



**Submission to the Victorian Department of Justice and
Community Safety**

Rapid review of Victoria's firearms laws

**Submission on behalf of the Bayside Peninsula Integrated
Family Violence Partnership**

3rd February 2026



Our Acknowledgements

Acknowledgement of Country: We acknowledge the people of the Boonwurrung, Bunurong and Wurundjeri tribes of the Kulin Nation who are the traditional owners and custodians of the Aboriginal land of our region. We recognise their continued connection to the land and waters and acknowledge that sovereignty was never ceded. It always was and always will be Aboriginal land.

We embrace diversity in all its forms, and respect everyone's strengths and contributions irrespective of gender, ethnicity, culture, religious beliefs, sexual orientation and political views.

Recognition of Victim Survivors: We recognise the strength and resilience of victim/survivors of family violence, their voices, bravery and experiences continue to inform the work we do. We also honour those who are prevented from coming forward and those whose voices can no longer be heard.

Contents

Executive Summary.....	6
Summary of Key Recommendations	7
About the BPIFVP.....	8
Membership.....	8
Strategic Focus	8
Local Government Areas	9
Rapid Review of Victoria’s Firearms Laws	10
Enhancing community safety and preventing harm.....	10
Relevant findings.....	10
Implication for the Review	10
Licensing schemes, eligibility settings and ongoing monitoring	10
Relevant findings	10
Implication for the Review	11
Appropriate use of intelligence and information in licensing decisions	11
Relevant findings.....	11
Implication for the Review	11
Information sharing between agencies.....	11
Relevant findings	11
Implication for the Review	12
Storage, compliance and enforcement	12
Relevant findings.....	12
Implication for the Review	12
Limiting the number of firearms held.....	12
Relevant findings.....	12
Implication for the Review	13
Imitation firearms, replicas and accessories.....	13
Relevant findings.....	13

Implication for the Review	13
Data, evidence and system-level gaps.....	13
Relevant findings.....	13
Implication for the Review	14
Key Recommendations	15
Explicitly recognise family and sexual violence as a high-risk context in firearms regulation.....	15
Strengthen firearms licensing eligibility to incorporate non-criminal risk information	15
Improve information sharing to support risk assessment and safety planning	15
Introduce numerical caps on firearms ownership	15
Strengthen compliance, storage and transport enforcement	15
Regulate imitation firearms and accessories based on coercive use and perceived threat.....	16
Address data and system gaps that undermine safety.....	16
Appendix	17
BPIFVP Members	17

To: Mr Ken Lay AO APM

Consultation: Rapid review of Victoria's firearms laws

Date: 3rd February 2026

From: Erin Price, Chair
Louise Sheehan, Principal Strategic Advisor
The Bayside Peninsula Integrated Family Violence Partnership
211 Chapel Street, Victoria 3181

Dear Mr Lay,

We write on behalf of the Victorian [Bayside Peninsula Integrated Family Violence Partnership](#), a collaborative partnership of organisations committed to addressing and preventing family violence across the Bayside Peninsula Area (BPA).

Please accept this submission to the Department of Justice and Community Safety's Rapid review of Victoria's firearms laws.

This submission is provided through a family and sexual violence lens, drawing on practice-informed insights from some of our Partnership members. It focuses on how firearms access operates as a distinct and foreseeable risk factor in domestic contexts and outlines regulatory reforms that would strengthen community safety for victim-survivors.

We welcome the opportunity to contribute to the Review and to support reforms that enhance public safety while aligning with Victoria's family violence reform framework.

Yours sincerely,

Erin Price

Chair, Bayside Peninsula Integrated Family Violence Partnership

With Members of the Bayside Peninsula Integrated Family Violence Partnership

Executive Summary

This submission responds to the Rapid Review of Victoria's Firearms Laws through a family and sexual violence (FSV) lens, reflecting how firearms operate as a distinct and foreseeable risk factor in domestic contexts. While many firearms policy discussions focus on public or criminal misuse, this submission centres the everyday, private settings in which firearms significantly increase harm, fear and lethality for victim-survivors.

Drawing on consultation with Partnership members, the submission highlights consistent practice-based evidence that firearms fundamentally alter the dynamics of family and sexual violence. Firearms increase lethality, intensify coercive control and threats, and deepen victim-survivors' fear, entrapment and reluctance to report or leave violence. The presence of firearms, even without use, escalates risk and extends harm, including post-separation.

