



8 December 2025

Department of Social Services
Email: families@dss.gov.au

**Response to Discussion Paper – Department of Social Services
“A new approach to programs for families and children”**

Thank you for the opportunity for the Australian Child Rights Taskforce (‘the Taskforce’) to make a submission to this consultation on the proposed changes to programs for children and families as outlined in the Department’s Discussion Paper.

The Taskforce is a coalition of over a hundred organisations, networks and individuals committed to the protection of the rights of children and young people in Australia.¹ One of the key roles of the Taskforce is to monitor and report on the implementation of the *United Nations Convention on the Rights of the Child* (‘the Convention’). When Australia ratified the Convention in 1990, this was a commitment that every child in Australia should enjoy the rights set out in the Convention. These rights include the right to be protected from violence, abuse, and neglect (Article 19) to the right to family and family support (Articles 5 and 18), and to health and mental health (Articles 24 and 25). The Convention calls for recognition of a child’s ‘evolving capacities’ (Article 5) across the stages of development in childhood and for measures to protect children including those affected by disadvantage (Article 3) and discrimination (Article 2). The Convention calls for consideration of the circumstances of a child’s experience and circumstances, and ongoing assessment and attention to effective protection and support for each child.

In this context, we note that the responsibilities for support for families and children are shared by various levels of government and across portfolios as well as by the wider community. We support consistent and coordinated policy and program solutions that are implemented and monitored across the nation. We also note the recent detailed consideration of several national inquiries² that have built understanding of the measures required to ensure safe environments for all Australians who experience vulnerability and the risk of abuse or neglect, including children and their families and communities.

Our views are guided by the insights provided by international best practice in child rights, and the recommendations of the United Nations Committee on the Rights of the Child (the UN Committee) in its consideration of Australia’s compliance with the Convention.

Our key concern is the lack of coordination and monitoring in the implementation of various measures of child and family support. Whilst we fully support the introduction of a more consistent and coordinated approach in the programs and services provided by the Australian Government through the Department of Social Services, a single national program will only be an initial step in providing the most effective support to children and families.

Programs and services must be monitored and coordinated across governments and portfolios. This should include measurement and integration of existing national frameworks and strategies including *Safe and Supported: National Framework for Protecting Australia’s Children 2021–2031*.

¹ For more information about the Taskforce, please see <https://childrightstaskforce.org.au/>

² <https://www.childabuseroyalcommission.gov.au/>; <https://disability.royalcommission.gov.au/>; <https://www.royalcommission.gov.au/aged-care>

International Child Rights Guidance

In its most recent Concluding Observations³, the UN Committee welcomed the creation of the National Office for Child Safety (2018), the National Framework for Protecting Australia's Children (2009-2020) and the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse (2017) (the Royal Commission).

However, the Committee has remained seriously concerned over many years at the high rates of violence and abuse against children; the disproportionate impacts on Aboriginal and Torres Strait Islander children; the greater vulnerability of children with disabilities amongst other issues. Since the last reporting cycle, the first Australian Child Maltreatment Study has produced its first findings which reinforce the Committee's serious concerns.⁴ The Committee has recommended on two previous reporting cycles that Australia review the action plans of relevant national policy initiatives to prioritize implementation of key prevention measures and responses to violence, including sexual violence against children, and with particular attention to girls; children with disabilities and Aboriginal and Torres Strait Islander children, LGBTI children, children in remote areas, and from communities of culturally and linguistically diverse background.

Governance and Coordination

The Committee has recommended on two previous reporting cycles that Australia adopt a national comprehensive policy and strategy on children that encompasses all areas of the Convention, with sufficient human, technical and financial resources for implementation and review. This should include the authorisation of an appropriate body with a mandate, authority, and resources to oversee with appropriate monitoring of activities at federal, state and territory levels.

The Committee has recommended that Australia ensure that data collected (including relating to violence and abuse), is disaggregated by age, sex, disability, geographic location, origin, and socioeconomic background, to identify vulnerability, and design appropriate special measures.

The Taskforce has developed a **Blueprint for a National Plan for Children and young people** to guide the development of such a coordinated approach.⁵

Recent Developments

The National Framework for Protecting Australia's Children 2009–2020 was followed by the Safe and Supported National Framework for Protecting Australia's Children 2021 – 2031. A review of the previous Framework found that it largely fell short of its objectives (or lacked data) as it “was not supported by a robust logic model or evaluation framework which limited its ability to measure its effectiveness”.⁶ The Taskforce is deeply concerned that this failure has not been addressed in the development and implementation of the new Framework.

The Taskforce is also concerned at the lack of consistent and monitored progress in the implementation of the recommendations of the Royal Commission. After nearly 8 years, the key recommendation (endorsed by the Federal Government and all state and territory Governments) to introduce nationally consistent Child Safe Standards in every jurisdiction is yet to be achieved.

There has been no public reporting on the proposed 10-year Evaluation Framework as recommended by the Royal Commission for the monitoring of its recommendations. A coordinated and consistent approach to ensuring child safety across sectors and jurisdictions is still required but remains missing.

³ <https://www.ohchr.org/en/documents/concluding-observations/committee-rights-child-concluding-observations-combined-fifth-and>

⁴ <https://www.acms.au/>

⁵ <https://www.54reasons.org.au/childrens-plan-blueprint>

⁶ Previously available at this site but no longer

https://www.dss.gov.au/sites/default/files/documents/11_2020/evaluation-national-framework-pwc-report-12-july-2020-updated-oct-2020.pdf

Response to Discussion Paper Questions

Vision and Outcomes

Does the new vision reflect what we all want for children and families?

