

31 July 2026



Department of Social Services
Consultation on the Second Action Plan
National Plan to End Violence against Women and Children 2022–2032

Attorney General's Department
Consultation to Inform the Second Action Plan
National Strategy to Prevent and Respond to Child Sexual Abuse

Introduction

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 harm from violence, abuse and neglect (Article 19) and from sexual abuse and exploitation (Article 34). The Convention calls for recognition of a child's 'evolving capacities' (Article 5) across the stages of childhood development, for measures to protect children including those affected by disadvantage (Article 3) and discrimination (Article 2); and the importance of building children's participation into policy design, implementation of measures and monitoring and evaluation (Article 12).

Thank you for the opportunity for the Australian Child Rights Taskforce ('the Taskforce') to make a submission to these consultation processes for the Second Action Plans for the *National Plan to End Violence against Women and Children 2022–2032* and the *National Strategy to Prevent and Respond to Child Sexual Abuse*.

We also note that the Australian Government is consulting during this year on new action plans under two other national frameworks:

- the Second Action Plan for *Safe and Supported: The National Framework for Protecting Australia's Children 2021–2031* ('Safe and Supported')
- the Second Aboriginal and Torres Strait Islander Action Plan under *Safe and Supported*
- the First Action Plan for *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036*.

We also refer to our recent related submission to the Departments of Finance and Treasury on the development of a national approach to worker screening in the care and support economy.

The Taskforce endorses the relevant guidance provided by the United Nations Committee on the Rights of the Child ('the UN Child Rights Committee' or 'the UN Committee') through monitoring Australia's implementation of the Convention, including the need for appropriate measures to provide protection from harm from violence, abuse and neglect (Article 19) and from sexual abuse and exploitation (Article 34).;

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

Key Recommendations

The Australian Child Rights Taskforce applauds the Australian Government's efforts to coordinate and link across plans and strategies (a key recommendation of the UN Child Rights Committee).

We call for a stronger shared national approach to preventing violence and supporting safety. Greater coordination is required to address unacceptably high rates of violence and abuse.

Governments have the responsibility to lead, coordinate and ensure monitoring for effectiveness while committing to reforms necessary to address ongoing systems failure.

Australia requires a national comprehensive policy framework with proper monitoring and review.

Concerted effort is required to improve the collection of data to inform measures and responses.

Work on child safety has been inadequate and has lacked oversight and leadership.

Existing policy frameworks and reforms must be more carefully monitored and implemented according to consistent national measures.

Children's views and experiences must be imbedded into all aspects of planning, implementation and monitoring of prevention strategy and responses.

Special attention must be given to groups of children and young people experiencing disadvantage, including Aboriginal and Torres Strait Islander Children and children with disabilities.

The Child Abuse Royal Commission reforms must be revisited and reinvigorated. There must be greater alignment in systems that remain fragmented across jurisdictions and sectors. This should include comprehensive public health strategies for prevention, protection, monitoring of actions to address violence and abuse.

Governance and monitoring of all plans and strategies must be strengthened with empowered and independent oversight.

We encourage a more strategic approach to programs and monitoring in measures for child and family support. This should include a vision of safety and support for all children with shared and monitored progress across governments and portfolios, with nationally consistent measures and outcomes including for safety and protection from violence and abuse. This could start with collaboration across Federal Departments and agencies.

Leadership in the establishment of national standards in youth justice could be incorporated into a coordinated and collaborative approach to child safety that is monitored by an appropriately resourced and independent body or bodies.

This leadership could be provided by a Cabinet level Minister for Children and Young People who could guide interdepartmental cooperation at a federal level to include Departments of Health, Education, Social Services and the Attorneys General. This approach could model cooperation and influence state and territory compliance with international and national standards for child safety and protection from violence.

Developing a Coordinated Approach to Child Safety

The Taskforce applauds the Australian Government's recent efforts to coordinate and link across plans and strategies. This has been a key recommendation of the UN Child Rights Committee over several reporting cycles.