The consultation identified that Victoria's current firearms licensing and eligibility settings rely too heavily on criminal justice thresholds and do not adequately reflect how family violence risk is identified and managed in practice. Given the prevalence of under-reporting and the cumulative nature of coercive control in family violence, Partnership members strongly supported the use of non-criminal intelligence and service-held risk information in licensing, suspension and revocation decisions. Firearms licensing was consistently understood as an administrative public safety function, rather than a punitive measure.

Improved information sharing was identified as critical to effective risk assessment and safety planning. In particular, alignment with the Family Violence Information Sharing Scheme (FVISS), Child Information Sharing Scheme (CISS) and the Multi-agency Risk Assessment and Management (MARAM) Framework, and access to firearms licensing and ownership information, would materially strengthen responses for victim-survivors. Partnership members also emphasised the importance of interim removal, search and seizure powers during family violence investigations, noting that these measures both reduce immediate risk and lower barriers to reporting.

Additional priorities included stronger compliance and storage enforcement, numerical caps on firearms ownership, regulatory responses to imitation firearms based on

perceived threat, and addressing persistent data gaps that undermine accountability and safety.

Overall, this submission supports the Rapid Review's objective of strengthening firearms regulation to enhance community safety and demonstrates that effective reform must explicitly address family and sexual violence as a core risk context for firearms access.

Summary of Key Recommendations

This submission recommends reforms that would strengthen firearms regulation by explicitly addressing family and sexual violence risk, including:

- **Embedding a family and sexual violence lens** within firearms legislation, licensing and regulatory decision-making, recognising coercive control and cumulative harm as core risk factors.
- **Strengthening firearms licensing and eligibility settings** to incorporate non-criminal intelligence and service-held risk information, consistent with licensing as an administrative public safety function.
- **Improving information sharing and system alignment**, including integration with FVISS, CISS, MARAM and the National Firearms Register, with strong survivor-centred safeguards.
- **Reducing overall firearm access and harm potential** through numerical caps, stronger compliance and storage enforcement, and regulatory responses that address perceived firearm threat, including imitation firearms.

For questions or for further information regarding this submission please contact:

Louise Sheehan

Principal Strategic Advisor Bayside Peninsula Integrated Family Violence Partnership

e: louise.sheehan@vt.uniting.org



About the BPIFVP

Established in 2006, the Bayside Peninsula Integrated Family Violence Partnership (BPIFVP) is one of 13 Family Violence Regional Integration Committees (FVRICs) in Victoria. Formed initially to improve the coordination of family violence services, FVRICs are now key in the rollout of the Victorian Government's Family Violence reforms. Since its inception, the BPIFVP has evolved into a platform for collaborative action. The BPIFVP provides leadership, advocacy, and specialist expertise to strengthen, integrate and improve the family violence system, including supporting workforces and building family violence literacy across different service sectors.

The FVRICs are funded by the Victorian Department of Families, Fairness and Housing (DFFH) to support their operation, the role of the Principal Strategic Advisor (PSA) who leads the FVRIC, and area-based projects. The PSA provides leadership in the development, implementation, and monitoring of the integrated approach to family violence in their specific DFFH Area. The PSA works closely with the FVRIC Chair and partnership members.

Further information about the BPIFVP is available on our website, SouthSafe:

<https://southsafe.org.au/about-2/about/>

Membership

The BPIFVP membership cross multiple sectors and Bayside Peninsula Area (BPA) based organisations. The BPIFVP represents government and non-government agencies, family violence services, children and family services, Victoria Police, justice and legal services, housing, community, and health services.

A full list of BPIFVP members can be found in the Appendix.

Strategic Focus

Safety and inclusivity are at the core of everything the BPIFVP does, with the Partnership prioritising the physical, emotional, cultural, and psychological safety of all people with lived and living experience, persons using violence, children and young people, communities, and practitioners. Our approach recognises that sustainable change is only

possible when those impacted by family violence can contribute and lead through their lived realities and when it is grounded in the belief that a truly inclusive, just, and safe system must recognise and respond to the diverse communities we serve.

