criminalisation.

Scope of relationships

In Australian jurisdictions, the scope of relationships captured by coercive control offences varies. In NSW and SA, the legislation is limited to former or current intimate partner relationships. In contrast, QLD has adopted a broader approach, extending the definition to include former or current intimate partners, family relationships, and informal care relationships.

The proposed ACT legislation adopts a comparatively expansive approach. It applies to a wider range of relationships as defined under the *Family Violence Act 2016*, including a domestic partner or former domestic partner, an intimate partner or former intimate partner, a relative, a child of a domestic partner or former domestic partner, and a parent of a child of the person. This broader definition extends the application of the offence beyond intimate partner relationships to capture a wider spectrum of family and domestic relationships.

While recognising that coercive control can cause significant harm across all DFSV relationships, during the initial consultation process ACT Policing had considered a more staged approach to implementation, whereby the scope of relationships would initially focus on former or current intimate partners, with the potential to expand over time to other domestic relationships. This approach aligns with the NSW model, where initial legislation focused on current or former intimate partners, with any expansion of captured relationships considered through a legislated Minister's

² Government of South Australia. (2025). *With courage: South Australia's vision beyond violence* (Report No. 1). Royal Commission into Domestic, Family and Sexual Violence. Accessed at: https://www.royalcommissiondfsv.sa.gov.au/_data/assets/pdf_file/0006/1174695/With-Courage-Report.pdf

³ New South Wales Government. (2024). Domestic Violence Death Review Team Report 2021-2023. Accessed at: <https://www.nsw.gov.au/media-releases/domestic-violence-death-review-team-report-2021-2023>

review of broadening this offence to relationships other than current and former intimate partners (s 54J(2)(b)). In NSW, limiting the initial scope to intimate partner relationships was intended to reduce the risk of misidentification and recognise that coercive control manifests differently across relationship types, with evidence indicating that escalation to serious harm, including homicide, most commonly occurs in intimate partner contexts⁴. This was an important consideration to avoid potential unintended consequences of over-criminalisation in complex and nuanced relationship dynamics. This approach would have been consistent with the staged implementation methodology adopted in other reform contexts, such as the minimum age of criminal responsibility, and would allow the offence to be operationalised, tested, and embedded before broader application.

ACT Policing is mindful of the potential operational and resourcing impacts associated with a broad scope approach. We note that an expanded cohort of relationships may increase reporting volumes, increase impacts on general duties and investigative resources, and require officers to make complex judgements in sensitive and heightened environments. Consideration should also be given to the availability of appropriate referral pathways for victims and perpetrators, recognising that existing DFSV service models have predominantly focused on intimate partner relationships and may require adaptation or increases to service offering to support a broader cohort.

Scope of behaviours

ACT Policing supports the current drafting of the Bill which aligns the scope of behaviours captured by the proposed offence with those recognised as family violence under the *Family Violence Act 2016*. This alignment promotes consistency in application and reflects behaviours that are already well understood by police. It also supports operational clarity, as existing training, guidance, and policies are already based on this framework and can be more readily adopted, facilitating a more coherent and effective policing response.

The existing definition of family violence already captures a range of controlling behaviours, including deprivation of liberty and harmful use or interference with technology. However, some behaviours commonly associated with coercive control, including sustained social isolation, coercion relating to religious practice or persistent non-threatening communications, may currently only be captured where they satisfy the existing statutory definitions or are extremely overt in their application. A standalone coercive control offence stands to recognise some of these more nuanced forms of behaviours under the existing definition where there is a cumulative pattern of behaviours that may not have been captured as isolated incidents under the current definition.

⁴ Speakman, M. (2022). Crimes Legislation Amendment (Coercive Control) Bill 2022: Second reading speech. Parliamentary Debates (Hansard): Legislative Assembly, Parliament of New South Wales. Accessed at: <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/'HANSARD-1323879322-127845'>; Parliament of New South Wales. (2022). Statement of public interest: Crimes Legislation Amendment (Coercive Control) Bill 2022. Accessed at <https://dcj.nsw.gov.au/documents/children-and-families/family-domestic-and-sexual-violence/domestic-and-family-violence-/domestic-violence-discussion-paper-coercive-control.pdf>

Although there is a risk that the definition of family violence in the ACT may not fully or clearly capture the range of behaviours that can constitute a course of conduct of coercive control, this approach reflects an evolving understanding of coercive control and provides an appropriate foundation at this stage. There is merit in ensuring the definition is not an exhaustive list of behaviours, noting that individuals who use coercive control may adapt their behaviours to avoid criminalisation, while continuing to exert power through more subtle and evolving methods. As the Bill is currently drafted, the definition allows the offence to be implemented and refined over time as practice, evidence, and community understanding continue to develop.

