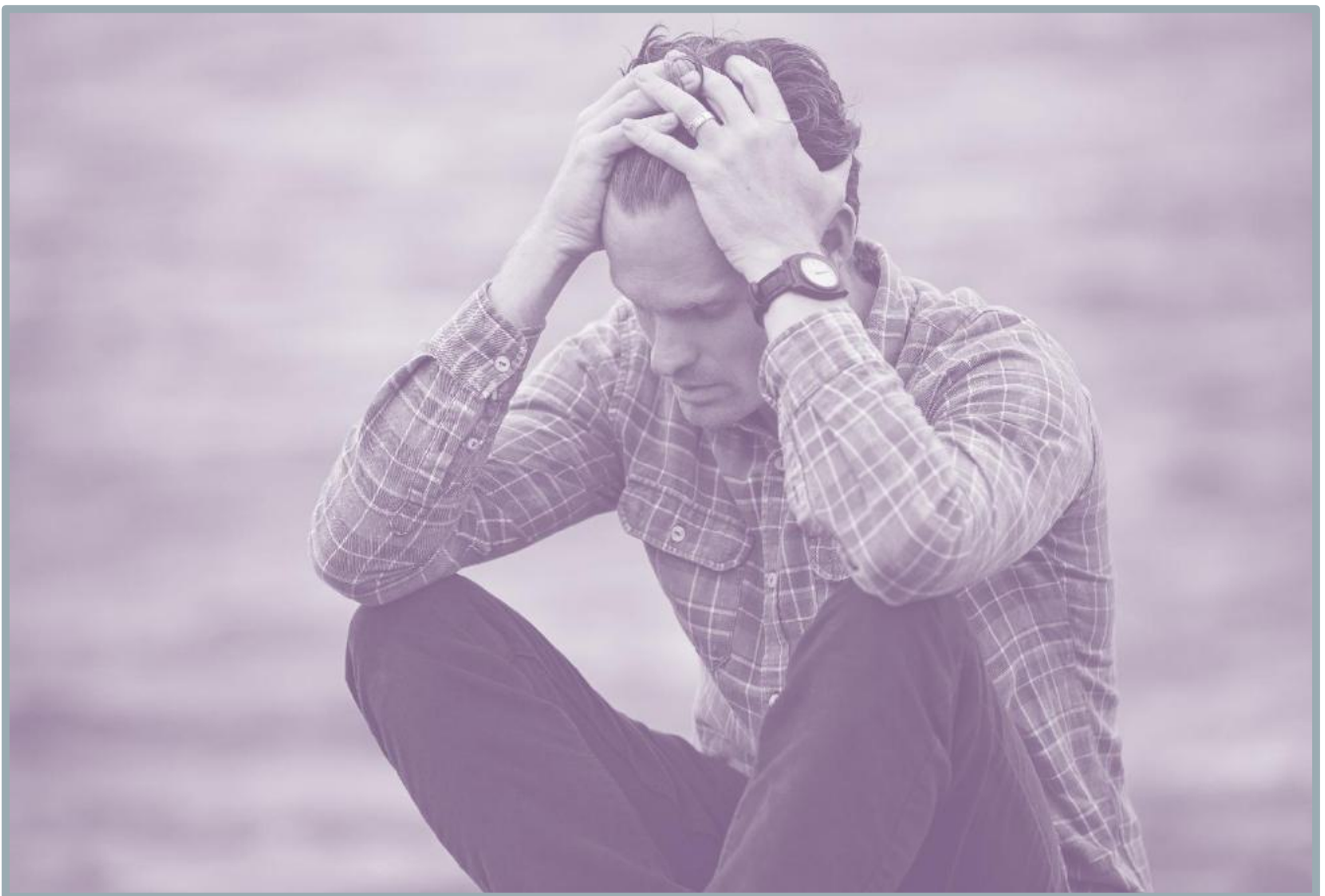


Submission to the South Australian Government:

*Criminal Law Consolidation (Coercive Control)
Amendment Bill 2023*



Acknowledgment of Country

No to Violence acknowledges First Nations Peoples across these lands; the Traditional Custodians of the lands and waters. We pay respect to all Elders, past, present, and emerging. We acknowledge a deep connection with country which has existed over 60,000 years. We acknowledge that sovereignty was never ceded, and this was and always will be First Nation's land.



