

Introduction

Founded in 2001, the Asylum Seeker Resource Centre (ASRC) is Australia's largest independent aid and advocacy organisation for people seeking asylum and refugees, supporting and empowering people at the most critical junctures of their journey. Our services include legal, casework, housing, medical, education, employment and emergency relief. Based on what we witness through our service delivery, we advocate for change with refugees to ensure their human rights are upheld.

The ASRC's Human Rights Law Program provides specialised legal representation and advice, including through its Gender Clinic, to people seeking asylum whose refugee claims are based on a fear of gender-based violence including family violence (often experienced in Australia as well as in their country of birth), sexual exploitation, abuse or trafficking, or fear of persecution due to their sexual orientation or gender identity. The ASRC's Gender Clinic was established in 2015 and is the only clinic of its kind in Australia. The specialisation of the Gender Clinic within the ASRC's legal program provides particular insight into the complex intersectional challenges in accessing legal, social and economic protection from family violence in Australia faced by people seeking asylum and refugees.

The ASRC welcomes the opportunity from the Standing Committee on Social Policy and Legal Affairs to provide a submission regarding how to provide better access for victim-survivors in the family law system to Family Violence Orders (FVO) and the effective enforcement of those orders.

These submissions address the following Terms of Reference:

- The current barriers for litigants in the family law system to obtain and enforce FVOs; and
- How FVOs could be more accessible for victims of violence going through the family law system.

In considering how to ensure better access for victim-survivors to FVOs and the efficient enforcement of such orders, reforms to the migration system must be implemented to remove the barriers to access FVOs caused and exacerbated by the migration system. **There remains a concerning gap between how the Australian Government approaches family violence against women with insecure visa status, as opposed to the general population. Until this is resolved, refugee women and children will continue to face disproportionate harm.**

Fundamentally, until meaningful legal reform occurs, key barriers for reporting of family violence will remain in place. Women and children with insecure visa status face inaccessibility, a lack of information, and the threat of forced permanent family separation. It is critical, once protections are in place, that appropriate information, support and legal assistance is provided.

Reform must also be undertaken with particular emphasis on co-design, and the contributions of people in affected communities and with lived experience.

Recommendations

Reform the legal framework to ensure access to secure visa status for victim-survivors of family violence

Recommendation 1: Ensure pathways to security for victim-survivors of violence across all appropriate visa categories, extending existing limited provisions.

Recommendation 2: Initiate meaningful legal reform of migration and refugee law to ensure the safety, security and empowerment of victim-survivors (so their visas in Australia are not consequently cancelled upon reporting family violence under section 140 of the *Migration Act 1958* (Cth) (**the Act**)).

Recommendation 3: Replace Ministerial Direction 110 to ensure visa cancellation and refusal practices do not undermine attempts to combat family violence and disempower and harm victim-survivors and their families.

Recommendation 4: Provide visa protection and pathways for victim-survivors in situations where necessary, including for victim-survivors to have access to visa pathways to remain in Australia if the perpetrator is subject to character cancellation and deportation as a result of family violence (e.g. humanitarian visa place or a workplace protection type visa).

Recommendation 5: Ensure barriers to visa security, including discriminatory processes that impact victim-survivors disproportionately (such as the practice of not interviewing claimants, or the presumption against claims raised late), are reformed.

Recommendation 6: Provide free comprehensive legal assistance to all victim-survivors of family violence, including migration advice, prior to their engagement with the family law system (i.e. prior to making a formal report to the police).

Recommendation 7: Fund and expand specialist LGBTIQ+ legal services.

Recommendation 8: Provide regular Community Legal Education regarding the family law system and its intersection with the migration system in key languages such as Vietnamese, Malay, Tamil and Arabic.

Recommendation 9: Provide free accredited interpreters for victim-survivors to access legal services and ensure that information is translated into key community languages.

Ensure accessibility of reporting and appropriate support

Recommendation 11: Place Culturally and Linguistically Diverse (CALD) community liaison officers in all police stations and courts.

Recommendation 12: Expand the [Court Network](#) service to specialise in assisting victim-survivors of family violence to navigate the family law system.

Recommendation 13: Provide cultural awareness training for all agencies involved in service delivery, particularly police, to avoid mis-identification of victim-survivors.

Recommendation 14: Provide free ongoing mental health support for victim-survivors from refugee and asylum seeking backgrounds who are engaged in the family law system in regards to their experiences of family violence in Australia.