While not specific to this Bill, ACT Policing notes an opportunity to strengthen the legislative framework relating to technology-facilitated abuse and similar forms of stalking behaviour. ACT Policing supports consideration of amendments to the *Crimes (Surveillance Devices) Act 2010* to prohibit the installation, use or maintenance of tracking devices without a person's consent and to better address emerging forms of digital stalking and coercive control.

ACT Policing would support consideration of provisions similar to those operating in Victoria, where it is an offence for a person to knowingly install, use or maintain a tracking device to determine another person's geographical location without their express or implied consent. Such reforms would complement the broader objectives of the Bill by addressing technology-enabled behaviours that may form part of a pattern of coercive and controlling conduct.

Course of conduct

ACT Policing supports framing the offence as a course of conduct, rather than a standalone incident, as this more accurately reflects the nature of coercive control and the lived experience of victim-survivors, while enabling a more holistic consideration of perpetrator behaviours and patterns. This approach seeks to address the limitation that criminal justice systems tend to focus on discrete incidents of assault, which may not fully capture the risk and harm from behaviour that is repeated, cumulative, or a combination of both, experienced in coercively controlling relationships⁵. ACT Policing considers this approach reflects the complex dynamics of coercive control and provides a practical and workable legislative basis for policing intervention.

Data from NSW indicates that coercive control incidents typically involve multiple behaviours, with an average of four distinct controlling behaviours identified per incident⁶. The most frequently recorded behaviours include harassment, monitoring or tracking (56 per cent), threats or intimidation (53 per cent), financial abuse (52 per cent), and shaming, degrading, or humiliating conduct (46 per cent). In addition, 59 per cent of coercive control incidents were accompanied by other offence types, most commonly intimidation or stalking (35 per cent), domestic assault (34 per cent), and malicious

⁵ Johnson, H, Eriksson, L, Mazerolle, P & Wortley, R. (2019). Intimate femicide: The role of coercive control. *Feminist Criminology*, 14(1), 3-23.

⁶ NSW Bureau of Crime Statistics and Research (2026). Coercive Control Monitoring Report December 2025. Accessed at: https://bocsar.nsw.gov.au/documents/topic-areas/domestic-violence/Coercive_control_monitoring_report_Dec_2025.pdf

damage (12 per cent), which demonstrates the overlap between coercive control and other forms of offending.

Many behaviours forming part of a pattern of coercive control are already captured by existing offences under ACT legislation. These include grievous bodily harm, threats to kill or inflict grievous bodily harm, acts endangering life, deprivation of liberty, stalking, and offences involving physical or sexual assault, which may continue to be pursued independently and may carry higher maximum penalties.

ACT Policing is aware that implementation will require comprehensive operational guidance for investigators and prosecutorial guidance to assist in navigating the complexity of charging decisions, evidentiary considerations and the interaction between a standalone coercive control offence and other criminal offending.

Nevertheless, as with other complex, pattern-based offences, such as child sexual offence matters, the investigation, charging, and prosecution of course of conduct offences are likely to require additional policing resources and specialised capability.

ACT Policing acknowledges that particularisation of offending can present evidentiary challenges for police, as well as for victims. The nature of this conduct can also make coercive control difficult for victim-survivors to describe with specific detail, especially where behaviour escalates gradually or is subtle, for example, progressively isolating the victim-survivor from family or social groups. Accordingly, the cumulative pattern of behaviour demonstrates the nature and seriousness of the offending rather than any individual act in isolation.