Our current Strategic Plan, available [here](#), focuses on five pillars:

1. Partnership for systems impact
2. Lived/Living Experience leadership
3. Strengthening our workforce
4. Prevention/early intervention
5. Evidence-informed strategy

Local Government Areas



The BPIFVP encompasses the Victorian LGAs of Bayside City Council, Frankston City Council, Glen Eira City Council, Kingston City Council, Mornington Peninsula Shire Council, Port Phillip City Council, and Stonnington City Council.

Rapid Review of Victoria's Firearms Laws

Enhancing community safety and preventing harm

(Rapid Review TOR¹: overarching imperative to enhance community safety; public safety focus)

Relevant findings

- Firearms significantly increase lethality risk in family and sexual violence contexts.
- Access to firearms intensifies coercive control, threats and intimidation, reinforcing victim-survivor compliance and entrapment.
- Known access to firearms creates enduring fear, including post-separation, even where firearms are not discharged.

Implication for the Review

Firearms regulation must explicitly recognise family and sexual violence as a distinct and elevated risk context. Community safety cannot be adequately addressed without treating firearm access in family violence as a prevention issue, not only a criminal response.

Licensing schemes, eligibility settings and ongoing monitoring

(TOR: licensing scheme design, eligibility requirements, licence duration, monitoring)

Relevant findings

- Current licensing frameworks rely too heavily on criminal justice thresholds, despite widespread under-reporting of family violence.
- Practitioners identified a critical need to consider:
 - Service-held risk information
 - Known patterns of coercive control or threats

¹ References will be made to specific areas of the Department of Justice and Community Service's Rapid Review Terms of Reference (State of Victoria (Department of Premier and Cabinet) December 2025) downloaded from <https://engage.vic.gov.au/victorian-firearms--rapid-review>

- Non-criminal intelligence indicating risk
- Concerns were raised about exemptions for police and defence personnel subject to family violence intervention orders, which undermine accountability and safety.

Implication for the Review

Firearms licensing is an administrative safety mechanism and should incorporate non-criminal risk indicators. Strengthened eligibility settings that draw on service system intelligence would better align licensing decisions with real-world family violence risk.

Appropriate use of intelligence and information in licensing decisions

(TOR: expanded use of criminal intelligence; handling of intelligence in licensing reviews)

Relevant findings

- Partnership members strongly supported the use of non-criminal intelligence to inform licensing decisions, noting this prevents harm without imposing criminal sanctions.
- Current legal standards excluding hearsay in criminal proceedings should not constrain administrative licensing decisions designed to protect public safety.

Implication for the Review

The Review should support clearer authority and guidance for using intelligence and service-held risk information in firearms licensing, suspension and revocation processes, with appropriate procedural safeguards.

Information sharing between agencies

(TOR: information-sharing arrangements to strengthen licensing regimes; alignment with FVISS/CISS)

Relevant findings

- FVISS and CISS information sharing does not consistently include firearms licensing status or history.
- Access to firearms licence information would:

- Improve risk assessment and safety planning
- Support victim-survivor psychoeducation
- Enable more informed decision-making during high-risk periods
- Unlicensed and unregistered firearms remain a significant challenge, reinforcing the need for stronger compliance and enforcement mechanisms.

Implication for the Review

Improved information sharing between police, firearms regulators and family violence services is essential to effective licensing and risk management. Alignment with FVISS/CISS and MARAM would materially strengthen protective responses.

Storage, compliance and enforcement

(TOR: strengthening regulatory frameworks; management of firearms)

Relevant findings

- Inconsistent compliance monitoring, particularly around storage requirements.
- Gaps identified in:
 - Frequency of storage audits
 - Firearm transfer or seizure following the death of a licence holder
 - Safe transport and off-site use practices
- Questions were raised about the appropriateness of storing firearms in metropolitan homes for recreational purposes.

Implication for the Review

Stronger, more frequent compliance and audit mechanisms are required to ensure firearms regulation meaningfully reduces risk, particularly in domestic settings.

Limiting the number of firearms held

(TOR: numerical caps on firearms ownership)

Relevant findings

- Partnership members supported numerical caps as a direct way to reduce harm potential. Suggested caps ranged from 1 to 5 per individual.

- Large numbers of firearms increase fear for victim-survivors and signal elevated risk.
- Reducing firearm volume contributes to cultural change and reduced normalisation of weapons in private homes.