Recommendation 15: Mandate the use of accredited interpreting services at the reporting stage.

Recommendation 16: Fund childcare to enable victim-survivors to engage in all stages of the family law system.

Recommendation 17: Provide a mental health support worker to be present in all trials and court proceedings. This must include support workers who are appropriately trained on working with CALD communities.

Recommendation 18: Legal services should be co-located with other support services (such as health or social services) or part of multi-disciplinary centres incorporating specialist legal services.

Recommendation 19: Ensure that all victim-survivors can access support services, Medicare, work rights, financial assistance (e.g. Status Resolution Support Services payments) and accommodation regardless of their visa status.

Intersectionality of barriers facing refugees and people seeking asylum

Despite the high rates of family violence experienced by people of culturally and linguistically diverse backgrounds, often there is no specific mention of refugees or people seeking asylum as a sub-cohort at a heightened risk of family violence. In a survey of 1,392 migrant and refugee women across Australia conducted by Harmony Alliance and Monash University in 2020, one in three of the respondents, or 33%, had experienced family violence.¹ In line with the observations of the HRLP, 'temporary visa holders consistently reported proportionately higher levels of Family Violence'.² Only a handful of surveys in the world have exclusively considered or focused on migrant and refugee communities' experiences of family violence, victimisation, perceptions of policing and trust in communities and institutions. The Harmony Alliance 2020 survey was also the first national survey to 'capture migration related controlling behaviours'.³

The failure of the Australian Government and those involved with the justice and family law system to specifically consider refugees and people seeking asylum overlooks the intersectionality of the barriers to protection and justice facing this cohort (in particular those with insecure visa status), including those from LGBTQIA+ communities, and people from rural, regional and remote locations.

Refugees and people seeking asylum have often experienced harm perpetrated by authorities in their home country. This fosters a sense of distrust and lack of faith in the police or the justice system, thereby discouraging them from engaging with the police or courts.

The migration system does not inspire confidence as perpetrators of family/gender-based violence use the lack of protections for victim-survivors as a tool to silence them with the threat of visa cancellation or deportation, bringing with it threats to safety and family integrity.

These barriers are further compounded when the victim-survivor is from LGBTIQ+ communities and is a person seeking asylum. There are very few organisations or legal centres that specialise in assisting LGBTIQ+ communities and mainstream organisations often lack the specialised knowledge and skills to understand the nuances and intersection of issues faced by LGBTIQ+ communities.

Moreover, the justice system in Australia has historically operated to the exclusion and detriment of LGBTIQ+ communities. It was only in 1981 that decriminalisation of sex between men came into effect in Victoria and it was only in 2020 that the '*gay panic*' defence to murder was abolished Australia-wide. This context makes it even more difficult for individuals at the intersection of queer identity and insecure visa status to engage with police and the justice system in regards to their experiences of sexual violence.

As outlined in St Kilda Legal and Thorne Harbour Health's joint paper '*LGBTIQ Legal Needs Analysis - Reflections on legal need and future planning from our two-year pilot program*':

LGBTIQ people have complex and unique legal needs, which are compounded by barriers to accessing justice to address their legal needs. LGBTIQ communities disproportionately experience discrimination, harassment, violence and social exclusion as a result of the gender binary, homophobia, transphobia, biphobia, intersex discrimination, cissexism and heterosexism. This contributes to risk factors that increase disadvantage, including experiencing mental illness and homelessness.

LGBTIQ communities face barriers to accessing legal services to address legal need, including a deep mistrust of the justice system, lack of community specific or appropriate services and lack of information about available services. Many people in LGBTIQ communities have

¹ Harmony Alliance report p.9.

² Ibid.

³ Ibid.

overlapping and intersecting identities that increase their level of legal need. Many LGBTIQ people are also members of other communities, including Aboriginal and Torres Strait Islander communities, multicultural and multifaith communities, people in prison, regional/remote, neurologically diverse, people with lived experience of disability and/or mental illness, sex workers, senior or young, rainbow families and people living with HIV—all of which cumulatively impact experiences of discrimination, systemic inequity and legal problems...

