

Response to Discussion Paper:
Continuing Professional Development for
Legal Practitioners on Coercive Control

21 July 2023

Acknowledgement

We acknowledge the domestic and family violence victim-survivors with whom we work and whose voices and experiences inform our advocacy in the hope for positive change.

WLSA members operate from many different locations across Australia. Across these locations, we acknowledge the Traditional Owners of Country, recognise their continuing connection to land, water and community, and pay respect to Elders past and present.

Who we are

Women's Legal Services Australia (WLSA) is the national peak body for 13 specialist Women's Legal Services in each State and Territory across Australia, specifically designed to improve women's lives through gender-led and trauma-informed specialist legal representation, support, and advocacy.

WLSA members include:

- Women's Legal Service Victoria
- Women's Legal Service Tasmania
- Women's Legal Service NSW
- Women's Legal Service WA
- Women's Legal Service SA
- Women's Legal Service Queensland
- North Queensland Women's Legal Service
- First Nations Women's Legal Service Queensland
- Women's Legal Centre ACT
- Wirringa Baiya Aboriginal Women's Legal Centre (NSW)
- Top End Women's Legal Service
- Central Australian Women's Legal Service
- Katherine Women's Information and Legal Service

What we do

Women's Legal Services provide high quality free legal services, including representation and law reform activities, to support women's safety, access to rights and entitlements, and gender equality. We seek to promote a legal system that is safe, supportive, non-discriminatory, and responsive to the needs of women. Some of our services have operated for over 40 years.

The principal areas of law that our services assist with are family law, family violence, child protection, and victims of crime compensation. Some of our members also assist with migration law, employment law and discrimination law, criminal law, and other areas of civil law. Our services also deliver training programs and educational workshops to share our expertise regarding effective legal responses to violence and relationship breakdown.

Most of the clients assisted by Women's Legal Services have experienced, or are still experiencing, family and domestic violence. Our services have specialist expertise in safety and risk management, maintaining a holistic and trauma-informed legal practice, providing women additional multidisciplinary supports, including social workers, financial counsellors, and trauma counsellors, for long-term safety outcomes.

Contact us

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Table of Contents

| | |
|---|----|
| Contributing to the design of the grant opportunity | 4 |
| Audience for professional development on coercive control | 5 |
| Development of a competency framework | 5 |
| Development of an industry plan | 6 |
| Core training content for inclusion in the training package | 7 |
| Training package design to include tailoring of training content | 8 |
| Model for delivering training | 9 |
| Expertise required to develop and deliver competency-based family violence training | 10 |
| Project management model | 11 |
| Evaluation | 11 |
| Gaining Continuing Professional Development (CPD) points | 11 |

Contributing to the design of the grant opportunity

Women's Legal Services Australia (WLSA) commends the Attorney-General's Department for providing stakeholders with the opportunity to contribute to the design of the grant opportunity to train legal practitioners on coercive control nationally.

The *Continuing Professional Development for Legal Practitioners on Coercive Control* initiative is an important step towards consistency across the legal profession in understanding and responding to the nature and dynamics of domestic and family violence.¹ With victim-survivors of domestic and family violence being ten times more likely than others to experience legal problems, it is crucial that lawyers and barristers have the required knowledge and skills to identify and respond to family violence.²

In building capability across Australia's legal workforce, the initiative rightly recognises the contribution of legal practitioners to the safety of victim-survivors, to holding perpetrators accountable, and to achieving the *National Plan to End Violence against Women and Children 2022-2032* (National Plan) goal of "...holistic, coordinated and integrated person-centred responses".³ The National Plan recognises the need for "ongoing specialist education, training and professional development to staff in specialist sectors", for a comprehensive and coordinated national response to exist.⁴ This initiative is an important investment that will contribute to a sustainable and coordinated national response to training legal practitioners in identifying and responding to domestic and family violence.

However, we are concerned that the funding amount provided will not be sufficient to realise the full policy intent of the National Plan. This is particularly concerning given the significant rates of domestic and family violence across Australia, the high number of lawyers providing legal assistance to people at risk of, or experiencing, domestic and family violence, and the significant resources required to comply with best practice principles for professional development.