Contact NTV:

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Men's Referral Service – for men concerned about their behaviour

1300 766 491

About No to Violence

No to Violence (NTV) is Australia's largest national peak body representing organisations and individuals working with men to end family violence. We are guided by the values of accountability, gender equity, leadership, and change.

NTV provides support and advocacy for the work of specialist men's family violence interventions carried out by organisations and individuals. The work undertaken by specialist men's family violence services is diverse and includes but is not limited to Men's Behaviour Change Programs (MBCP), case management, individual counselling, policy development and advocacy, research and evaluation, training, workforce development and capability building.

NTV also provides a range of training for the specialist men's family violence workforce including a Graduate Certificate in partnership with Swinburne University, as well as professional development for workforces who come into contact, directly and indirectly, with men using family violence. NTV is a leading national voice and plays a central role in the development of evidence, policy, and advocacy to support the work of specialist men's family violence nationally.

About Our Members

NTV represents over 160 members Australia-wide. Our membership structure is inclusive of individuals and organisations ranging from specialist services to individuals and others who have an interest in preventing and responding to men's family violence.

Our approach to policy analysis and advocacy

No to Violence is the largest peak body in Australia representing the men's family violence sector. This a sector with a rich and innovative history in Australia, spanning more than 30 years. Our members are practitioners working directly with men who use violence, many of whom are also victim-survivors. The men's family violence sector works across prevention, early intervention, response and recovery and healing. As the peak body, we work on behalf of our members to spotlight their innovative and practice-based knowledge and insights, identify knowledge gaps and the data and frameworks needed to address them, and advocate to shift the burden for men's violence away from women and children towards the men using violence.

In relationship to this Bill, we represent the South Australian stakeholders who have shared their knowledge and experience with us through the development of this present submission and our previous submissions, as well as our advocacy in other federal and state jurisdictions. We wish to acknowledge the invaluable contributions of stakeholders who have contributed to this body of work.

In line with our role as the national peak body for the men's family violence sector, our approach to assessing the proposed Amendment Bill is to start by asking who bears the brunt of existing policy and how we might design policy that shifts this burden away from the most marginalised members of our community towards those perpetrators who need to remain in view of the system to ensure the safety and dignity of victim-survivors. We make use of practice-based innovations and the relevant evidence base to support our assessments and offer useful feedback to government.

List of recommendations

1. No to Violence recommends that the South Australian government develop a comprehensive implementation plan attached to sufficient resourcing. The implementation plan should include:
 - A review of systemic approaches to risk assessment and information sharing across police, child protection, and the broader domestic, family and sexual violence sector.
 - A review of police practices related to responses to domestic and family violence, including handling of complaints and review of training content and requirements.
 - A training plan for police, judiciary and interconnected services, e.g. alcohol and other drugs, housing, and mental health services.
 - A review of the availability of appropriate men’s family violence services, including perpetrator interventions.
 - Commitment to securing sufficient resourcing to implement system reforms.
2. The Bill and explanatory notes or guidance should acknowledge that coercive control is the underlying tactic of domestic and family violence.
3. The Bill should make explicit reference to the controlling impact of “fear for physical and psychological safety”.
4. The Bill should be revised to avoid the potential minimisation of the seriousness of emotional and psychological impacts.
 - Examples of behaviours that have a controlling impact should be listed under part 2 of the interpretation i.e. before the aspects of a person’s life that may be impacted. This should occur in part 3.
 - The Bill should omit references to examples of direct and indirect restrictions on a person’s basic freedoms so as to avoid inadvertently creating a hierarchy between behaviours and impacts.
5. Apply an intersectional lens to the draft Bill and recognise the gendered drivers of domestic and family violence.
6. The Bill should be accompanied by explanatory notes or guidance that supports police and judiciary to understand the gendered drivers of domestic and family violence and the impact of structural discrimination as they relate to this new offence.
7. Amend the Bill to cover domestic and family violence rather than restricting the scope only to current or former intimate partners.
8. Consider what protections can be implemented alongside the introduction of a coercive control offence to recognise and respond to systems abuse.
9. Conduct a review of existing systemic reform levers and data collection mechanisms as part of a considered implementation plan.

- Identify areas for improvement, including but not limited to improved access to information sharing and appropriate sources of data.