The complex legal needs of LGBTIQ communities are best met by a responsive, informed and specialist integrated service that understands how identities and status influence, interact and compound experiences with the legal system. The legal sector should prioritise meaningful co-design and partnerships, listening, understanding and flexibility, to better address legal need in LGBTIQ communities. An effective response requires collaboration between legal services, non-legal services, peer-led community groups, education and law and policy reform to advance LGBTIQ rights within a fairer system.

Any consideration of reform to the family law system should also consider the overlap with the migration system and corollary reforms that will need to be made in the migration context.

Improving access to FVOs

Barriers created by migration law and policy

Although the scope of this consultation is limited to FVOs, it would be remiss not to highlight that many of the barriers facing victim-survivors of family violence, who are refugees and people seeking asylum, are a direct consequence of migration law and policy. There is a fundamental lack of coherence in federal government policy which seeks to provide better protection, especially to women and children, from family violence, while conversely creating migration law systems which make victim-survivors of family violence

Case study: Perpetrator's violence results in consequential cancellation of dependent victims' visas

Anvi² is a national of India. She travelled to Australia as a dependent on her husband's visa with their three children. A few months after arriving in Australia, their daughter began a relationship with a boy at school. Anvi's husband discovered this while he was overseas on a business trip. He sent text messages to Anvi threatening to kill her and the children. He also threatened to have them sent back to their home country. When he returned home, he assaulted the daughter and Anvi for not maintaining proper discipline over their children. Anvi's husband was charged with domestic violence offences against his wife and daughter.

*As a result of these charges, the Department of Home Affairs (**the Department**) cancelled his visa under section 116 of the Act on the basis that he posed a risk to individuals in the Australian community. As his wife and children were dependents on his visa, their visas were automatically cancelled by law under section 140 of the Act. The Department has contacted Anvi and her children to advise them of their migration options, however currently can only grant them Bridging E Visas while they await the outcome of any subsequent visa application.*

Eligibility for any further visas is uncertain, complex and subject to significant delays. Anvi and her family face significant insecurity and hardship while trying to establish a future in Australia.

more vulnerable to such abuse due to their visa status. Such incoherence cannot be addressed unless overarching national goals to effectively tackle family violence are prioritised above conflicting migration-related goals.

It is well established that the risk of serious violence increases when victim-survivors attempt to report violence or leave situations of family violence.⁴ A potential consequence of current migration law and policy is that victim-survivors may face increased violence if they attempt to make a report to the police or the Department, as the perpetrator will be aware of the potential negative implications for their visa status. Also, the fear of family separation against their will and visa implications for the victim-survivor and their loved ones may prevent them from reporting incidents to the police.

Case study: Impact of family breakdown caused by family violence on victims' visa status

Mya is a Burmese woman married to Kyl, a stateless Rohingya man. They fled Myanmar and arrived in Australia by sea and are seeking asylum. Kyl started verbally abusing and controlling Mya, not letting her see her friends, forcing her to have sex with him and only allowing her to work from home.

Mya approached our office seeking advice about the implications for her protection application and her future visa status if she seeks an intervention order or separates from her husband. Mya is ethnic Burmese and has significantly weaker claims for protection than her Rohingya husband. Under current law, her protection visa application is more likely to be refused if she separates from her husband as she will no longer be considered a dependent on his application, and will not be granted a visa when he is granted a visa. Instead, she would need to put forward her own claims and be able to establish that she is owed protection in her own right. There would be a higher chance that Mya and her children's visa applications will be refused, and that the process will be subject to delays.

If Mya stays with Kyl and seeks an intervention order requiring him to cease his violence towards her, or if he were to breach this order, this could trigger a process where the Department may seek to cancel her husband's visa on character grounds due to him having breached the intervention order or committed offences of family violence against her. If his visa is cancelled, her visa, and her children's visas will also be cancelled even though she has been the victim of these crimes.

Mya decides that she will stay in the violent relationship and not seek an intervention order in order not to jeopardise her visa status in Australia.

Highlighted below are some aspects of Australia's current migration laws and policies, which create insurmountable barriers and disincentives for victim-survivors on temporary visas to seek FVOs:

- The narrow scope and application of the existing family violence provisions of the Act which renders them inaccessible by the majority of victim-survivors on temporary visas experiencing family violence;

⁴ Victorian Government, 'Evidence-based risk factors and the MARAM risk assessment tools', <<https://www.vic.gov.au/maram-practice-guidesfoundation-knowledge-guide/evidence-based-risk-factors-and-maram-risk>>.