Women's Legal Services specialise in the provision of legal assistance to women experiencing or escaping domestic, family, and sexual violence, alongside access to in-house social workers and financial counsellors to address a range of legal and non-legal needs. Our services provide legal assistance across multiple areas of law, including family violence, family law, child protection, and victims of crime compensation, and we address the complex intersections between multiple legal issues that often co-exist for the women who are our clients.

Women's Legal Services play a significant role in building legal workforce capability to respond to gendered violence, including domestic, family, and sexual violence. This includes building capacity across the legal workforce to identify when clients are experiencing domestic, family, or sexual violence. We draw upon the best available evidence and practice expertise to design competency-based training for legal practitioners that is tailored to their area of legal practice, setting and needs. Women's Legal Services also deliver community legal education and training for non-legal professionals, such as social workers and financial counsellors. In addition, state and territory governments regularly seek the advice of Women's Legal Services on designing and implementing training for frontline workers, including health services and police. It is our experience developing and delivering training that we draw upon in our contribution to the consultation.

¹ The National Principles to Address Coercive Control relate to coercive control in the context of domestic and family violence, with broad application not limited only to intimate-partner violence. Coercive control is the underpinning dynamic of domestic and family violence. This is acknowledged by numerous authorities, government and academic sources. The Victorian Government notes in the *Ending Family Violence: Victoria's Plan for Change* (Plan for Change) that "Family violence occurs when a perpetrator exercises power and control over another person. It involves coercive and abusive behaviours by the perpetrator that are designed to intimidate, humiliate, undermine and isolate; resulting in fear and insecurity." This submission refers to coercive and control, as well as domestic and family violence, interchangeably.

² Christine Coumarelos, *Quantifying the Legal and Broader Life Impacts of Domestic and Family Violence* (No 32, Law and Justice Foundation of NSW, June 2019) 1.

³ Commonwealth of Australia (Department of Social Services), *The National Plan to End Violence against Women and Children 2022-2032* (2022) 18.

⁴ Commonwealth of Australia (Department of Social Services), *The National Plan to End Violence against Women and Children 2022-2032* (2022) 84.

This submission outlines the key components of a comprehensive and coordinated legal workforce capacity building project that could be funded by the Attorney-General's Department, in addition to the training on coercive control that is the subject of this consultation.

Audience for professional development on coercive control

The Law Council of Australia has recommended that mandatory domestic and family violence education should be provided to all legal practitioners, as part of their continuing professional development requirements.⁵

A foundational understanding of the nature and dynamics of gendered violence, including domestic, family, and sexual violence is important for all legal practitioners. All lawyers, regardless of whether domestic or family violence is a client's presenting issue, should have the skills and knowledge to identify family or domestic violence and respond appropriately to clients' needs. Where lawyers do not have the skills or confidence to identify domestic or family violence, the legal assistance provided may be impacted, potentially leading to worse legal and safety outcomes. Conversely, where lawyers can identify domestic and family violence (whether as the presenting issue, or the cause or context for the presenting legal issue), legal practitioners are able to intervene earlier to provide properly informed legal assistance, as well as minimising the escalation of violence and/or legal problems.

The Attorney General's Department has identified the need to provide training to all legal practitioners, with a particular focus on legal practitioners who work in the areas of law that commonly work with clients who are experiencing family violence.⁶ This supports the proposition, with which WLSA agrees, that there are core competencies that all legal practitioners should hold, irrespective of the area of law in which they practice or the demographic of the clients they work with. WLSA also has expertise in the areas of law that women who are experiencing domestic and family violence are most likely to engage with.

Development of a competency framework

A competency framework sets out the level of expertise and knowledge needed for a lawyer's area of legal practice, role, and practical experience. It is a foundational document for the development of a focused training offering that will create practice change across the workforce.

It is recommended that a framework is developed to inform the design of the training package. WLSA recognises the limitations of the funding envelope. Given this, the development of a competency framework and an industry plan (discussed further below) could be completed as the primary output for the training package, along with additional investment for the delivery of training, or the Attorney General's Department may wish to consider investing in this work in the first instance to further inform the grant opportunity.