10. Include a legislative monitoring, evaluation and review mechanism that aims to support police and judicial understanding for effective implementation of the Bill, with an independent review of the legislation after three years to ensure its use, efficacy, and impact, including:

- the overcriminalisation of marginalised groups by reviewing ongoing reforms of police culture, practice, and procedures;
- the barriers to reporting or any under-reporting coercive control, and the communities experiencing these barriers of reporting or under-reporting;
- complaints on treatment or conduct by police and courts responses in the context of coercive control offences, and the likely communities that report complaints or are impacted;
- assess incidences of recidivism to ascertain the impact of rehabilitation programmes including funding of men's behaviour change programs;
- evaluate policing and court response to new legislation, as well as the training undertaken by frontline workers, police, and prosecutors and frontline service response to new legislation, including changes in demand for services.

Background

Coercive control is understood as the underpinning dynamic of domestic violence, where the exertion of power and dominance manifests through the use of patterns of abusive behaviours that create fear and deny liberty and autonomy to victims.¹ Anyone can be a victim of coercive control. However, because domestic and family violence is gendered, women are most likely to experience abuse perpetrated by men. The impact of intersecting structural discrimination means that the most marginalised women in our communities are more likely to be targeted by perpetrators of domestic and family violence.

The opportunity to recognise the core experience of domestic and family violence in South Australia in law is historic. However, criminalisation is only one tool in a suite of available policy and legislative options to address coercive control.² It is crucial that victim-survivors are not further harmed through the process of recognising their experiences in law. This means paying attention to the systems and structures that keep victim-survivors dispossessed and marginalised, including the criminal justice system, child protection and family law.

Extensive debate has occurred in the lead-up to successive jurisdictions introducing coercive control offences. The crux of this debate brought to the forefront the damaging impact of policing practices that mis-identify victim-survivors as the perpetrator of domestic and family violence, a judicial system that fails to recognise the gendered and colonial drivers of domestic and family violence, and adjacent services and government systems that trap these victim-survivors in a cycle of criminalisation.

South Australia has its own history of missed opportunities to support victim-survivor safety and dignity and institute meaningful systemic reform. Examples within recent coronial inquests where domestic violence was a factor have spotlighted significant systemic failings yet delivered no recommendations that may have led to system reforms.

The table below presents the most recent coronial inquests where domestic violence (involving the underlying tactics of coercive control) **were** factors in the deaths of victims and perpetrators. In each case, **findings of systemic failings** were uncovered yet no relevant **specific** recommendations were made.³ A close reading of these reports suggests that there is a need to review and refine systemic approaches to risk assessment; information sharing across police, child protection, and the broader domestic, family and sexual violence sector; police responses to domestic and family violence; and the availability of appropriate men's family violence services, including perpetrator interventions. As the presence of coercive control is a significant predictive factor of domestic and family violence fatalities, it is crucial that all systemic approaches to assessing and responding to risk remain in view during the implementation of a coercive control offence.

¹ See National Principle 1, [National Principles to Address Coercive Control in Family and Domestic Violence](#).

² See Victorian Aboriginal Legal Service (2022) [policy paper](#).

³ Juanita McNamara-Cutler died by suicide while in custody following experiences of domestic violence. As her experiences of DFV were not taken into account by the coroner, we have not included her death in the above table. We note however that suicides in the context of domestic and family violence are increasingly being recognised as domestic and family violence fatalities.