- Consequential visa cancellation under section 140 of the Act which results in a victim-survivor's visa being cancelled due to family and sexual violence perpetrated by the primary visa holder;
- A lack of protection against the risk of weaponisation of visa status and misidentification as a tool of violence against victim-survivors;
- Broad powers to cancel or refuse visa applications on the basis of having engaged with family violence without centering the voices of victim-survivors and even when there are strong countervailing circumstances, evidenced in Direction 110. Currently, there is a heavy-handed and paternalistic approach to cancellation that does not centre the victim-survivor's view and may leave them without support. This has resulted in victim-survivors being less likely to report violence; and
- Department processes regarding protection visa applications are not trauma-informed and often place victim-survivors at risk of harm from perpetrators, in particular:
 - The use of written section 56 requests in cases of family and gender-based violence protection claims, often depriving victim-survivors of an opportunity for interview and exposing them to years of additional insecurity;
 - The widespread practice of skepticism with respect to family violence claims; and
 - Legislative presumptions against acceptance of claims raised later in the visa application process, a common issue for trauma and violence victim-survivors

Case study: Impact on victim-survivor and her family due to reporting family violence

Shanthi called law enforcement after an altercation with her partner and did not receive migration advice about the potential consequences. Her partner's visa was cancelled and he was taken into immigration detention. They were separated for more than 3 years while he was detained at various locations including Christmas Island, causing them and their families immense and lasting harm and distress and depriving them of his financial and other support.

Shanthi had to pause her studies and work because of the deterioration in her mental health. Her attempts to be heard as part of the process were unsuccessful, with decision-makers discounting her experience and prescribing her best interests.

Although they have been able to rebuild their life together, Shanthi states the impact on her of the experience is irreversible and that, had she known the consequences, she would not have reported the matter.

The ability for any reforms to increase access to and enhance enforcement of FVOs will be undermined and hindered if corollary reforms outlined in the recommendations above are not made to the migration system. These reforms will remove barriers and disincentives for victim-survivors to engage with the family law and justice system in order to seek protection from family violence.

Lack of specialised and comprehensive legal representation

Many victim-survivors of family and sexual violence, who are people seeking asylum or refugees, struggle to access specialist migration legal assistance. Migration advice is essential to ensure victim-survivors are aware of the migration implications of their decision to engage in the family law and justice system on themselves and their loved ones, particularly where the perpetrator of the family violence is a family member or spouse (e.g. consequential visa cancellation, deportation from Australia). A person is entitled

to understand their options and the consequences that may arise, particularly given the significance of the harm that may ensue and particularly where systemic issues are likely to reduce their agency in the future.

People struggle to access migration legal advice for a range of reasons. Often their partners control and monitor their movements, making it difficult for victim-survivors to attend appointments without putting themselves at risk. Partners may also control family income, limiting victim-survivors to free legal services, which are in short supply due to drastic cuts to government funding for legal services for people seeking asylum. Also, a legal service may be unable to assist a victim-survivor after separation due to a conflict of interest if they have previously represented the family, which further limits the services available to victim-survivors. These barriers apply equally to accessing legal advice and assistance in regards to the family law system.

Legal representation is also crucial to prevent victim-survivors from being misidentified as perpetrators in the context of family and sexual violence. A recently released report by inTouch Multicultural Centre Against Family Violence (**inTouch**) noted that a third of their clients, who are migrant and refugee women, have experienced misidentification at some point during their engagement with law enforcement and the justice system, noting that migrant and refugee women are more vulnerable to misidentification.⁵ InTouch highlights the prevalence of 'systems abuse' which is a form of coercive control in which perpetrators use the police and justice system to further abuse the victim-survivor often resulting in misidentification.⁶ Addressing the issue of misidentification is essential for ensuring better access to FVOs and the efficient and appropriate enforcement of the orders.

In this context, **access to comprehensive legal advice, including migration advice, is essential for people seeking asylum and refugees to safely engage with the FVO process and be empowered to make decisions that are in their best interests. This will allow for better access to FVOs in the family law system.**

Legal services that are co-located with other support services (such as health or social services) or multi-disciplinary centres incorporating specialist legal services would be suitable models to address the needs of people seeking asylum and refugees. Health-justice partnerships create safe spaces for victim-survivors to access information about the justice system while minimising the risk that the perpetrator will become aware of the engagement. Also, reducing the number of organisations/legal services that a person seeking asylum must engage with will reduce re-traumatisation by limiting the number of people to whom they must retell their experiences. Ideally, the same service that provides advice regarding their engagement with the family law system can also represent them with their protection visa application.