We note and endorse the intention to develop a shared national approach to preventing violence and supporting safety. The challenge is considerable. Whilst all Australian governments may espouse a commitment to an effective and nationally coordinated approach to ending family, domestic and sexual violence, and keeping children safe, the evidence of that commitment is not compelling. In terms of outcomes as the consultation materials set out, rates of family, domestic and sexual violence, and child sexual abuse remain unacceptably high, and the experiences of First Nations children still require urgent attention.

The consultation materials highlight that:

"Violence is shaped by social norms, structural and gender inequality and power imbalances that sit beyond any one system and beyond government alone. It requires action from all of us."

However, Governments have the responsibility to lead, coordinate and monitor for effectiveness while committing to ongoing reforms necessary. As we raised in our submission on worker screening, these reforms include (but are not limited to) an ongoing need for effective measures for safety in workplaces where children are cared for. We support consistent policy solutions that are implemented and monitored across the nation. We recognise and support the need for coordinated action to address those social norms, structural and gender inequality, power imbalances and system stasis. We note the detailed consideration of several national inquiries² that have built understanding of the measures required to lead change and ensure safe environments (including workplaces) for Australians who experience vulnerability and the risk of abuse or neglect.

As noted above, our views are guided by the insights provided by international best practice in child safety and protection, and the recommendations of the UN Child Rights Committee in its consideration of Australia's compliance with the Convention. Our submission draws on these insights in addressing the issues of this joined-up consultation.

One of our key concerns is the lack of coordination and monitoring in and across the implementation of various measures introduced in recent years to address child safety. So, for example, whilst we fully support the introduction of a consistent and more coordinated national approach to worker screening, this measure must be monitored and coordinated alongside other reform initiatives. This should include broad community-based measures that increase awareness of how to create safe environments, public health strategies to prevent abuse, and targeted initiatives to improve training and supervision, and monitoring and reporting on child safety across sectors and jurisdictions.

In addition to existing guidance, there are new challenges and fresh insights that an active approach to planning, implementation and monitoring can address. We note the important work to highlight and address these challenges, including that of:

- The eSafety Commissioner on online safety and emerging issues such as AI;
- Taskforce members such as Save the Children/ 54 reasons and SNAICC in preventing and responding to violence; and
- The Olive Leaf Network in raising awareness of the experience of children in cults and controlling groups.

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 Child Rights 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 UN 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 UN Committee's serious concerns.⁴

The UN 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 of all ages, and with particular attention to girls; children with disabilities; Aboriginal and Torres Strait Islander children; LGBTIQ+ children; children in remote areas; and from communities with a culturally and linguistically diverse background.

The UN 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 clear mandate, authority, and resources to oversee with appropriate monitoring of activities at sectoral, federal, state, territory, and local levels.

The UN Committee has recommended that Australia ensure that data collected relating to violence and abuse, is disaggregated by age, sex, disability, geographic location, origin, and socioeconomic background, to assist 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

The Australian Government has claimed the following achievements in child safety in the last 5 years:

"In 2021, the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030 was launched and the National Office for Child Safety (NOCS), within the Attorney-General's Department, has worked with state and territory governments to build and promote child safe cultures and enhance national arrangements for sharing information across sectors and jurisdictions, including WWCCs and reportable conduct schemes."

In our view, this work has been inadequate and has lacked oversight and leadership. Collaborative efforts to date have yet to establish consistent measures to safeguard children across Australia. The ongoing delays in implementing critical reforms come at a significant cost, with systemic gaps resulting in serious and potentially lifelong impacts on the safety, wellbeing and development of children.

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>

Building Blocks for Coordination

There are several existing policy frameworks that could be used to support a more coordinated and comprehensive approach that drives meaningful reforms. These include:

Safe and Supported: The National Framework for Protecting Australia's Children 2021–2031

National Plan to End Violence against Women and Children 2022–2032

National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030

Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036.