| Case | Outcome |
|--|---|
| <p>Inquest into the death of Serina May Amos, report completed 2018</p> <p>Circumstances of death: DFV fatality</p> | <p>The coroner noted that communication between police across jurisdictions was a factor in Ms Amos' death.</p> <p>The coroner made no recommendations in this case.</p> |
| <p>Inquest into the death of Phillip Harris, report completed 2019</p> <p>Circumstances of death: DFV related incarceration and death in custody</p> | <p>The coroner's report does not indicate that Mr Harris was due to receive any support or intervention to address his history of domestic violence offences.</p> <p>The coroner acknowledged that the issue of access to razors requires closer consideration within the prison system and that there will be a review of the relevant standard operating procedure.</p> <p>The coroner did not make any recommendations in this case.</p> |
| <p>Inquest into the death of Paul Scott Roberts, report completed 2020</p> <p>Circumstances of death: Suicide in the context of use of DFV</p> | <p>The coroner suggested that police attendance should have been classified high risk. The SAPOL Communications Centre initiated its own review following Roberts' death.</p> <p>No comments were made by the coroner related to Mr Roberts' engagement with community corrections staff or participation in perpetrator interventions.</p> <p>No recommendations were made by the coroner.</p> |
| <p>Inquest into the deaths of Graziella Dailer and Dion Wayne Muir, report completed 2020</p> <p>Circumstances of deaths: DFV fatality and suicide in the context of use of DFV</p> | <p>The coroner suggested that SAPOL actively monitor the policing of domestic violence and ensure compliance with SAPOL expectations.</p> <p>No recommendations were made in this case.</p> |
| <p>Inquest into the deaths of Amber Rose Rigney and Korey Lee Mitchell, report completed 2022</p> <p>Circumstances of deaths: DFV fatalities</p> | <p>Ms Adeline Rigney's death was not considered within this report. This meant that the intersection between her experiences of domestic and family violence and child protection involvement (as a child and a parent) did not form part of deliberations.</p> <p>Measures to improve responding to and managing family safety risk through information sharing between family courts and agencies and organisations were not included in recommendations due to the recent introduction of new child protection legislation and a relevant Royal Commission. No recommendations relevant to domestic violence were made in this case.</p> |

No to Violence has recommended a **comprehensive implementation plan attached to sufficient resourcing** in each of our previous submissions to the South Australian government regarding coercive control. Our previous recommendations spotlighted the gaps in resourcing for victim-survivors services, need for ongoing reform of police practices, knowledge gaps for police, judiciary and the service sectors working in conjunction with domestic and family violence services. No to Violence has also highlighted that there is insufficient investment in men's family violence services including to secure a foundation of family safety contact work. We reiterate here that a considered and comprehensive implementation plan is essential to support the roll out of any legislation to criminalise coercive control in South Australia.

1. No to Violence recommends that the South Australian government develop a comprehensive implementation plan attached to sufficient resourcing. The implementation plan should include:
 - A review of systemic approaches to risk assessment and information sharing across police, child protection, and the broader domestic, family and sexual violence sector.
 - A review of police practices related to responses to domestic and family violence, including handling of complaints and review of training content and requirements.
 - A training plan for police, judiciary and interconnected services, e.g. alcohol and other drugs, housing, and mental health services.
 - A review of the availability of appropriate men's family violence services, including perpetrator interventions.
 - Commitment to securing sufficient resourcing to implement system reforms.

Main concerns with the Coercive Control Amendment Bill (2023)

Recognising coercive control in the law is an acknowledgement that the systematic stripping away of a person's sense of self and self-worth is a predictor of domestic and family violence fatalities.⁴ It is a historic shift away from a focus on hierarchies of abusive behaviours where only some forms of abuse were considered serious. The previous approach put intense focus on victim-survivors and placed the onus squarely on them – asking why didn't she leave. Extensive work has since been done to improve the evidence base on domestic and family violence and better incorporate lived experience expertise. It is essential that this new coercive control offence makes use of this understanding.

The South Australian Attorney General, the Hon. Kym Maher, has signed up to the National Principles for Addressing Coercive Control on behalf of South Australia. These national principles are the result of significant consultation across Australia, balancing a need to recognise the core experience of domestic and family violence to shift societal and structural responses to DFV with concerns about adverse impacts for communities who are disproportionately policed and

⁴ See the Parliament of New South Wales' [Joint Select Committee on Coercive Control report](#) (2021).

incarcerated and face structural barriers to accessing support. The principles set out key aspects of what constitutes coercive control and how it should be addressed.

As signatories to these principles and the National Plan to End Violence against Women and Children (2022-2032), South Australia should align its efforts to address domestic and family violence to nationally agreed upon plans and principles. Consistency across jurisdictions is essential to avoid a levelling down effect, send a consistent message about what constitutes coercive control, and to support efforts across the prevention, early intervention, response, and recovery and healing domains.

There are specific instances in the Bill that **do not align with** the intent of the National Principles and therefore have potential to detract from national efforts to end violence against women and children in a generation. This submission discusses specific issues with the Bill and the Principles they conflict with.