The National Principles to Address Coercive Control (the National Principles) provide the current nationally agreed understanding of coercive control, and the framework should be informed by the National Principles and relevant best practice frameworks:

- The National Principles rightly provide flexibility for national, state and territory bodies to tailor approaches to preventing and responding to coercive control. A competency framework must also remain flexible to allow for tailoring, while creating greater consistency in competencies held by legal practitioners across Australia. This should include different tiers to acknowledge the different skills and knowledge required depending on the area of law practiced and demographic of clients.
- The competency framework should draw upon pre-existing frameworks that exist in different jurisdictions in relation to family violence. For example, the *Victorian Government's Responding to Family Violence Capability Framework* provides insight into competencies that are particularly relevant for legal practitioners practicing within Victoria.⁷ By developing the competency framework

⁵ Law Council of Australia, Submission to the Council of Attorneys-General Family Violence Working Group, *Options for improving the family violence competency of legal practitioners: consultation paper* (30 September 2019) 8.

⁶ Attorney General's Department, *Continuing Professional Development for Legal Practitioners on Coercive Control Discussion Paper* (2023) 1.

⁷

with reference to these pre-existing frameworks, greater consistency across different sectors and jurisdictions can be created. This will result in increased safety for victim-survivors of domestic and family violence, as professionals in the health, justice and social sectors work collaboratively to reach better outcomes.

Women's Legal Services have developed and delivered competency-based training to lawyers (predominately community lawyers) across Australia. In our experience, taking a competency-based approach ensures training developed and delivered contributes to sector wide change.

In our experience, collaboration with key stakeholders in the development of a competency framework ensures that training is led by and supported by the sector. Industry bodies and subject matter experts, including those with lived experience of domestic and family violence, must contribute to the development of a competency framework to ensure it contributes towards skills and knowledge acquisition that serves the community.

A competency framework would support the legal sector by:

- Providing common language to be used by legal practitioners,
- Creating clarity around the knowledge and skills required by legal practitioners to identify and respond to domestic and family violence,
- Clearly defining the expectations of legal practitioners working in collaboration with other systems responses to domestic and family violence,
- Providing a tool to determine professional development needs of individual legal practitioners as well as supporting career development planning,
- Ensuring the training requirements for legal practitioners are current and reflect best practice by mandating regular reviews of the framework and ongoing reflection, and
- Creating greater recognition of the expertise held by specialist domestic and family violence legal practitioners, particularly Women's Legal Services.

A competency framework would also support the domestic and family violence sector by:

- Establishing shared understanding of key concepts and practices across sectors,
- Creating clarity around how the legal sector collaborates with the health and social sector to contribute to greater safety for individuals, families, and communities,
- Contributing to a multidisciplinary response to domestic and family violence, and
- Promoting clarity around competencies to be held across disciplines as well as areas of specialisation.

Establishing a competency framework is an effective way to ensure that practice change is guided by and supported to meet the outcomes of the National Plan. While the focus of this training package is on supporting *Continuing Professional Development for Legal Practitioners on Coercive Control*, a competency framework can also be utilised to support training initiatives offered to legal practitioners during their university studies, practical legal training and beyond, as a part of an industry plan.

Development of an industry plan

An industry plan would establish how competencies will be achieved over time, including the professional development of legal practitioners operating in different states and territories, and in different areas of law. This requires a robust understanding of the current knowledge and skills held by legal practitioners across different areas of law and within different states and territories. It also requires priorities to be set regarding which legal practitioners will be the focus of training, initially and in the future.

The Attorney General's Department are prioritising the provision of training to legal practitioners who

practice in areas of law that frequently involve family violence as a key concern for the client.⁸ Women's Legal Services support this preliminary prioritisation; however, an industry plan would provide a clear plan for all legal practitioners' competency to be assessed and developed over time. This includes consideration of training opportunities that are currently offered or should be offered during university or Practical Legal Training. A further benefit of an industry plan is that it can assist with articulation of how this and future investments in professional development are working towards the vision and intended outcomes of the National Plan.⁹

The competency framework, in conjunction with the industry plan, would determine what content must be delivered, to which priority group. Core training content can then be developed that addresses key competencies and then a process of tailoring to roles and jurisdictions can occur.

Core training content for inclusion in the training package

Understanding coercive control in the context of broader systems responses to domestic and family violence

As coercive control is the underpinning dynamic of gendered violence, including domestic, family, and sexual violence, the training package design should include a focus on knowledge and skills to identify and respond to domestic and family violence in its different presentations. Training must shift lawyers understanding of domestic and family violence as isolated incidents (commonly focused on physical violence), and towards understanding the need to recognise, assess for and respond to the coercive and controlling dynamic that underpins domestic abuse and can occur over an extended period of time.