We also note the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse; the proposed national approach to worker screening in the care and support economy; the recommendations for enforceable national standards in Youth Justice systems; and the opportunities generated by funding programs such as the Children and Family Support Program.

Safe and Supported – A wasted opportunity?

Safe and Supported could provide a key opportunity to drive reform for child safety. However, the mechanism has been under-utilised to date. A review of the previous *National Framework for Protecting Australia's Children 2009–2020* 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 remains concerned that this failure has not been addressed in the development, implementation and monitoring of the new Framework.

Safe and Supported has as its overarching aim to reduce child abuse and neglect. The framework identifies four target groups (First Nations children, children with disabilities, children in complex needs families, and children in out-of-home care) and proposes four national areas for action:

1. Provide early and targeted support to vulnerable children and families.
2. Address the disproportionate rate of Aboriginal and Torres Strait Islander children in child protection systems.
3. Improve data development, analysis, and information sharing across the sector.
4. Strengthen the child and family sector and its workforce.

The Framework is to be delivered through two 5-year plans: the *First Action Plan* and the *Aboriginal and Torres Strait Islander First Action Plan*. Key actions under these plans include:

- Early Supports: Tackle social determinants of safety by improving service access.
- Data and Research: Establish a national coordinated data approach.
- Workforce Strategies: Agree on national approaches for a skilled, sustainable workforce.
- Embed the voices and lived experiences of children, young people, and carers into policy design.
- Carer Support: Improve support for both foster and kinship carers.
- Disability Support: Ensure effective responses for children and parents living with disability.
- Implement the Aboriginal and Torres Strait Islander Child Placement Principle.

An Outcomes Framework and a Theory of Change have been developed for each Action Plan.

But in 2026, halfway through the timeline for the Framework, we have no public reporting on progress. According to the DSS webpage for Safe and Supported Reporting:

“The Monitoring and Evaluation Strategy is in development. It will explain how Safe and Supported will be evaluated. This includes how progress will be tracked and reported against the desired outcomes.”

⁶ https://www.dss.gov.au/sites/default/files/documents/11_2020/evaluation-national-framework-pwc-report-12-july-2020-updated-oct-2020.pdf

The National Plan – How are we including children?

The National Plan to Reduce Violence against Women and their Children 2010–2022 concluded with a key criticism that it lacked measures to track progress.⁷

The new *National Plan to End Violence against Women and Children (2022-2032)* has made a stronger commitment to monitoring and outcomes. And yet, its *First Action Plan (2023-2027)* still only contains only one child specific commitment. That commitment is to develop and implement age-appropriate programs for children and young people, that are culturally safe, to intervene early to address violence and support recovery and healing from trauma. Notably, the Plan has no detailed reference to either broad community-based strategies for preventing violence against children or measures that address the vulnerabilities experienced by groups of children.

A recent report from the Domestic, Family and Sexual Violence Commissioner⁸ shared insights from its first children and young people’s roundtable. The Taskforce supports and endorses these efforts to include children and young people in monitoring. The report highlighted significant gaps and exclusions in services and programs especially for older adolescents and unaccompanied children.

In terms of governance and monitoring, the Outcomes Framework for the Plan includes “Outcome 5 - Children and young people are safe in all settings and are effectively supported by systems and services”. No detail of how programs, funding or strategies will coherently address this broad commitment have been provided.⁹ The Progress Update on the DSS website¹⁰ records activities as current, ongoing, finished and in planning. There are a number that relate to data and coordination that are still in the planning phase.

Otherwise, monitoring largely appears to amount to a check list of activities provided by governments with no reference to analysis or evaluation. There are no consequences for lack of implementation or lessons learnt from evaluations. It is unclear how this information will be used to review existing actions and inform the development of the 2nd Action Plan.

In our view, the issue of data and consistent national data sets should be a key priority across each of the Plans and Strategy to build effective monitoring and inform ongoing planning.

