



5 December 2025

The Honorable Tanya Plibersek MP  
Minister for Social Services  
E: [families@dss.gov.au](mailto:families@dss.gov.au)

Dear Minister,

**RE: A new approach to programs for families and children – Discussion Paper**

Please find attached a submission to the Department of Social Services, written in direct response to the Discussion Paper, 'A new approach to programs for families and children', listed on the Department of Social Services website.

**About Ending Violence Against Women Queensland (EVAWQ)**

Ending Violence Against Women Queensland (EVAWQ) is a network that provides a representative and united voice for Queensland women and children affected by gender-based violence, and the individuals and service agencies that provide specialist support. EVAWQ brings together the knowledge of the Domestic Violence, Sexual Assault, Women's Refuge and Women's Health Services in a collaborative way to focus on preventing men's violence. Successful activation of violence prevention is key to stopping the ever-increasing statistics of men's perpetration of violence against women and children. The EVAWQ peak creates opportunities to collaborate, share, advocate and activate violence prevention.

EVAWQ's provides expert advice and fosters partnerships at both state and national levels. EVAWQ's submissions, to positively inform and influence government policy, have included violence prevention, law reform, school curriculum, and women's safety and wellbeing. EVAWQ regularly engages with government, on behalf of a diversity of specialist sector organisations, to provide advice in relation to emerging trends, service demands and funding equity.

If you have any questions about this submission, you are welcome to contact me at [info@evawq.org](mailto:info@evawq.org).

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## **Submission to Discussion Paper 1: A New Approach to Programs for Families and Children**

Strengthened, Full-Length Submission Integrating DSS Evidence Summary, Consultation Summary, Queensland Reform Reports, Feminist DFV Service Evidence, ACCO Leadership, and National Plan Alignment.

### **Executive Summary**

This submission responds to Discussion Paper 1, addressing the consolidation of five existing Commonwealth programs—including Specialised Family Violence Services—into a single national 'Families and Children Program.' It draws on the DSS Evidence Summary, Consultation Summary, 40+ years of Queensland feminist domestic, family and sexual violence sector development, major Queensland reform inquiries (Not Now, Not Ever; Hear Her Voice), Queensland DFV Practice Standards, the National Plan to End Violence Against Women and Children, international evidence on feminist women's rights organisations, and institutional abuse inquiries.

The submission argues that Specialist DFV Services (SFVS) must be protected and strengthened within Stream 3 of the new program. DFSV is a primary driver of child harm, family breakdown, homelessness and system involvement. Specialist feminist services deliver superior outcomes due to their gendered, trauma-informed, place-based and system-literate practice.

Key recommendations include embedding SFVS explicitly, aligning commissioning with DFV Standards, prioritising feminist and ACCO-led organisations, adopting relational contracting, establishing capital infrastructure funding for small specialist organisations, safeguarding faith-based delivery, improving outcome measurement, and ensuring full alignment with the National Plan's Prevention, Early Intervention, Response and Recovery domains.



## Full Submission

### 1. Vision and Outcomes

#### 1.1 Agreement with the Vision

The DSS Evidence Summary emphasises early investment, place-based services, integration, and improved access. However, the vision fails to mention domestic, family and sexual violence (DFSV), a leading cause of child harm and family crisis. Queensland inquiries (Not Now, Not Ever; Hear Her Voice) clearly establish DFSV as a core driver of trauma and system involvement with children and families.

**Recommendation:** Explicitly reference safety from DFSV in the program vision.

#### 1.2 Outcomes

The proposed outcomes require expansion to address safety and freedom from violence.

Add Outcome 3: Individuals and families are safe, supported, and free from domestic, family and sexual violence.

### 2. Working Together — Principles and Partnerships

#### 2.1 Principles

The reform's principles align with integrated practice but fail to explicitly recognise specialist feminist and ACCO-led DFV services as essential partners.

#### 2.2 Missing Principles

- Safety First
- Gender Equality & Human Rights
- Lived Experience Leadership
- First Nations Self-Determination
- Recognition of Feminist DFV Expertise

### 3. Program Structure

#### 3.1 Three-Stream Model

The model is viable only if Specialist DFV Services (SFVS) are explicitly named and protected within Stream 3. DFSV requires a gendered trauma-informed, intersectional, legal and systems-literate expertise.



