

Response to DSS consultation

A new approach to programs for families and children

December 2025

We acknowledge the Traditional Custodians of all the lands on which Jesuit Social Services operates and pay respect to their Elders past and present. We express our gratitude for their love and care of people, community, land and all life.



Jesuit Social Services: Who we are and what we do

Jesuit Social Services is a social change organisation working to build a just society where all people can thrive. For almost 50 years, we have accompanied members of the community facing the greatest challenges, delivering support services and advocating for improved legislation, policy and resources to achieve strong, cohesive and vibrant communities where every individual can play their role and flourish. We are a national organisation with a significant footprint in Victoria, New South Wales and the Northern Territory.

Our service delivery and advocacy focus on the following key areas:

- Justice and crime prevention: working with adults and young people involved with the justice system
- Gender justice: providing leadership on the reduction of violence and other harmful behaviours prevalent among boys and men, and building new approaches to improve their wellbeing and keep families and communities safe
- Mental health and wellbeing: supporting people with multiple and complex needs, including mental illness, substance use, trauma, homelessness, and complex bereavement
- Education, training and employment: working with people who face barriers to sustainable employment
- Settlement and community-building: supporting recently arrived immigrants and refugees, and disadvantaged communities
- Climate and ecological justice: mobilising place-based practices, policies and actions that can be taken by governments, individuals, organisations and the community services sector within Australia, to build a climate resilient and ecologically just society.

Summary

Jesuit Social Services welcomes the opportunity to provide feedback on DSS' reform agenda for programs supporting families and children. While we don't currently deliver any of the five Family and Children's Services (FaCS) in scope for the proposed reforms, we work every day with children and young people, their families and communities.

Through our work with children and young people involved in the criminal justice system and those with complex needs, we have come to understand the impact of harm and trauma on their lives, as well as other factors that limit their ability to flourish. A key strategic priority for our organisation has been to find ways to intervene earlier, and we see clear gaps in comprehensive responses for children who are at risk, particularly those who have experienced harm and those facing complex and chronic disadvantage. Often responses come too late, or through punitive measures in the criminal justice system.

We welcome confirmation from DSS that any organisation can apply for funding under the new program. A single national program has the potential to provide more flexibility for many organisations, including those working outside of, or across, current funding silos.

We note that government policies, spending, and the structure of services and systems, often don't reflect an understanding of, or adequate response to, childhood trauma and children's experiences of poverty and disadvantage. We support the proposed reforms as one element of a response to this challenge. We recommend that a key priority in realising the proposed outcomes should be supporting joined up delivery across federal and state/territory services, and overcoming barriers to integrating federal and state/territory systems.

We welcome the objective to make grant and reporting processes simpler, as well as DSS's openness to a more genuine partnership with the community sector. **Contracting approaches must ensure a diversity of providers and support flexible, local solutions to local problems.** The consultation's evidence summary recognises the insights from our [Dropping off the Edge 2021](#) report in relation to the complex and entrenched disadvantage experienced by a small number of locations in each state and territory across Australia. The redesigned FaCS program has the potential to recognise the expertise of organisations who have been embedded in such communities for long periods, sometimes without targeted funding.

A sophisticated approach to early intervention with young people and families is also critical to prioritising investment. Addressing underlying problems through prevention and early intervention, and breaking cycles of disadvantage and abuse, lies at the heart of Jesuit Social Services' work, and our submission proposes an **expansion of the interest areas for improving family wellbeing** to include a stronger focus on:

- young people in middle childhood and adolescence who are disengaging, or disengaged, from education
- adolescents who are at risk of using violence or harmful sexual behaviour

- families where there is evidence of violence or abuse in the home – including a recognition of the need for healing and recovery for young people who are victim-survivors of violence and harm
- families where parents and/or children are in contact with the criminal justice system
- children aged 6–16, given specific sets of risk factors that can emerge during this period.

We strongly support the focus on strengthening services for Aboriginal and Torres Strait Islander children and families through progressing the commitment to Priority Reform 2 of the National Agreement on Closing the Gap. Specifically, we believe there should be **capacity for emerging Aboriginal Community Controlled Organisations (ACCOs) working with children and families in to secure funding to engage established organisations of their choosing (ACCO or mainstream) to work in partnership to strengthen their capacity to design, lead, deliver and govern services and programs that meet the needs of communities.**

If developed through a genuine partnership with the community sector, these reforms offer a meaningful opportunity to reshape how government and community services work together.