Children and Young People as Key Stakeholders

We acknowledge the work of the Domestic, Family and Sexual Violence Commissioner¹¹ in convening a Children and Young People’s roundtable and the important insights obtained through this event.

However, there must be more consistent and comprehensive efforts by all stakeholders, especially governments, to build supports and pay attention to the views and interests of children and young people in all stages of planning to prevent and respond to violence against children and young people.

Child rights principles highlight the importance of building children’s participation into policy design, implementation of measures and monitoring and evaluation (Article 12).

⁷ <https://theconversation.com/the-government-has-released-its-action-plans-to-end-violence-against-women-and-children-will-they-be-enough-211606>

⁸ <https://www.dfsvc.gov.au/sites/default/files/2026-06/20260602-DFSVC-CYP-RoundtableReport.pdf>

⁹ <https://www.dss.gov.au/system/files/resources/performance-measurement-plan.pdf>

¹⁰ <https://www.dss.gov.au/national-plan-end-violence-against-women-and-children/progress/first-action-plan-progress/first-action-plan-activities-addendum>

¹¹ <https://www.dfsvc.gov.au/sites/default/files/2026-06/20260602-DFSVC-CYP-RoundtableReport.pdf>

We endorse the submission of Save the Children / 54 reasons to this consultation and reinforce its key recommendations to:

- Recognise children's experiences of domestic and family violence in their own right,
- Ensure that all services that have contact with children who have experienced domestic and family violence are appropriately skilled and resourced to identify and understand the effects of this violence on children;
- Ensure that children are heard about their experiences of domestic and family violence and participate in policymaking, system-level and individual decisions affecting them in ways that are appropriate, meaningful and safe.
- Improve the data about children and domestic and family violence, including about children's experiences of violence and evidence of effective prevention and support.

We also highlight that the experiences of children and young people of violence are far from uniform and the complexity of these experiences calls for careful attention. For example, child rights advocates in the disability sector have highlighted for some years the need for greater attention to protections for children with disabilities, in particular the need for measures to prohibit the sterilisation of girls with disabilities without their consent. The recommendations from the Disability Royal Commission should be given specific attention.

Children's experiences online often reflect those in real life, and we need better understanding of how technology can facilitate abuse and experiences of violence for children and young people online, whilst also recognising and supporting the positive impacts and supports that technology provides.

The lessons learnt from the Child Abuse Royal Commission have not been exhausted and there remains the need for better understanding of the barriers to prevention and disclosure of abuse or violence that still undermine the safety of so many children and young people.

We endorse the work of The Olive Leaf Network in raising awareness of the experience of children in cults and controlling groups. This work highlights the limitations of regulatory approaches that do not account for cultures and environments for institutions and groups that reject or ignore mainstream values, standards and codes of behaviour and training.

As discussed earlier, governance and monitoring remain inadequate. These issues and the need for consistent national data should be addressed as priorities across the Plans and Strategy to build effective monitoring and inform ongoing planning.

Integrating Measures for Aboriginal and Torres Strait Islander Children – Signs of Progress

*Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence*¹² was launched in early 2026

This plan aims to set direction for government support for services that respond to Family Domestic and Sexual Violence for Aboriginal and Torres Strait Islander women and children through the *National Agreement on Closing the Gap* with particular attention to Target 13. Target 13 states that by 2031, the rate of all forms of family violence and abuse against Aboriginal and Torres Strait Islander women and children is to be reduced by at least 50%.

Once again, we note that the issue of data is fundamental here. There has been no change to the baseline measure which remains the 2018 - 2019 National Aboriginal and Torres Strait Islander Health Survey. Despite this being a priority in the Data Development Plan, it is not possible to track progress for Outcome 13.

The Taskforce acknowledges with support the key role that **SNAICC – National Voice for our Children** has played in the development of the Plan so far. We look forward to appropriate Government support in funding of, and for monitoring of outcomes in programs and strategies to address violence against Aboriginal and Torres Strait Islander children.

Royal Commission Reforms – where is the progress?

The Taskforce is 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.