This is especially important as there is a concerning trend towards distinguishing coercive control as the non-physical forms of family violence. Coercion and control are the intention or outcome of physical and sexual violence, just as they are the intention or outcome of non-physical forms of family violence. Incorrectly distinguishing coercive control as a stand-alone tactic or type of family violence can inadvertently create a hierarchy of domestic and family violence behaviours.

To ensure the training package contributes to the overarching outcomes of the National Plan and embeds the National Principles into legal practitioners practice, legal practitioners must develop their understanding of coercive control in the context of broader systems responses to domestic and family violence.

Foundational and advanced competencies

The training package design should demonstrate how the package will meet the training needs of the audience. We recommend the grant require the design of training package for both foundational training and advanced training.

Foundational training

Foundational training should support legal practitioners in gaining foundational competencies in identifying and responding to gendered violence, including domestic, family, and sexual violence. This includes working with clients who are using violence or experiencing violence. The training content required to develop legal practitioners' foundational competencies includes:

- Knowledge about gender inequality, discrimination and disadvantage,
- The nature and dynamics of gendered violence (including power structures that enable gendered violence),
- How to demonstrate sensitivity to gender issues,
- Evidence-based risk factors for clients experiencing domestic, family, and sexual violence,
- Impact of domestic, family, and sexual violence on individuals, families, and the legal system,
- How domestic, family, and sexual violence is experienced by different cohorts and communities and

⁸ Attorney General's Department, *Continuing Professional Development for Legal Practitioners on Coercive Control Discussion Paper* (2023) 1.

⁹ National Plan Outcomes Framework is not yet available.

the particular barriers they face to disclosing domestic, family, and sexual violence,

- Introduction to domestic, family, and sexual violence systems response, including barriers to disclosing violence,
- The legal definition of domestic and family violence in relevant jurisdiction/s,
- Questions to ask clients to identify domestic, family, and sexual violence (when client is the victim-survivor or perpetrator),
- How to respond when a client discloses that they have experienced or perpetrated domestic, family, or sexual violence,
- Collaboration with service providers to manage client safety (including different services' roles and responsibilities in managing client safety),
- Referral pathways for clients experiencing and/or perpetrating domestic, family or sexual violence, and
- Avoiding collusion with a client who may be using violence.

Advanced training

Advanced training should build on the foundational training and support legal practitioners in developing advanced competencies. Advanced training will be required for those working more closely with clients experiencing or using domestic, family, and sexual violence. Such lawyers will include those practicing in domestic and family violence intervention/protection orders, child protection, family law, and victims of crime compensation. It may also include lawyers practicing in migration law, employment and discrimination law, tenancy law, and criminal law. Senior lawyers who supervise junior lawyers should hold advanced competencies, regardless of the area of law that they practice, to support junior lawyers sufficiently.

The following topics likely contribute to this training:

- Coercive control risk identification by legal practitioners,
- Coercive control risk assessment and risk management through integrated practice with community services workers, or in collaboration with external service providers,
- Increased understanding of the impacts on, and experiences of, different groups and individuals,
- Working with victim-survivors and adopting trauma informed, family and domestic violence informed and culturally safe practice,
- Adherence to best practice guidelines,
- Understanding vicarious trauma and ways to self-care,
- Area of law specific information as well as cross-jurisdictional knowledge, and
- Strategies to strengthen collaboration between lawyers and community services workers.

While the core training content topics are broad, they must be tailored significantly for delivery to different audiences.

Training package design to include tailoring of training content

In our experience, training is effective in reaching learning outcomes when it draws upon real client and legal practitioner experiences. Client experiences differ in different states and territories as the health and justice systems respond differently, creating unique challenges. Training is most effective when it is taught in context. To achieve this, content must be developed by organisations that have specialist expertise in domestic and family violence in that state or territory.

Tailoring involves an assessment of the target audience's learning needs, based on their current competencies, the area of law they are practicing in, the demographic of their clients and the system response that they are working within. The information gained from this assessment can inform how the

content is presented. It cannot be overstated, that while all legal practitioners can work towards standardised competencies, the nuanced knowledge and application of skills will differ greatly depending on the role and responsibility of the legal practitioners.