Fault element

The Bill proposes a range of criteria to be satisfied for the offence to be committed, the third being the person intends the course of conduct to coerce or control the family member (proposed new section 72J (1) (c)). ACT Policing supports the Government's proposed fault element requiring that a person intends the course of conduct. ACT Policing considers that an intent based fault element appropriately targets deliberate and sustained patterns of coercive and controlling behaviour, while reducing the risk of over criminalisation and misidentification, particularly given the proposed broader scope of relationships.

The intent-based fault element for the offence is consistent with coercive control offences in NSW, QLD, SA, as well as England and Wales. Differences in fault elements across jurisdictions may create confusion and undermine victim-survivors' ability to seek protection from domestic abuse in cross-border communities.

ACT Policing acknowledges that the application of recklessness as a fault element is an emerging area for evaluation across several jurisdictions, and of note ACT Policing recognises that NSW's *Crimes Legislation Amendment (Coercive Control) Act 2022* (NSW) requires statutory reviews of the coercive control offence. Three reviews are required, with the first to begin two years after the offence commences (that is, in July 2026). As part of this review in NSW, the Implementation and Evaluation Taskforce will be reviewing whether the threshold of intent is set too high and whether a standard based on recklessness may be more appropriate. The outcomes of these reviews may provide valuable evidence to inform future consideration of the ACT framework.

Reasonableness defence

ACT Policing supports the availability of a reasonableness defence, as it provides an important safeguard to ensure that the offence targets deliberate and abusive patterns of coercive or controlling behaviour, rather than conduct undertaken for legitimate purposes, such as protecting the welfare of a family member, caring responsibilities or other lawful decision making. This defence is mirrored in NSW, SA and QLD's coercive control legislation.

ACT Policing also supports the proposed approach requiring the defendant to bear the evidentiary burden in raising the defence. This approach appropriately balances the interests of the defendant with the practical reality that the circumstances giving rise to the defence are likely to be within the defendant's knowledge.

From an operational perspective, implementation will require clear guidance for investigators and prosecutors regarding the collection and assessment of evidence relevant to the reasonableness defence. Investigations may require police to obtain contextual evidence to assess whether the conduct was undertaken for a legitimate purpose or formed part of a pattern of coercive and controlling behaviour. This is likely to increase the complexity of investigations, particularly where nuanced and tailored behaviour is used to coerce or control a victim-survivor. While this burden rests with the defendant, ACT Policing notes investigators will still be required to consider the potential application of the defence as part of their overall evidentiary assessment when determining whether the threshold to charge has been met. In certain circumstances, this may also form the basis of why a charge is not progressed.

Penalty

ACT Policing supports the proposed maximum penalty of 700 penalty units, imprisonment for 7 years, or both, as set out in section 72J. This penalty appropriately reflects the seriousness of coercive control and aligns with comparable jurisdictions, including NSW and SA, while noting it is lower than QLD's maximum of 14 years imprisonment.

The proposed penalty also has important operational benefits, as it enables police to apply for a broader range of investigative tools. In most instances, a maximum penalty of 7 years imprisonment is required to meet the threshold for eligibility to access certain investigative capabilities, such as live interception over stored communications, which can be critical for evidentiary collection in complex coercive control matters. These investigative tools are not typically available under a lower maximum penalty, such as the previously considered range of 2 to 5 years.

Oversight and review

ACT Policing supports the establishment of governance and oversight mechanisms to enable ongoing monitoring and refinement of the legislation. A formal statutory review, conducted three years after commencement, is a necessary component to support the safe and effective implementation of the coercive control offence.

ACT Policing also supports a robust oversight framework through the establishment of a Coercive Control Advisory Committee, with ongoing monitoring and accountability functions to oversee the implementation of the offence. Robust data collection and sharing will be critical to support effective

monitoring and evaluation of the coercive control offence, including tracking perpetrator profiles, case outcomes, and system-wide trends. To support these functions, investment in systems capability, data collection processes and information-sharing arrangements will be required to ensure data can be captured, analysed and reported consistently across agencies.

An oversight mechanism should play a central role in coordinating data collection and reporting across the system, with the existing minimum age of criminal responsibility reform providing a useful guide for implementation.