No to Violence's main concerns with the amendment Bill are stated below:

- Coercive control is not recognised as the underpinning tactic of domestic and family violence.
- The Bill has the potential to inadvertently set up hierarchies between forms of controlling impacts.
- The Bill does not recognise coercive control as a fundamentally gendered issue that is influenced by intersecting structural discrimination.
- The Bill does not recognise victim-survivors of family violence.
- Further consideration is needed to realise the educative potential of the amendment.

In light of these concerns, **No to Violence strongly encourages the South Australian government to review and redraft the Bill; develop a considered implementation plan, inclusive of a review into how existing mechanisms are or are not working; and to build in an independent monitoring and evaluation mechanism into the Bill.**

Our concerns with the Bill as it stands are explored in detail in the following sections.

Coercive control is not recognised as the underpinning tactic of domestic and family violence

Victim-survivors must be able to see their experiences reflected in the legislation in order for it to be effective. National Principles 1, 4, 6 and 7 outline the importance of coercive control being recognised as the underpinning tactic of domestic and family violence. Principle 1 sets out that a shared understanding of the common features of coercive control is essential for guiding effective work towards addressing, preventing, and responding to domestic and family violence.

Accurately translating how coercive control is used by perpetrators and experienced by victim-survivors into law is crucial for guiding accurate judgements and decision-making. Principle 7 specifically denotes the importance of embedding the National Principles in legal responses in order to realise the benefits of criminalising coercive control. Further, Principles 4, 6 and 7 outline how the lack of a shared understanding of coercive control at present undermines efforts to improve societal understanding and victim-survivor safety. The lack of shared understanding means that coercive control is not consistently recognised and responded to, and this facilitates barriers and discrimination for victim-survivors in many aspects of their lives.⁵

The omission in the Bill of coercive control as the underpinning tactic of domestic and family violence is most obvious through the absence of the role of fear for a person's physical and psychological safety in controlling victim-survivors.

To mitigate these concerns, No to Violence makes the following recommendations:

2. The Bill and explanatory notes or guidance should acknowledge that coercive control is the underlying tactic of domestic and family violence.
3. The Bill should make explicit reference to the controlling impact of “fear for physical and psychological safety”.

The Bill has the potential to inadvertently set up hierarchies between forms of controlling impacts

This Bill recognises that there is a controlling impact and that this impact denies liberty and autonomy but misses the core role of fear in achieving a controlling impact. The omission of fear can have the unintended consequence of positioning coercive control as incident based, rather than recognising the pattern of abusive behaviours that constitute coercive control. The National Principles consistently emphasise the role of fear in Principles 1, 2 and 4.

The omission of fear from the description of what constitutes a controlling impact has potential to create fundamental misunderstandings of what constitutes a “serious course of conduct” – part of the ‘reasonable person test’ necessary for determining guilt for the coercive control offence. Fear is acknowledged in the Bill as part of determining a person's intention to have a controlling impact on

⁵ South Australia has recently recognised that victim-survivors of domestic, family and sexual violence experience discrimination in the workplace and are working to address this barrier to economic participation.

the other person. However, fear is not embedded in the behaviours or restrictions on a person described in the Bill.

The omission of fear limits the direct and indirect controlling impacts described in the Bill. The examples provided in sections 2, 3 and 4 do not cover the range of impacts that are widely recognised, including within the National Principles. It is recognised elsewhere that impacts of coercive control can be physical, emotional, psychological, spiritual, cultural, social and financial.⁶ The Bill covers freedom of movement, freedom of action, engagement in social, political, religious, cultural and economic activities, bodily autonomy, and access to basic necessities, support services, and property. However, the omission of emotional and psychological impacts means it would be difficult to establish these indirect impacts.

National Principles 2 and 4 highlight that the seriousness of emotional and psychological impacts often go unrecognised, meaning that subtle and contextualised abuse is minimised. The omission of emotional and psychological impacts, such as the impact of fear, can affect the successful conviction rates and inadvertently create a hierarchy between forms of abuse – rather than recognising the wide ranging and cumulative impacts of coercive control.

To mitigate these concerns, No to Violence makes the following recommendations:

4. The Bill should be revised to avoid the potential minimisation of the seriousness of emotional and psychological impacts.
 - Examples of behaviours that have a controlling impact should be listed under part 2 of the interpretation i.e. before the aspects of a person's life that may be impacted. This should occur in part 3.
 - The Bill should omit references to examples of direct and indirect restrictions on a person's basic freedoms so as to avoid inadvertently creating a hierarchy between behaviours and impacts.

