

AbSec Submission

Commonwealth Department of Social Services: A new approach to programs for families and children

Recommendations

1. Dedicated funding for ACCO early intervention and prevention

The program should seek to act as a circuit breaker for spiralling downstream statutory spending by incorporating a dedicated funding stream for ACCO-delivered early intervention and prevention supports. Funding must:

- Be proportionate to local needs including the number of Aboriginal and Torres Strait Islander children reported at risk
- Cover the actual costs of culturally grounded service delivery, including cultural load for practitioners and the extra costs associated with regional/remote working.
- Offer support for ACCOs to compete fairly for funds in other service streams against larger organisations. For example, by providing, capability-building supports and grant-writing assistance.

2. Embed Indigenous Data Sovereignty and Governance (IDS&G)

Government must operationalise Priority Reform 4 of Closing the Gap within all data, reporting and evidence requirements, including the DSS Data Exchange, to ensure Aboriginal communities benefit from and maintain control over their own data. Additionally, disparities in data and analytic capacity should be addressed through additional supports to ACCOs.

3. Invest in connected, integrated, place-based ACCO service models

Government must resource models that strengthen collaboration and service connectivity, such as ACCO-led place-based partnerships. These approaches improve accessibility, coordination and outcomes across multiple domains.

Introduction

AbSec welcomes the opportunity to provide input on the Department of Social Services new approach to child and family programs. We are broadly supportive of the changes proposed. These changes will generally drive positive change for the sector by reducing administrative burdens and reporting requirements. The proposed focus on Aboriginal Community-Controlled Organisation (ACCOs) delivered supports, Aboriginal and Torres Strait Islander outcomes and expanded early intervention and prevention supports is welcome and sorely needed. Throughout this submission, AbSec offer recommendations for how the program can be strengthened to better address chronic issues in Australian child protection systems and better meet Closing the Gap Priority Reforms and Socio-economic Targets.



Discussion

Focus on Early intervention and Prevention

AbSec have consistently advocated for the redirection of State and Federal investment from downstream interventions, such as statutory child protection, to early intervention and holistic supports upstream at the pre-risk and pre-removal stages. For example, in New South Wales, funding for early intervention and prevention has not kept pace with the growing number of children reported at risk of significant harm (ROSH) while funding for out-of-home care (OOHC) has risen by at least \$330 million in the last two years alone for non-government organisations¹. The child protection system in New South Wales has for too long been trapped in a loop where rising numbers of children in out-of-home care (OOHC) prompts governments to allocate greater funding to support the statutory system at the expense of early intervention.

The DSS proposal is an opportunity to serve as a circuit breaker, providing the injection of funds needed to uplift and enhance early, ACCO-delivered supports to prevent child protection involvement and break the cycle.

We strongly encourage DSS to set minimum funding allocations in this program to ACCO-delivered early intervention and intensive family supports to break this cycle and prevent lifelong health, economic, justice and cultural harms associated with child protection involvement.

No Aboriginal and Torres Strait Islander specific funding

We note the program is intended to 'prioritise ACCO-led service delivery in communities with significant First Nations population' but are concerned this will fail to translate into meaningful funding increases to ACCOs. The proposed program must include a dedicated funding stream for services provided by ACCOs. Without such a dedicated funding stream, it is highly likely that funding will go to larger non-ACCO NGOs and other organisations with more staff, organisational capacity, in house data and analysis capability and greater capability for writing professional and competitive grant applications. AbSec have seen funding targets and commitments set and failed because they did not include a dedicated ACCO funding stream. For example, the NSW Department of Communities and Justice has had a target of 30% funding for ACCOs for delivery of Targeted Early Intervention (TEI) services since 2017, as of 2025 ACCOs receive less than 10%¹. Under the new funding currently being negotiated with TEI providers, it will not increase to any more than 15% for at least the next five years.

While AbSec welcome the relational contracting approach outlined in this proposal, additional supports for ACCOs to develop, lodge and win competitive grants is recommended. AbSec's own ACCO grant writing support program demonstrates the

¹ Department of Communities and Justice, [Aboriginal-led Data Sharing Dashboard](#), 2025



efficacy of this approach in uplifting the competitiveness of ACCOs in the grant funding space.

Indigenous Data Sovereignty and Governance

The discussion paper outlines that the new program will focus on services which are evidence-informed, and data driven. While AbSec supports this, careful consideration must be given to the differing capabilities of larger, non-ACCO NGOs to collect, analyse and prepare compelling, evidence-informed quantitative materials.

Additionally, the discussion paper outlines that providers will be required to report through the DSS Data Exchange but makes no mention of how the principles of Indigenous Data Sovereignty and Governance have been considered or operationalised regarding this requirement. Without genuine and considered effort conducted with ACCOs to operationalise Indigenous Data Sovereignty and Governance principles throughout the new program, Aboriginal and Torres Strait Islander communities and organisations will continue to be systematically excluded as beneficiaries of their own data.

Prioritising Investment

AbSec supports the four investment priorities outlined in the discussion paper: early intervention; integrated services; services informed by community needs; and Aboriginal and Torres Strait Islander children and young people and ACCOs.

We note that item 4 only states a goal to increase the number of ACCOs delivering services. While increasing the number of individual ACCOs must occur, particularly in regional and remote areas, it should be made explicit that proportionate funding to ACCOs will take place i.e. ACCOs are funded adequately to provide services to all Aboriginal and Torres Strait Islander children in, or at risk of entering OOH in their region. To achieve this, funding must account for costs associated with the cultural load on the Aboriginal workforce, culturally safe, holistic service delivery provided by ACCOs, and account for additional overheads for regional and remote service providers.

Key Focus Areas

AbSec are supportive of focusing supports on families at risk of child protection involvement. We recommend that this include a clear and specific focus on Aboriginal and Torres Strait Islander children and families. This should include a clear commitment to ACCOs delivering these services for Aboriginal and Torres Strait Islander children and families.

AbSec support DSS programs adopting an expanded focus on prevention and early intervention during the first 2,000 days of life given the strong evidence base for the importance of this period ². As discussed above, we encourage DSS to aim to uplift

² New South Wales Health, [First 2,000 days of life](#), 2020



early intervention supports for children and young people of all ages, including those under 2,000 days old and at risk of child protection involvement.

Connected, co-located, and integrated services

There are various models which have been shown to secure positive outcomes for children and families, including particularly those involving place-based partnerships and more integrated services. Place-based partnerships such as the Tamworth-based Aboriginal Community Controlled Organisations coalition show promising early signs of enhancing collaboration between organisations to uplift outcomes across multiple domains. Additionally, increasing self-referrals and community-referrals to ACCOs is crucial for growing the ACCO sector and improving the visibility, accessibility and usage of these services.

Conclusion

AbSec broadly support the proposed changes to Commonwealth child and family programs. It is crucial that this incorporates a distinct and protected funding stream for properly resourced ACCO-delivered early intervention and prevention supports that is proportional to community needs and inclusive of the real costs of culturally safe service delivery wherever that may be. Finally, we encourage co-design with ACCOs to develop and implement effective approaches to Indigenous Data Sovereignty and Governance.