Implementation

The Bill provides that the new offence will commence two years after the Act's notification day. ACT Policing supports this delayed commencement period, noting that implementation of a standalone coercive control offence will require significant preparation to ensure operational readiness. As outlined throughout this submission, implementation will necessitate system and process changes, workforce training, governance arrangements, information-sharing frameworks, operational guidance, and appropriate resourcing to support the investigation of complex, pattern-based offending. Broader community awareness and education will be required to support the understanding of coercive control, the scope of the new offence, and the expectations of the criminal justice process.

This timeframe aligns with commencement periods adopted in other jurisdictions, including NSW (18 months) and SA and QLD (two years), and provides police, the justice system and the broader community with sufficient time to prepare for the reforms.

Funding and additional cost pressures

In addition to governance and training impacts, the Bill is expected to drive increased police demand due to the new standalone offence, higher reporting prompted by community awareness campaigns and stakeholder engagement. The NSW Bureau of Crime Statistics and Research data for the first 18 months following the offence's commencement indicates 473 coercive control intimate partner incidents recorded by NSW Police and 22 charges laid⁷. This figure suggests an anticipated increase in volume in the ACT, noting the broader scope of family relationships under the legislation, despite a smaller population.

Early implementation data from NSW also indicates that coercive control offences may bring new victim-survivors into contact with the criminal justice system. NSW Bureau of Crime Statistics and Research data found that 53 per cent of coercive control victim-survivors had no prior history of DFSV victimisation recorded by NSW Police. This suggests that the offence may identify and engage a cohort of victim-survivors who have not previously reported violence or sought police assistance and may represent a first interaction with police and support services for many individuals. This

⁷ NSW Bureau of Crime Statistics and Research (2026). Coercive Control Monitoring Report December 2025. Accessed at: https://bocsar.nsw.gov.au/documents/topic-areas/domestic-violence/Coercive_control_monitoring_report_Dec_2025.pdf

reinforces the importance of ensuring police are appropriately trained to provide trauma-informed responses, make effective referrals to support services, and maintain victim confidence and trust throughout the investigative process. It also highlights the potential for increased demand on policing and support services arising from individuals who may not otherwise have come to the attention of the justice system.

Beyond the anticipated increase in volume, experience in other jurisdictions highlights the considerable time required to investigate coercive control matters. Data from NSW's early implementation of the offence indicates a median period of 188 days between the occurrence of an offence and the laying of a charge⁸. This reflects the complexity of coercive control investigations, which often require detailed evidence gathering, validation of allegations across multiple incidents, and the establishment of a broader pattern of behaviour over time.

While reported charge rates for the standalone coercive control offence provide a useful indicator of early implementation activity, they are unlikely to reflect the full extent of policing efforts associated with coercive control. In many matters, coercive and controlling behaviours may be identified and investigated as part of broader DFSV offending, with police proceeding with alternative charges, additional charges, or both. As such, the operational impact of the reform extends beyond matters ultimately charged as coercive control offences.

The introduction of the offence also represents a broader shift from an incident-based response to a pattern-based approach to DFSV investigations. This approach is likely to have workforce impacts across ACT Policing, including frontline General Duties members, specialist areas such as the Domestic and Family Violence Investigation Unit, and investigative support capabilities involved in evidence collection and analysis. These may include digital forensics, intelligence, financial investigation and other specialist capabilities that support the identification, assessment and prosecution of complex patterns of offending. The resource implications of the reform should therefore be considered more broadly than the number of coercive control charges laid.

To support implementation of the reform, ACT Policing will require new investment and ongoing budget support. As outlined throughout this submission, the introduction of a standalone coercive control offence will necessitate system and process changes, workforce training, governance and oversight arrangements, investigative capability uplift, and strengthened referral pathways. ACT Policing will continue to work closely with the ACT Government through future budget and policy processes to ensure the necessary resourcing is available to support the safe and effective implementation of the offence.

Governance implications

The proposed legislation has governance implications for ACT Policing, requiring substantial arrangements. This includes the establishment of new oversight structures, such as a Coercive Control Advisory Committee, which would provide implementation oversight, including policing

⁸ NSW Bureau of Crime Statistics and Research (2026). Coercive Control Monitoring Report December 2025. Accessed at: https://bocsar.nsw.gov.au/documents/topic-areas/domestic-violence/Coercive_control_monitoring_report_Dec_2025.pdf

impacts, and commence prior to the offence to support operational readiness. A statutory review conducted three years after commencement will also assess how the offence operates in practice, including policing responses.