The Bill does not recognise coercive control as a fundamentally gendered issue that is influenced by intersecting structural discrimination

National Principles 1, 2, 3 and 4 each discuss the importance of considering the impact of coercive control through an intersectional lens. A recognition of how gendered drivers intersect with other forms of structural discrimination is important for accurately describing victim-survivors' experience of coercive control and to interrupt instances when perpetrators target marginalised peoples and exploit structural discrimination as part of a pattern of abuse.

The intersectionality of domestic and family violence means that close attention must be paid to how coercive control laws work for and against communities who have been historically

⁶ Our previous submissions to the South Australian government regarding coercive control also emphasised these wide ranging impacts.

disproportionately policed and criminalised. This includes Aboriginal and Torres Strait Islander peoples, LGBTQI+ people, people living in poverty, and migrant and refugee communities.

The focus on a controlling impact that restricts particular freedoms within this Bill centres a civil libertarian individualistic approach to a fundamentally gendered form of violence. This language does not capture the essence of what constitutes coercive control as it omits the influence of structural discrimination and inequalities, including gender – the primary driver of domestic and family violence.⁷

The impacts of coercive control are most likely to be cumulative, rather than incident-based, as coercive control is an underlying tactic rather than a single and specific form of abuse. The mistaken assumption that coercive control is incident-based is identified within National Principle 4 as a factor in the misidentification of the predominant aggressor – an issue that disproportionately impacts marginalised communities.

To mitigate these concerns, *No to Violence* makes the following recommendations:

5. Apply an intersectional lens to the draft Bill and recognise the gendered drivers of domestic and family violence.
6. The Bill should be accompanied by explanatory notes or guidance that supports police and judiciary to understand the gendered drivers of domestic and family violence and the impact of structural discrimination as they relate to this new offence.

The Bill does not recognise victim-survivors of family violence

This Bill applies a criminal coercive control offence to a select profile of victim-survivors. Limited recognition of these impacts in the law has potential to drive further misunderstandings in responses to coercive control, including a misallocation of funding. Considering that structural inequalities have a compounding impact and the effects of coercive control are cumulative, it is essential that accurate understandings of coercive control are embedded in legislation.

A focus on intimate partner relationships (current and former) does not cover the scope of family violence, honing in only on the experience of the intimate partner who is most often a mother. This approach fails to recognise kinship systems, extended family networks or children's experiences as victims of domestic and family violence in their own right. Narrowing the scope of the offences to those between family members does not adequately mitigate the risk of over-criminalisation and/or misidentification of offenders, as this problem also exists within the family violence context.

Importantly, a limited scope omits some of the most marginalised victim-survivors – including children who are victims of domestic and family violence in their own right, older adults experiencing elder abuse, as well as abuse that takes place within broader kinship systems, extended families and chosen family networks. National Principles 1, 2 and 5 emphasise the importance of

⁷ See Our Watch (2021) resource: [Change the Story](#) - the national framework to guide the primary prevention of violence against women.

recognising the impact of coercive control on victim-survivors who experience abuse outside of an intimate partner relationship.

This omission also does not adequately guard against systems abuse – where perpetrators exploit structural discrimination and manipulate systems and processes, such as within child protection, family law and social security, to control the victim-survivor/s. These are issues of concern raised in National Principles 1 and 3.

Significant systemic failings across police, child protection, social security, and service systems have been implicated in coronial inquests into domestic and family violence deaths in South Australia and elsewhere.⁸ Consideration must be given to how this Bill will be interpreted across these systems and what processes, training or other supports will be implemented to promote a greater understanding of how systems abuse exploits and entrenches structural discrimination.

To mitigate these concerns, No to Violence makes the following recommendations:

7. Amend the Bill to cover domestic and family violence rather than restricting the scope only to current or former intimate partners.
8. Consider what protections can be implemented alongside the introduction of a coercive control offence to recognise and respond to systems abuse.

Further consideration is needed to realise the educative potential of the amendment

The misalignment between the Amendment Bill (2023) and the shared understanding of coercive control embedded in the National Principles is particularly concerning due to the prevalence of attitudes towards gendered violence within the broader Australian community.