Women's Legal Services have developed and delivered training for legal practitioners working in specialist community legal services, generalist community legal services, legal aid services, private practice, government departments, barristers, and judicial officers. While practitioners in each of these organisations may practice the same area of law, in the same state, their learning needs differ.

The training package design should demonstrate how content will be tailored to recognise that learning needs will differ depending on:

- The state or territory the legal practitioner is working within,
- The area of law practiced,
- The competencies held by the legal practitioner,
- The role and responsibilities of the legal practitioner,
- The organisation the legal practitioner works for, and
- The demographic of the clients the legal practitioner serves.

While the above training topics might be applicable across different states and territories, the content of each topic will differ depending on the state or territory in which the content is being presented. This is in part because the legislation differs across states and territories, but the social context also differs substantially. The grant application guidelines should require grant applicants to demonstrate how the training will be relevant and practical, including with reference to the experiences of clients that legal practitioners are likely to be working with.

Model for delivering training

WLSA acknowledges the Attorney General's Department's desire to ensure that training opportunities are undertaken by as many legal practitioners as possible. It is our view that completion rates need to be balanced with training efficacy.

Based on the experiences of Women's Legal Services in the development of blended training modules that combine an e-learning format with applied practical training components, we recommend the grant require a blended model. In our experience, information sharing can take place through self-led e-learning but practical training needs to accompany e-learning in order for learnings to be embedded into practice. It is also important to consider the accessibility needs of regional and remote practitioners.

Examples of e-learning developed by Women's Legal Services include modules that provide an on-line platform which steps them through expertly created course content, with videos, quizzes, legal identification tools and supporting manuals. This self-paced learning is then supported by live sessions (on-line or in person) with our experienced educators and lawyers to apply knowledge and skills and consolidate their learning.

Completing an aspect of the learning online in a self-paced environment allows legal practitioners to balance their learning with their work demands. Women's Legal Services continue to develop training in this mode, following feedback from learners and key stakeholders of the accessibility and efficacy of this approach. Research also shows this leads to better implementation of learnings and lasting best practice. Providing the e-learning alone can result in superficial engagement with content.

Development and use of resources in the training package

There is a substantial amount of evidence-based literature being produced on family violence response. The literature being produced by specialist family violence service providers, academic institutes and specialist research bodies is available to legal practitioners who actively seek it. In our experience, while this information is often publicly available, legal practitioners are more likely to engage with material if it is directly marketed to them.

Further, even sources that are directly marketed towards lawyers will have limited educational benefit if they are not supported with a practical training component. For example, while the *Family Violence Bench Book*¹⁰ is useful for legal practitioners in understanding the legal response to family violence, it does not provide insight into the lived experience of family violence, challenges to practice and strategies to better support victims-survivors of family violence and hold perpetrators accountable.

Examples on how Women's Legal Services have incorporated online resources into training in order to bridge the gap between the evidence base and practice include:

- Factsheets that present information on different areas of law intersecting with family violence,¹¹
- Webinars providing free online legal information about legal issues pertaining to domestic and family violence,¹² and
- Self-paced e-learning modules.¹³

If additional online resources were to be developed for the training package, the grant applicant should demonstrate how resource development would complement pre-existing resources and ensure that they support, rather than replace, competency-based training.

Grant opportunity guidelines

Expertise required to develop and deliver competency-based family violence training

Based on Women's Legal Service own experience developing and delivering training opportunities that increase the legal sector's capacity to respond to family violence, we believe organisations that are to lead this training package must demonstrate:

- Understanding of gender inequality, gendered violence, and patriarchal power structures,
- Understanding of coercive control legislation and systems response across jurisdictions,
- Understanding of how Aboriginal and Torres Strait Islander people, culturally and linguistically diverse people, people of diverse genders and sexualities, people with a disability, women across their lifespan and women in regional and rural areas experience domestic and family violence,
- Experience developing and delivering competency-based domestic and family violence training,
- Experience completing training needs assessments,
- Experience developing industry plans,
- Experience tailoring and delivering training,
- Experience evaluating competency-based training,
- Experience collaborating with stakeholders across sectors to meet domestic and family violence education outcomes, and
- Experience co-designing domestic and family violence training with sexual, domestic, and family abuse experts including people with lived experience, cultural safety experts, disability advocates and LGBTIQ+ advocates.

¹⁰ Heather Douglas, 'National Domestic and Family Violence Bench Book' <<https://dfvbenchbook.aija.org.au/contents>>.