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?

We support the proposed vision and outcomes, however we call for the inclusion of *strong and self-determining communities* and *supportive and accessible systems* as fundamental to the vision, acknowledging the broader ecosystem within which families live. Healthy communities are integral to healthy and resilient children, and systems must protect children's rights, meet their needs and foster their potential. Good quality, accessible and sustainable service systems underpin the vision of healthy, resilient children. This includes universal services – and given these are administered at the state and territory level, overcoming barriers to integrating federal and state/territory systems should be a clear priority for the federal government in realising the proposed outcomes.

We also note that:

- The program's definition of 'families' should be flexible and adaptable, reflecting the diversity of family structures and identities across Australia.
- The definition of 'community' should also be flexible, recognising that the most meaningful community will differ depending on the person, family, and policy or environmental context. It may be geographic, ethnic or cultural – for example, the Mt Druitt community, the South Sudanese community in Melbourne's west, or the community living in the public housing towers in Kensington.
- Parents and caregivers need to be more than 'empowered' – they need to be supported and resourced.

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 changes we could make to the program to help your organisation or community overcome current challenges.

A single national program has the potential to provide greater flexibility for our organisation, and we support the proposed streams as reflective of the needs in the communities where we work. This includes national programs with few eligibility restrictions (e.g. What's ok? Australia, see p.6–7); prevention and early intervention (e.g. our Change Makers program (see p.8); and our place-based community development work. See pp.10–11); and a range more intensive supports (such as individually tailored and flexible support services for young people who have multiple and complex needs).

A key challenge for our organisation is the need to rely on fragmented funding sources, including philanthropy, for some services. Further on in our response we propose refinements to investment priorities to ensure that a broader range of vital work is recognised and funded.

What's ok? Australia

One of our key priorities is strengthening early intervention approaches for adults and young people to prevent child sexual abuse and address the harms stemming from

pornography. With funding from the Attorney-General's department, we will soon launch the national child sexual abuse offending prevention service next year, which will build on our work piloting Stop It Now! Australia.

While Stop It Now! focuses on child sexual abuse by adults, we are also focussed on the issue of child sexual abuse as a result of the behaviour of other children. In August 2025 we launched the What's ok? Australia: Scoping Study, which proposes a national online early intervention service to support young people concerned about their own or someone else's sexual thoughts or behaviours, as well as for parents, carers, and professionals who are worried about a young person's harmful sexual behaviour.

The proposal responds to growing concern among experts around problematic and harmful sexual behaviours among young people, and findings from the Australian Child Maltreatment Study that as it stands today, more children in Australia experience sexual abuse by another child than by an adult. Key features of the proposed service include an anonymous helpline and a dedicated website offering accessible resources and psychoeducation.

What's ok aligns with Stream 1 in its ability to engage at scale, but can also provide an entry point to more intensive and targeted support to young people and the adults who care for them. The What's ok? website will launch in early 2026 with philanthropic funding, but additional funding is required to establish the anonymous helpline.

A further challenge we face is growth in the complexity of the young people with whom we work, along with increased demand for our services – with funding not increasing to meet this demand. The nature of our participant cohort has changed in recent years: participants are more culturally diverse and face greater complexity of needs. Across some programs, this has led to changes in the work required to effectively meet the needs of participants, including working with a young person's family and community, supporting them to navigate multiple services and supporting them within their cultural context. These have become integral elements of many of our programs but are often not formally recognised or funded. We therefore strongly support a 'pay what it takes' approach to funding agreements.

Prioritising investment

Do you agree 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?

We support the four priorities, and offer the following comments.

Improving family wellbeing

Investing in early intervention to break cycles of disadvantage is critical, however we advocate for some of the 'Key interest areas' around this priority to be expanded.

Recommendation to expand 'Families at risk of child protection involvement'

We advocate for a focus on indicators of risk in addition to child protection involvement.

Children disengaging/disengaged from education

Children's disengagement from education, low educational attainment and challenging behaviours at school can be early manifestations of underlying challenges related to mental health, disability, neurodiversity or safety in the home environment. The link between

educational disengagement, poor learning outcomes, and contact with the criminal justice system is also well established.² Early intervention at this stage is essential to address these complex challenges.