Although there has been an increase in the number of migration agents and lawyers placed in Women's Legal Centres across Australia over the last few years, this has not led to an improvement in access for refugees and people seeking asylum in regards to FVOs. A number of clients assisted by the ASRC have ongoing family violence matters and in the process of attempting to obtain FVOs. The ASRC struggles to find services to provide free advice to our clients regarding the FVO process. Aside from a duty lawyer service at the Courts, that are largely only accessible on the day of FVO hearings, there is very limited advice or assistance available for people going through this process. Most Community Legal Centres will not provide any ongoing representation in relation to FVOs and very few are able to provide advice appointments to explain the FVO process. Without access to free, reliable, easily accessible information in various languages, victim-survivors are unable to engage with the FVO process. **Community legal education regarding FVO processes and funding for advice and ongoing representation are pivotal in increasing victim-survivors access to FVOs.**

⁵ InTouch Multicultural Centre Against Family Violence, 'Position Paper – The causes and consequences of misidentification on women from migrant and refugee communities experiencing family violence' (February 2022), p. 1.

⁶ Ibid, 3.

In addition, ensuring that legal services are provided in a culturally sensitive manner is critical. This will involve measures such as access to lawyers of the same gender as the victim-survivor, providing access to interpreters, and cultural awareness training for all agencies regarding the sensitivities of family violence in different ethnic communities.

It is important that reforms are applied in rural and regional areas as well urban locations given the difficulties that people in remote locations face in accessing legal services. Also, in-person and online services are both required to enhance accessibility, noting that any online services must be translated into key community languages to ensure access to people seeking asylum and refugees. Northern Community Legal Centre (**NCLC**) in partnership with the Australian Muslim Women's Centre for Human Rights (**AMWCHR**) recently published a report reviewing the process issues and barriers and faced by migrant and refugee women when applying to the courts for the FVIO in-person and via online forms⁷. The report notes that:

Migrant and refugee women face significant challenges when independently engaging with the online application and pre-court information forms, as they are only available in English, are excessively long, and use complicated language and legal terms. When women seek support from police or courts, they are often being turned away and re-directed back to the online forms. Consequently, migrant and refugee women are experiencing delays in obtaining legal protections or disengaging from the processes entirely⁸.

The findings of this report echo the experiences of ASRC clients when engaging with the FVO process. Most clients that we work with who are also engaged with the family law system are unaware of the pre-court information form or are unable to read the form as it is only available in English. The ASRC has struggled to find any service that is able to assist clients with understanding and completing this form. It is clear from the report and from our clients' experiences that they are unable to access the FVO system without free, specialised support. It is also evident that even if victim-survivors are able to overcome the various barriers outlined in this submission, the FVO system needs to be overhauled with refugee and migrant communities in mind in order to ensure accessibility and usability. The ASRC therefore supports the recommendations proposed by AMWCHR and NCLC in the abovementioned report.

Lack of access to non-legal support

People seeking asylum are already amongst the most financially insecure and most socially excluded in our community due to their ineligibility for Centrelink and government cuts to the meagre Status Resolution Support Services (SRSS) payments available to limited numbers of people seeking asylum, resulting in many vulnerable families being denied access SRSS payments. Within this subset, victim-survivors of family violence experience increased vulnerability because their access to critical entitlements, such as work rights, Medicare or SRSS, depend on three factors: the type of bridging visa held by a person seeking asylum; the conditions attached to their bridging visa (e.g. a person is not eligible for Medicare if they do not have the right to work); and often the stage they are at in the refugee status determination process. People's needs based on their experiences of family violence are not taken into account in determining the conditions on their bridging visas.

Concerningly, many people seeking asylum who are victim-survivors of family violence are ineligible for any form of income or housing support and may not even have access to Medicare or emergency accommodation in women's refuges and shelters due to their visa status. As of 31 March 2023, the average

⁷ Tambasco, C., Hammond, K., Smith, J., Bottrill, N., McKenna, T., Burdon-Smith, L., & Fahmy, M. (2024). Barriers to Access: Migrant and refugee women's experiences of the online family violence intervention order process. Melbourne: Northern Community Legal Centre and the Australian Muslim Women's Centre for Human Rights < chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://e82a5a1f-55c4-47bc-8b1d-4a401b8f9c31.usrfiles.com/ugd/e82a5a_e13d78a2dbcf4e5da2e25fe11c7a3c80.pdf >.