ACT Policing will be required to participate in cross-agency and whole-of-system governance arrangements, including ongoing implementation planning and monitoring frameworks. Internally, ACT Policing will need to strengthen governance through updates to operational policies and procedures, enhanced evidence-capture guidelines to support pattern-based offending, and revised risk assessment frameworks.

Particularly through the early stages of implementing the offence, investigations are also likely to require enhanced supervisory and governance oversight to ensure the offence is applied consistently. These factors demonstrate that implementation extends beyond training and legislative commencement and requires sufficient time to build the systems, capability and oversight mechanisms necessary to support effective and safe application of the offence.

Training implications

ACT Policing will require a whole-of-workforce capability uplift before the legislation's commencement, with a lead time of up to two years to ensure workforce readiness. Targeted and ongoing specialist training is required to equip officers to recognise patterns of coercive control and the tactics of those who use violence.

ACT Policing is currently undertaking a range of measures to uplift capability in responding to DFSV including coercive control. Police receive DFSV training through recruit training, courses delivered by the DFVIU, and regular training days.

Supported by funding from the ACT Government, ACT Policing co-designed the development of the Enhanced Domestic and Family Violence Program (EDFVP), which was delivered across the workforce in 2025-2026. The training focuses on key operational capability areas identified through inquiries and reviews, including:

- demonstrating core knowledge of DFSV and coercive control;
- understanding how DFSV is experienced across diverse communities;
- engaging with victim-survivors using trauma-informed and victim-centred practice;
- identifying, assessing and managing DFSV risk;
- identifying and responding to perpetrators of DFSV, avoiding collusive practice.

The program is mandatory for all sworn members, from frontline officers to senior leadership, to ensure a consistent baseline capability across the organisation. Training is also being extended to relevant professional staff where appropriate.

Additional training will be required following implementation of the Bill, covering evidentiary requirements for coercive control as a course-of-conduct offence, trauma-informed responses, and risks of misidentification, particularly for vulnerable groups. Operational training will also be required to ensure members are able to identify appropriate support services, make effective referrals, and understand escalation and review processes associated with complex coercive control investigations.

Broader system uplift

In responding to incidents of coercive control, it is critical that police and support services provide both victim-survivors and respondents with access to information and support to enable informed decision-making. ACT Policing supports additional resourcing for support services to reduce harm, particularly for victim-survivors and marginalised communities.

It is important that legislation is accompanied by investment in services to support individuals whose matters are reported to police but do not meet the threshold for charge or investigation, ensuring a holistic response. Given the complexity and scale of DFSV, sustained government investment in support services is required to enable a coordinated, whole-of-system response.

ACT Policing also notes that officers offer all parties referral to support services, such as the Domestic Violence Crisis Service, when attending DFSV incidents. In addition, victim-survivors are provided with information, including contact details for Legal Aid and other relevant support services.

As already outlined at length, evidence collection in coercive control matters is a lengthy and complex process. The evidentiary burden is significant, with many cases relying heavily on victim-survivor testimony, which can be retraumatising and place considerable emotional strain on those involved. Combined with the extended duration required to build a pattern-based case, this may contribute to victim-survivor disengagement over time. Noting the risk of attrition among victim-survivors as they progress through the judicial process, ACT Policing will seek to work with implementation partners to identify measures that support victim engagement, improve access to support services, and maintain confidence in the justice system throughout lengthy and complex coercive control investigations.

Two mechanisms may assist in reducing victim-survivor attrition. First, community awareness campaigns can help set realistic expectations about the investigative and judicial process. Second, technological tools such as the *Empower You* app may support evidence collection. Developed by NSW Police, the app enables victim-survivors of DFSV to discreetly record and store evidence, including photos, screenshots, and details of incidents with date, time and location, as well as diary entries. This material is securely stored and can assist in building evidence for prosecution. Through implementation, the ACT Government should consider partnerships and collaborative arrangements that enable the adoption or leveraging of existing technology solutions.