As noted in the Treasury's Briefing Paper for Worker Screening in the Care Economy, effective worker screening is critical throughout the currently fragmented systems across jurisdictions and sectors. We endorse the Productivity Commission's call for 'greater alignment in quality and safety regulation' in the care and support economy.

We note slow progress in the introduction of recommended reforms from the Royal Commission including national consistency in Working with Children Checks (WWCCs), monitoring of child safe standards in organisational settings and reportable conduct schemes. Each of these approaches are necessary measures for effective protection for children. We do not consider that effective monitoring arrangements have yet been established for child safety in Australia today.

It remains to be seen if the recent commitment to establish a National Continuous Checking Capability to underpin Working with Children Checks will produce more tangible results in a meaningful timeframe. We note the ambition expressed in the Briefing Paper for Worker Screening that worker registration reforms "will support the professionalisation of workers and ensure there are appropriate protections for individuals accessing care." We suggest that much more detailed work is required to achieve this goal, and as set out above we recommend greater oversight and leadership by appropriately mandated authorities.

¹² <https://www.dss.gov.au/first-nations-national-plan-end-family-domestic-and-sexual-violence/resource/our-ways-strong-ways-our-voices-national-aboriginal-and-torres-strait-islander-plan-end-family-domestic-and-sexual-violence-2026-2036>

Both the Royal Commission and the Disability Royal Commission¹³ produced detailed plans and recommendations for the implementation of comprehensive public health strategies for prevention, protection, monitoring, review and remedial actions. These cover training and supervision, monitoring, and reporting. They also call for fundamental changes to establish culture and attitudes that are built on understanding and respect for the human rights of all Australians including those who experience forms of vulnerability and the risk of violence and abuse.

We are concerned that the fundamental changes in the approach to keeping children safe that were committed to by all Australian Governments following the Royal Commission remain unachieved and the momentum to change is in danger of being lost. If the comprehensive and coordinated approach proposed by the Royal Commission, grounded in child rights and a broad public health approach, had remained a priority, many of the further child safety crises¹⁴ that have occurred in recent years could have been avoided or their impacts mediated with clearer responses available.

¹³ <https://www.childabuseroyalcommission.gov.au/>; <https://disability.royalcommission.gov.au/>; <https://www.royalcommission.gov.au/aged-care>

¹⁴ <https://www.abc.net.au/news/2025-10-27/childcare-centres-paedophiles-abuse-four-corners/105926324>; <https://www.theguardian.com/australia-news/2026/jul/21/kumanjavi-little-babys-mother-was-not-supported-to-protect-her-children-while-escaping-domestic-violence-review-found-ntwnfb> ; <https://www.vecra.vic.gov.au/criminal-charges-against-g8-education-limited-allegedly-putting-childs-safety-risk>

National Strategy to Prevent and Respond to Child Sexual Abuse – more activity, real change?

We note the recent release of the evaluation of the First Action Plans for the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030. The Final Evaluation Report dated March 2026 released in July 2026 made 5 recommendations to improve the design and implementation of the next Action Plan.

We highlight the Report’s recommendations in relation to governance and monitoring:

“Strengthen governance arrangements among government stakeholders to improve collaboration and accountability mechanisms. This evaluation has identified opportunities to improve current governance arrangements to promote two-way information sharing, strengthen accountability mechanisms and promote cross-government collaboration, both at federal and jurisdiction levels.

Some examples of steps to strengthen the governance of the National Strategy include:

- *Enhancing jurisdictional input during the design stages of 2AP activities.*
- *Developing partnership agreements or similar mechanisms to formalise partnerships, decision-making and collaboration protocols.*
- *Improving collaboration across governments to avoid duplication and strengthen coordination of responses. It is critical to ensure that future research and scoping activities are better aligned to minimise instances of duplication across future NAP / CAP activities.”*

Establish more consistent and comprehensive monitoring, evaluation and reporting mechanisms to enable robust assessments of the degree to which future action plan activities have contributed to medium- and long-term outcomes included in the National Strategy’s M&E Framework.