### 3.2 Complex Needs

Families affected by DFV present the highest risk and complexity. Specialist services must lead risk and safety responses.

### 3.3 Missing Components

- DFSV safeguarding framework
- Alignment with DFV Standards
- Mandatory DFV literacy for generalist providers

## 4. Relational Contracting

### 4.1 Value of Relational Contracting

Aligns with DSS goals of reduced red tape and outcomes-focused delivery. Essential for specialist, high-risk work requiring responsiveness.

### 4.2 Structure

- Long-term funding
- Joint governance
- Survivor advisory mechanisms
- Flexible activities
- System-level outcomes

### 4.3 When Used

All DFSV and complex family work.

## 5. First Nations ACCO Leadership

### 5.1 Support for ACCO Roles

The reform's focus on improved outcomes for First Nations families aligns with the need for ACCO leadership in DFSV responses.

### 5.2 Requirements

- Dedicated First Nations DFV funding
- Priority for First Nations women's organisations
- Cultural safety governance



## 6. Access, Reporting and Outcomes

### 6.1 Access

DFV access must prioritise trauma-informed, culturally safe, confidential environments, outreach capacity, and co-location with justice, health, housing and child protection.

### 6.2 Outcome Measurement

Safety and Stability: DFV incidence, housing stability, justice outcomes

Recovery: healing, children's wellbeing, economic independence

System Improvement: coordination, reduced misidentification, reduced crisis reliance

### 6.3 DEX Adaptation

- DFV-specific indicators
- Narrative reporting
- Survivor-controlled data
- Cultural data sovereignty

## 7. Workforce

### 7.1 Workforce Challenges

Specialist DFV workforce shortages, burnout, inadequate pay (SCHADS), and high trauma exposure require sustained investment.

### 7.2 Supports Needed

- Alignment with DFV Standards
- Clinical supervision
- Trauma-informed organisational care
- Cultural safety capability
- Lived experience pathways

## 8. Service Suitability and Provider Risk

### 8.1 Suitability Tests

Providers must demonstrate specialist DFV capability, gender-informed practice, cultural safety, community trust and integration capacity.

Services must also demonstrate genuine ongoing links to the area of service provision and an understanding of local community need and systems pathways. A genuine commitment to being



present in the local community area and engaging meaningfully with the local service system should be mandatory.

## 8.2 Risks of Faith-Based Providers

Research and Royal Commission evidence highlight risks including gender hierarchy, minimization and denial of abuse and internal dispute handling. Require:

- Gender equality commitments
- Child safe and safeguarding practices
- Independent governance
- Mandatory reporting
- Clear referral pathways

## 9. Capital Infrastructure for Small Specialist Organisations

Integrated, co-located, place-based services—central to DSS reform—require safe physical environments. Smaller feminist and ACCO organisations lack sufficient capital, limiting prevention, early intervention and crisis response reach.

- Capital funding would support:
- Trauma-informed design
- Women-only safe spaces
- Child-safe rooms
- Outreach hubs
- Co-location with justice, health, housing services

Recommendation: Establish a national capital fund for small specialist feminist organisations, ACCOs and women's services.

## 10. Governance and Reporting

### 10.1 Governance

Require DSS—sector governance tables, survivor representation, ACCO leadership, and regional oversight mechanisms.

### 10.2 Reporting

Must align to National Plan domains, include narrative and culturally safe data methods, reduce red tape, and protect confidentiality.



## 11. Summary of Recommendations

1. Explicitly name DFV in the program's vision and outcomes.
2. Embed Specialist DFV Services within Stream 3.
3. Align commissioning with state DFV Practice Standards.
4. Prioritise feminist, WRO and ACCO providers, with a focus on those with enduring meaningful service delivery in the local community.
5. Adopt relational contracting for DFV work.
6. Fund capital infrastructure for small specialist services.
7. Safeguard faith-based delivery.
8. Align fully with the National Plan.
9. Centre gender equality, cultural safety, lived experience and trauma-informed practice