The results from the most recent National Community Attitudes Survey highlight that almost half of all Australians do not believe that violence against women is a problem in their suburb or town (47%) and that men and women equally perpetrate domestic violence (41%). A quarter of all respondents (25%) believed that women who do not leave their abusive partner are partly responsible for the abuse continuing and 37% agreed that women make false claims of domestic violence to gain an advantage in custody battles.⁹

These community misunderstandings towards gendered violence are also present within the police and the judiciary and pose a significant barrier for victim-survivors of domestic, family and sexual violence within the criminal justice system.¹⁰ National Principle 4 specifically outlines that the

⁸ See for example [recent coverage](#) of ongoing coronial inquests in the Northern Territory.

⁹ See [ANROWS' \(2023\) report](#) on the findings from the 2021 National Community Attitudes towards Violence against Women Survey.

¹⁰ No to Violence recently participated in a Senate Inquiry into sexual consent laws where the impact of community attitudes on legal responses was reiterated by experts from across the domestic, family and sexual violence sector. A [report outlining key arguments and findings](#) is available.

positive impact of service and responses systems, including criminal justice responses, is limited due to misunderstandings about coercive control.

As has been outlined in this submission, misunderstandings about the nature of coercive control, who experiences it and how it is perpetrated have the potential to disproportionately harm the most marginalised members of the community. This includes by restricting access to support services, misidentifying and criminalising victim-survivors, and is a factor in the deaths of victims and perpetrators in some cases.

National Principle 7 sets out key concerns about the efficacy of legal responses to coercive control, including those explained within this submission, and urges governments to consider comprehensive implementation and change management strategies to mitigate unintended negative consequences of criminalising coercive control. In light of the major concerns with the Bill as it stands and in lieu of an implementation plan, No to Violence has concerns that the potential to shift attitudes and understanding on gendered violence among the police, judiciary and broader community will remain limited.

No to Violence strongly encourages the South Australian government to review and redraft the Bill; develop a considered implementation plan, inclusive of a review into how existing mechanisms are or are not working; and to build in an independent monitoring and evaluation mechanism into the Bill.^{11 12}

No to Violence has recommended elsewhere that **a review mechanism consider pressing issues such as:**

- the overcriminalisation of marginalised groups including by reviewing ongoing reforms of police culture, practice, and procedures;
- the barriers to reporting or any under-reporting coercive control, and the communities experiencing these barriers of reporting or under-reporting;
- complaints on treatment or conduct by police and courts responses in the context of coercive control offences, and the likely communities that report complaints or are impacted;
- assess incidences of recidivism to ascertain the impact of rehabilitation programmes including funding of men's behaviour change programs;

¹¹ See New South Wales' Crimes Legislation Amendment (Coercive Control) Act 2022 for an example of legislation that included a review process. A 'Coercive Control Implementation and Evaluation Taskforce' was also included in this legislation to support the review process.

¹² Existing mechanisms for review might include police complaints, coronial inquests, and recommendations from parliamentary inquiries and other government reports. The rich existing sources of evidence and data should be examined to identify areas for improvement, including greater information sharing and access to appropriate data to inform responses to domestic, family and sexual violence across the prevention, early intervention, response, and recovery and healing domains.

- evaluate policing and court response to new legislation, as well as the training undertaken by frontline workers, police, and prosecutors and frontline service response to new legislation, including changes in demand for services.

Recommendations

9. Conduct a review of existing systemic reform levers and data collection mechanisms as part of a considered implementation plan.
 - Identify areas for improvement, including but not limited to improved access to information sharing and appropriate sources of data.
10. Include a legislative monitoring, evaluation and review mechanism that aims to support police and judicial understanding for effective implementation of the Bill, with an independent review of the legislation after three years to ensure its use, efficacy, and impact, including:
 - the overcriminalisation of marginalised groups by reviewing ongoing reforms of police culture, practice, and procedures;
 - the barriers to reporting or any under-reporting coercive control, and the communities experiencing these barriers of reporting or under-reporting;
 - complaints on treatment or conduct by police and courts responses in the context of coercive control offences, and the likely communities that report complaints or are impacted;
 - assess incidences of recidivism to ascertain the impact of rehabilitation programmes including funding of men's behaviour change programs;
 - evaluate policing and court response to new legislation, as well as the training undertaken by frontline workers, police, and prosecutors and frontline service response to new legislation, including changes in demand for services.