The approach to evaluating the effectiveness and impact of National Strategy activities could be more consistent and aligned with the National Strategy’s M&E Framework. This can be achieved through:

- *Encouraging the establishment of consistent embedded evaluation approaches across reform activities.*
- *Ensuring the intended outcomes of individual activities are aligned with those included in the overarching M&E Framework.*
- *Integrate the voice of service providers as well as victims and survivors in monitoring and evaluation.*
- *Ensuring there is sufficient resourcing to support consistent monitoring and evaluation approaches.*
- *Ensuring existing governance arrangements support ongoing monitoring and evaluation of the National Strategy.*
- *Establishing realistic and sufficient timeframes for data collection and stakeholder engagement.”*

Whilst we support these recommendations, we also raise the need for strong independent governance that challenges and holds to account the efforts of all Government stakeholders. The levers to ensure that all Governments, including State and Territory Governments, report reliably according to independently developed and nationally consistent measures of progress and achievement are required.

Opportunities to use Program Reform to Lever Change

In December 2025, the Taskforce made a submission in response to the consultation conducted by the Department of Social Services to inform reform of its programs for children and families. In this submission, we noted 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 reiterated our support for consistent and coordinated policy and program solutions that are implemented and monitored across the nation.

We connected our views once again with the work of recent Royal Commissions¹⁵ 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 key concern was (again) the lack of coordination and monitoring in the implementation of various measures, this time for child and family support. We endorsed 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 but noted that a single national program will only be an initial step in providing the most effective support to children and families.

Programs and services should be monitored and coordinated across governments and portfolios. This could and should include measurement across existing national frameworks and strategies including *Safe and Supported* with its stated aim of providing early and targeted support to vulnerable children and families.

The current program lacks the ambition to form part of a cohesive national program across governments. As a result, at a national level, there is also no ambition for outcomes (including of safety and protection from violence and abuse) that should be **achieved for all children, regardless of background and circumstances**.

For a coherent and effective Children and Family Support Program (as with the related policy frameworks), there is a critical need for attention to the arrangements for shared or allocated ownership or responsibility including with state and territory governments. There will be lessons to be learnt from the approach taken in health and education in developing cooperative and collaborative Federal and state and territory arrangements. And with a cohesive vision, there is a greater opportunity to acknowledge the challenges and barriers that need to be overcome to achieve the vision.

We would welcome a program structure 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 providers.

We note that the DSS Program consultation proposed a focus area of ‘supporting families at risk of child protection involvement’. This represents one (and only one) area of possible preventative intervention to address disadvantage. There are other approaches that could build and coordinate activities across health, education, violence prevention, and justice.

¹⁵ <https://www.childabuseroyalcommission.gov.au/>; <https://disability.royalcommission.gov.au/>; <https://www.royalcommission.gov.au/aged-care>

With a coordinated approach, a shared vision with other stakeholders and a rigorous and independent monitoring framework, there is an opportunity to shape and reform not only service systems but also environments and communities.

This could be integrated and supported by other program objectives already identified (*connected, co-located and integrated services; more effective responses to community need*) and existing challenges including improving outcomes for Aboriginal and Torres Strait Islander children and families.

Many of these objectives align closely with the recommendations of the UN Child Rights Committee (see **International Child Rights Guidance** in earlier text from this submission).

We do welcome the inclusion in the most recent **DSS Children and Family Support Guidelines** (July 2026) of the requirement that successful program providers embed a child rights-based approach in the delivery of their activities. This important step should be reinforced with a strong commitment to the same approach in the planning and implementation of all aspects of the Program including in the role of Governments.

Governance and Measuring Outcomes

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.

There is a significant opportunity to develop better data systems and monitoring especially at a national level. This can align with the principles of Indigenous Data Sovereignty and be incorporated into the Closing the Gap Priority Reform Area 4 as foundational good practice

The opportunities with a more comprehensive and accountable approach to child safety include child protection reform, addressing entrenched disadvantage and promote the development of better practice in a range of social services.