⁸ Ibid

time for the Department to process a Protection visa was 793 days.⁹ During this time, victim-survivors of family violence must cope with years of living on temporary bridging visas (or sometimes no bridging visa at all) with limited access to basic supports and no certainty about their future.

The housing challenges faced by migrant and refugee communities is compounded by visa insecurity, which results in limited access to crisis or ongoing accommodation, and consequently women, children and queer communities experience homelessness. Women's safe houses and refuges can only provide accommodation for limited periods and after that, more sustainable accommodation arrangements must be made and usually paid for by the victim-survivor. Safe housing options for queer communities are even more limited particularly for transgender individuals. As many people seeking asylum have no eligibility for government support, no work rights and no other source of income, they have no capacity to pay rent and cannot be readily transitioned out of emergency/short term housing into more durable housing. Due to the difficulties in accessing refuge-type accommodation and their lack of income, many women and people from queer communities in this situation end up experiencing homelessness, sometimes also with their children.

In this context, victim-survivors of family violence without income are often forced to cohabit with a violent partner, placing both the victim-survivor and their children at high risk of continuing violence. In addition, insecure housing places people at greater risk of family violence and prevents them from engaging with the justice system. A lack of support or safe housing can also result in breaches of intervention orders creating new legal problems for both parties, especially if the family end up remaining together in their migration process and the perpetrator is also a person seeking asylum, resulting in possible cancellation on character grounds of any eventual visas they may secure. Breaches of intervention orders due to destitution and lack of support for victim-survivors impacts individuals and clearly undermines the application of the rule of law as well as the public purpose and utility of intervention orders.

Case study: Lack of support results in continued cohabitation with perpetrator and breaches of orders

Leila experienced violence by her husband before they came to Australia. She travelled to Australia in 2013 after her husband abducted their two children to Australia and hid her passport. She reunited with her husband in Australia and they lodged a joint protection visa application, but as a result of family violence the relationship broke down. The joint protection visa application was refused, and Leila and her former husband lodged separate review applications at the Administrative Appeals Tribunal.

A 2015 family law order granted Leila with primary responsibility for her children. In 2019, Leila moved back in with her former husband because she could not afford to support herself and her children. She and her former husband live together in breach of the family law order.

As soon as Leila moved in with her ex-husband, she informed the Department and Centrelink of her change in residential address, as she is obligated to do under the Migration Act. She informed Centrelink that she had not reconciled with her ex-husband, but was only living under the same roof as him out of necessity in order to meet her living expenses. As a result, Leila's SRSS payments were cut off because she was deemed to be part of her former husband's family unit and supported by his salary. Now Leila cannot afford to look for new independent accommodation, and has a bag packed ready if she needs to flee the home with her children again. Because Leila was previously receiving SRSS payments, she also does not have work rights on her bridging E visa.

⁹ Refugee Council of Australia, Statistics on people seeking asylum in the community, 17 March 2023, <https://www.refugeecouncil.org.au/asylum-community/5/>.

A victim-survivor's ability to report family violence and engage with the family law system is undermined by the inadequate and insufficient support and service provisions available. **It is essential that all victim-survivors can access support services, Medicare, work rights, financial assistance (e.g. Status Resolution Support Services payments) and accommodation regardless of their visa status.** This in turn will enhance access to justice when applied in conjunction with the other recommendations proposed in these submissions.

Conclusion

The inadequacies of the migration system in its treatment and lack of protection for victim-survivors of family violence highlight that reforms to the FVO system cannot happen in isolation. In order for refugee and migrant communities to access FVOs, it is essential that corollary reforms are made to the migration system, geared toward safety, dignity and empowerment. Additionally, it is pivotal that the FVO process be redesigned with migrant and refugee experiences in mind and that police and enforcement agencies receive adequate training to respectfully and efficiently engage with migrant and refugee communities. Without these reforms, the FVO system will remain inaccessible and the enforcement of such orders will remain ineffective and, in some cases, harmful. The ASRC welcomes any further opportunities to speak to the issues outlined in these submissions.