Implication for the Review

Numerical caps would strengthen community safety and reduce risk in family violence contexts, consistent with prevention-focused firearms regulation.

Imitation firearms, replicas and accessories

(TOR: regulatory treatment of imitation firearms and accessories)

Relevant findings

- Limited direct experience reported; however, victim-survivors often perceive firearms as real regardless of classification.
- The harm arises from perceived lethality and threat, not technical firearm status.

Implication for the Review

Regulation should account for the impact of perceived threat and coercive use, not only functional lethality.

Data, evidence and system-level gaps

(TOR: implementation effectiveness; ongoing monitoring and reform)

Relevant findings

- Firearms information is recorded inconsistently across service systems and is rarely aggregated.
- Services identified the need for:
 - Access to firearms licence and ownership data
 - Visibility of the number of firearms stored in the home
 - Better system integration to support risk identification and accountability

Implication for the Review

Data gaps themselves constitute a safety risk. Improved data collection and system visibility are necessary to support effective firearms regulation in family violence contexts.

Key Recommendations

Explicitly recognise family and sexual violence as a high-risk context in firearms regulation

Ensure firearms legislation, licensing policy and decision-making frameworks explicitly recognise family and sexual violence, including coercive control and cumulative harm, as a core and foreseeable risk to community safety.

Strengthen firearms licensing eligibility to incorporate non-criminal risk information

Expand licensing, suspension and revocation criteria to allow systematic consideration of non-criminal intelligence and service-held risk information, consistent with firearms licensing as an administrative public safety function.

Improve information sharing to support risk assessment and safety planning

Align firearms regulation with FVISS, CISS and MARAM by enabling relevant sharing of firearms licensing status, ownership history and risk indicators between police, courts, regulators and family violence services, with strong survivor-centred privacy safeguards.

Introduce numerical caps on firearms ownership

Limit the number of firearms that may be held by an individual to reduce overall harm potential, increase regulatory oversight and decrease fear and risk for victim-survivors in domestic settings.

Strengthen compliance, storage and transport enforcement

Introduce more frequent and consistent compliance audits, including mandatory periodic storage checks, clearer requirements for safe transport and use, and timely seizure or transfer of firearms following a licence holder's death.

Regulate imitation firearms and accessories based on coercive use and perceived threat

Ensure regulatory settings address the harm caused by the use of imitation firearms and accessories in coercive or threatening contexts, recognising that perceived lethality can produce serious harm regardless of technical classification.

Address data and system gaps that undermine safety

Improve collection, visibility and integration of firearms-related data across regulatory and service systems to support effective risk identification, accountability and ongoing monitoring, including through the National Firearms Register.

Appendix

BPIFVP Members

Member Organisation	Community Services Sector/s
Alfred Health	Health Services Mental Health & Alcohol & Other Drug Services
Anglicare	Perpetrator Services (Men's specialist family violence services)
Better Health Network	Perpetrator Services (Men's specialist family violence services)
Better Place	Elder abuse services
BPA Child & Family Services Alliance	Child & Family Services Alliances
City of Port Phillip	Maternal and child health services
Department of Education	Education
Department of Families, Fairness and Housing	Child Protection
Department of Justice and Community Safety	Court services
Emerge	Specialist family violence services
Family Life	Child and family services Perpetrator Services (Men's specialist family violence services)
Good Shepherd	Specialist family violence services Risk assessment and management panels
inTouch	Multicultural services
JewishCare	Multicultural services



Member Organisation	Community Services Sector/s
Peninsula Community Legal Centre	Community legal centres
Peninsula Health	Perpetrator Services (Men's specialist family violence services) Mental Health & Alcohol & Other Drug Services
Victoria Police	
Sacred Heart Mission	Housing and homelessness services
SECASA	Sexual assault services
South Port Community Housing Group	Housing and homelessness services
Southern Homelessness Services Network	Local area service networks (homelessness)
Southside Justice	Community legal centres
The Orange Door	
The Salvation Army	Specialist family violence services
Thorne Harbour Health	Specialist family violence services
Uniting Vic.Tas	Child and family services
Women's Health in the South East (WHISE)	Community and women's health services
Windana	Mental Health & Alcohol & Other Drug Services