Are the two main outcomes what we should be working towards for children and families?

Outcome 1: Parents and caregivers are empowered to raise healthy, resilient children.

Outcome 2: Children are supported to grow into healthy, resilient adults.

The vision and outcomes are adequate but lack key elements that should be included in a cohesive national program. There is no ambition that the outcomes should be achieved for all children, regardless of background and circumstances. There is no ownership or allocation of responsibility. Will this be a vision that all Governments and stakeholders can commit to? There is no acknowledgement of the challenges and barriers that will need to be overcome to achieve this vision.

Program Structure

Will a single national program provide more flexibility for your organisation?

Does the service or activity you deliver fit within one of the three funding streams? Do these streams reflect what children and families in your community need now – and what they might need in the future. Are there other changes we could make to the program to help your organisation or community overcome current challenges?

The program structure should be built with a clear set of aims and objectives with overall measures and monitoring. The views and experiences of service providers (and of children and families) should be key measures of effectiveness but in the context of clear and measurable outcomes that are commitments of Governments and the community sector.

Prioritising Investment

Do you agree that the four priorities are the right areas for investment to improve outcomes for children and families? Are there any other priorities or issues you think the department should be focussing on?

The priorities are closer to an appropriate set of aims and objectives but lack a framework for measurement with tools for identifying and allocating to families and communities according to need or disadvantage.

Which families and communities will receive the supports and why? The Evidence Summary begins this process and shares some of the underlying evidence. It notes:

Assessment of need (from Evidence Summary at page 8)

There have been calls to reform funding approaches to recognise the level of need in a community, rather than allocating funding based on the number of people in a community. The following datasets, along with local knowledge and data sources from states, territories and local councils, will help identify community needs.

The Taskforce supports this call for reform of the funding approaches and encourages a transparent and shared approach to identify community needs and the allocation of resources and services based on clear priorities with measures for review. This should be assisted by independent advice and assessment.

Improving Family Wellbeing

Do the proposed focus areas – like supporting families at risk of child protection involvement and young parents – match the needs or priorities of your service?

Are there other groups in your community, or different approaches, that you think the department should consider to better support family wellbeing?

The Taskforce is not a service provider. The key areas of interest are appropriate and can guide a program that seeks to address the current program priorities. However, in the absence of a clear universal vision and coordinated monitoring, assessment and ongoing targeting to meet identified needs, there will be and will continue to be significant gaps in services and outcomes.

The community sector has extraordinary capability and flexibility to identify and respond to needs and priorities. A more flexible programming approach with a clear shared vision and ongoing review of opportunities and outcomes is achievable and will build better outcomes for children, families and communities.

Connected, co-located and integrated services

What are other effective ways, beyond co-location, that you've seen work well to connect and coordinate services for families?

What would you highlight in a grant application to demonstrate a service is connected to the community it serves? What should applicants be assessed on?

Connected, co-located and integrated services are key tools for children, families and communities to receive the services to thrive. As discussed earlier, a program structure with a clear set of aims and objectives and with a framework for overall measures and monitoring built on the best available knowledge of needs, gaps and opportunities offers a more appropriate structure. The ideas, views and experiences of service providers (and of children and families) should be valuable building blocks but in the context of clear and measurable outcomes that are the coordinated commitments of Governments and the community sector.

Responding to Community Need

Beyond locational disadvantage, what other factors should the department consider making sure funding reflects the needs of communities? What's the best way for organisations to show in grant applications, that their service is genuinely meeting the needs of the community?

A broader and transparent approach is required that uses locational disadvantages (based on a range of socio-economic and other data) as a key factor alongside evidence of the measures that build resilient families and communities. A knowledge base shared across governments and stakeholders can be used to measure success and effective outcomes. A range of universal and targeted measures with evidence of impact can be used over time to guide priorities and opportunities for flexible responses from service providers for community needs.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

How could the grant process be designed to support and increase the number of ACCOs delivering services to children and families? What else should be built into the program design to help improve outcomes for Aboriginal and Torres Strait Islander children and families?

The Taskforce endorses the advice of its member organisation SNAICC National Voice for Our Children to guide the program design for Aboriginal and Torres Strait Islander children and families.

Taking a broad approach to program design, there should be clear alignment with the commitments made by Governments under Safe and Supported Commitments and Closing the Gap priority reforms.

There should be a clear focus on transition of funding to ACCOs and to Aboriginal and Torres Strait Islander-led Commissioning. Management and monitoring should recognise Indigenous Data Sovereignty and the self-determination of Aboriginal and Torres Strait Islander communities.

Measuring Outcomes

What types of data would help your organisation better understand its impact and continuously improve its services? What kinds of data or information would be most valuable for you to share, to show how your service is positively impacting children and families?

As discussed earlier, we support the development of a broad and transparent approach to measurement of need and outcomes. It should be aligned to a shared knowledge based on need, priority activities and ongoing service design and development with universal and targeted services and activities aligned with national and coordinated program design and planning.

Final Comments

We recognise that the approach that we propose may require greater financial investment and levels of intergovernmental collaboration. However, we believe that the benefits to children and families would justify a more joined up approach. There is ample evidence to support a more sustained level of preventive and early intervention supports.

We also wish to highlight the importance of the voices of children (as well as families) in how outcomes are understood and measured, as data, impact measurement and as stakeholders in program design and implementation.

Prepared by the Australian Child Rights Taskforce

For contact and further information

Co-Chair

James McDougall

M +61 (0) 419 243 179

E james@policyconsultants.com.au

We acknowledge the Traditional Owners of the lands on which we live and work, and their continuing connection to land, sea and community. We pay our respects to Elders past, present and emerging.