Child Safety Systems to include Youth Justice

We take this opportunity to share recent evidence presented to the Senate Legal and Constitutional Affairs Committee in its Inquiry into Australia's Youth Justice System. We provided the following suggestions of steps to build better safety outcomes for children and young people in youth justice systems, once again building on existing recommendations and opportunities.

Our contributions are framed on our own work on child rights governance¹⁶ and the advice to the Taskforce by academic lawyers Professor Patrick Keyzer, Dr Sevda Clark and Dr Christopher Goff on 'The Constitutional Powers of the Commonwealth with respect to Child Rights' who have noted that:

*"There is extensive constitutional scope for the Commonwealth to expand its support for children and its legislative protection of their rights. What has been lacking is the appetite of Australian governments to evolve and expand their activities regarding children through use of existing Commonwealth powers in new contexts, or through enhanced Commonwealth-state cooperation."*¹⁷

¹⁶ <https://www.54reasons.org.au/resources/a-blueprint-for-a-national-childrens-plan>

¹⁷ [Legal opinion - The Constitution Powers re Child Rights \(July 2023\).pdf](#)

Some of the opportunities from our evidence and that of other witnesses include:

Design and Governance

- Establish national standards for youth justice systems with a detailed plan for implementation and enforcement that is monitored by an appropriately resourced and independent body such as the National Taskforce recommended in “Help Way Earlier”; The plan should include oversight of reforms in coordination, data and monitoring;
- Build coordination of support for programs that address pathways into youth justice.

Commonwealth Government Leadership

- Establish Cabinet level responsibility such as a Minister for Children and Young People;
- Build interdepartmental cooperation at a federal level that includes Departments of Health, Education, Social Services and the Attorneys General to model cooperation and influence state and territory compliance with international and national standards;
- Revisit and reinvigorate the full implementation of OPCAT;
- Review and reinvigorate the implementation of Child Safe Standards to include oversight of youth justice and related systems;
- Support and build on the coordination of effort on violence and abuse prevention by the DSS and AGD to include Health, Disability and Education firstly at a federal level and then to guide youth justice and related systems including at a state and territory level;
- Raise the age of criminal responsibility for Commonwealth crimes.

Monitoring and Accountability

- Develop and properly resource effective models of accountability for national standards using the expertise of Children’s Commissioners and Guardians (and related statutory bodies) led by the National Children’s Commissioner and the National Commissioner for Aboriginal and Torres Strait Islander Children;
- The model or models of accountability should complement or align with independent and properly resourced statutory oversight of national plans and frameworks including the Justice Policy Partnership, Safe and Supported, Child Safe Standards, National Plan to End Violence and Closing the Gap.

Data

- Support and build on coordination of effort in nationally consistent data for outcomes for children, to include AIHW and the Productivity Commission, perhaps led by the Health Department with guidance from ARACY.
- Build a national database on youth justice and restorative justice programs drawing on Australian and international evidence including review of impacts of DSS funded and other place-based supports and AGD Justice Reinvestment to build knowledge base on effective community safety initiatives;
- Revisit and reinvigorate efforts to raise the age of criminal responsibility in all jurisdictions with a review of the ACT Government’s approach.

Final Comments

The Australian Child Rights Taskforce applauds the Australian Government's efforts to coordinate and link across plans and strategies. We have called for a stronger shared national approach to preventing violence and supporting safety. Greater coordination is required to address unacceptably high rates of violence and abuse including to children.

Governments have the responsibility to lead, coordinate and monitor for effectiveness while committing to reforms necessary to address ongoing systems failure.

We highlight the importance of the voices of children (as well as families) in how outcomes are understood and measured.

This may require financial investment and increased levels of intergovernmental collaboration. However, we believe that the benefits to children and families justify it.

Prepared by the Australian Child Rights Taskforce

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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.