¹¹ Top End Women's Legal Service, 'Factsheets' <<https://tewls.org.au/factsheets/>>; Women's Legal Service NSW, 'Ask Lois' <<https://asklois.org.au/resources/>>; Women's Legal Service Victoria, 'Useful Information' <<https://www.womenslegal.org.au/useful-information/>>; and Women's Legal Service Qld, 'Information Sheets' <<https://wlsq.org.au/information-sheets/>>.

¹² Women's Legal Service NSW, <<https://asklois.org.au/webinar/>>.

¹³ Women's Legal Service Victoria, <<https://www.womenslegal.org.au/course-details-case-notes/>>.

Project management model

Women’s Legal Services have worked in different project management models that ensure competency-based training represents the diversity of experiences of family violence and is tailored to the learners training needs. Based on that experience working in different partnerships, we have developed the following opinion on the appropriate project management model for a training project that has a national reach.

We see effectiveness and efficiency benefits of a model whereby a peak body, such as WLSA, is funded to coordinate the design and delivery of the training, and would work closely with state and territory-based organisations to provide expertise on tailoring the content to specific jurisdictions. This would involve WLSA managing the project budget, utilising the expertise of Women’s Legal Services, designing an overarching competency framework, designing an industry plan, designing core content modules, supporting the tailoring of content, and developing a training delivery model and an overarching evaluation framework.

WLSA would work with Women’s Legal Services to tailor the package, deliver training, and implement evaluation processes. Women’s Legal Services are best placed to liaise with state and territory stakeholders to assess the learning needs of targeted learners, and provide expertise on tailoring the training modules. Women’s Legal Services could also be sub-contracted to deliver content face-to face in each jurisdiction.

This approach would allow for national coordination to support consistency regarding competency measures, quality of training, and standardised evaluation. It would also ensure that the content is tailored to state and territory contexts appropriately.

Evaluation

When competency-based training is delivered, the competency framework provides a measure for impact. The impact of the training can be determined by how effectively the workforce is building competency. Further, the training can be evaluated in reference to the industry plan, which should establish who the target audience is at each stage of the plan as well as expected outcomes.

While short-term outcomes may be able to be measured in the period of the grant – and it should be a requirement that grant applicants demonstrate how they will monitor and evaluate the impact of the training package designed and delivered – we recommend that consideration be given to how the medium- to longer-term impacts (which relate to, for example, improvements to the legal assistance provided, safety outcomes, etc.) of the training package will be measured.

Findings of any evaluation of the initiative should also be made available to key stakeholders as they can inform other contributions to sector capacity building.

Gaining Continuing Professional Development (CPD) points

Providing recognition for legal practitioners for engaging in domestic and family violence training encourages participation in training. Women’s Legal Services also supports Continuing Professional Development on domestic and family violence becoming mandatory for all legal practitioners.

If training were to become mandatory for all legal practitioners, it would be particularly important to offer a range of training options that aligns with a competency framework, to ensure all training is tailored, relevant and contributed to sector wide capacity building. Further, research has found that family violence training for lawyers needs to be accessible, readily available and free. More generally, a recent report by the Victorian Legal Services Board + Commissioner (VLSB+C), found that:

- cost, including the opportunity costs of attending training, is one of the main obstacles for lawyers in undertaking CPD,
- a significant number of employed lawyers self-fund their own attendance at CPD, rather than their employer, and
- a relatively small amount is spent on CPD annually by the legal sector.¹⁴

¹⁴ Chris Humphreys, *Getting the Point? Review of Continuing Professional Development for Victorian Lawyers* (Victorian Legal Services Board + Commissioner, 2022).

Our consultations with the sector and market analysis have also found a similar trend. In this competitive, tight CPD market we found that family violence training is not prioritised by practitioners and needs to be free (or low cost) and readily available for lawyers and barristers to attend.

Legal Services Boards are responsible for establishing the requirements for training to qualify for Continuing Professional Development (CPD) points. Women's Legal Services support further collaboration between Legal Services Boards and key stakeholders to consolidate what expertise is required to deliver family violence training that qualifies for Continuing Professional Development (CPD) points. Earlier in our submission, we outlined the expertise we consider essential to deliver the training package, which includes training that qualifies for Continuing Professional Development (CPD) points.