Change Makers

Jesuit Social Services' Change Makers pilot program is working with boys and young men who are showing early signs of violence and misogyny or are exposed to risk factors that make them more likely to perpetrate violence, such as disengagement from education, exposure to family violence, and association with violent peers.

The program partners with mainstream and specialist secondary schools and community organisations to deliver a group-based program with young people, as well as capacity-building with staff to support them to work with young people to prevent violence.

Change Makers complements the Resilience, Rights and Respectful Relationships (RRRR) curriculum with a higher intensity intervention for young men and boys at greater risk of using violence, and those who are disengaged from school.

The Change Makers pilot is generating promising evaluation data which indicates that it is contributing to improvements in participants' emotional literacy, empathy for others, non-violent problem-solving skills and understanding of gender norms and societal pressures related to masculinity, as well as contributing to stronger social connections and behavioural changes for participants, such as improved attendance and behaviour at school and increased help-seeking.

Homework Club

Our Homework Club in Melbourne provides learning support for children and young people who live in and around the Flemington public housing estate, most of whom come from diverse cultural backgrounds. Homework Club offers a very low-cost early intervention model for children and young people from diverse cultural backgrounds to prevent disengagement from education. The program – which is supported primarily by volunteers and funded by philanthropy, with a contribution from local government – is currently at capacity with a waitlist. There is strong potential to replicate Homework Club in other locations.

Families with justice system contact

We also propose including as an interest area families where parents or children are in contact with the justice system. The younger a child is at the time of first contact with the justice system, the more likely they are to reoffend and ultimately become entrenched in the system.¹ Further, children whose parents are in prison experience multiple, sustained, and compounding disadvantage.²

¹ Australian Human Rights Commission (2024). Help way earlier!: How Australia can transform child justice to improve safety and wellbeing. Sydney: Australian Human Rights Commission, p 21–22.

² Flynn, C. and Gor, K. (2024) *Living with a parent in prison: Learning from young people*, Monash University, Melbourne, Australia. [[Weblink](#)]

Families where there is evidence of violence and abuse in the home

Evidence of violence and abuse in the home is a key opportunity to disrupt cycles of violence. A focus on this risk factor should include explicit recognition of the importance of working with children who are victim survivors of violence and abuse. While not every child who experiences violence will go on to perpetrate it, those who use violence have often been victims of it themselves during their childhood.³

Investing in healing and recovery from violence and abuse is critical to breaking cycles of harm. Most children and young people causing harm in their communities or involved with the criminal justice system have complex histories of disadvantage and trauma, and finding ways of healing this harm can play a role in preventing school disengagement, or ongoing/repeated contact with the youth justice system. Although they don't necessarily align with traditional prevention and early intervention models, we know alternative justice solutions should be pursued to support children on a path that keeps them, their families and their communities safe.

Restorative practice to address harm and address conflicts in communities

Restorative practice is a proven method for curtailing disengagement from school and reducing involvement with the youth justice system. It includes a variety of techniques that can be used to manage relations and address conflicts in communities. Jesuit Social Services delivers a range of restorative programs, including youth justice group conferencing, family group conferencing for adolescent family violence, and capability-building for schools to use restorative practice.

We are currently piloting the 'Re-Engage' program in schools in Merri-Bek, with funding from the Victorian Legal Services Board + Commissioner. Re-Engage seeks to build the capability of staff in more schools to use restorative approaches to manage conflict, reducing school disengagement and young people's contact with the justice system.

An earlier pilot in north-west Victoria (Engage) was shown to decrease disengagement from school (including reducing suspensions and exclusions) and to improve schools' capability to deal with conflict.⁴

Recommendation to expand 'Prevention and early intervention support for children aged 0-5 years'

While we recognise the importance of intervention in the early years, we call for a stronger focus on 6 to 16 year olds. As the discussion paper notes, middle childhood and adolescence are also crucial periods of development that offer opportunities to build strong cognitive, social and emotional foundations. Our experience with program delivery, including through Change Makers (see p.8), shows that for young people with adverse life experiences, developmental age can differ significantly from chronological age. The focus of early intervention efforts should be flexible, recognising that challenges such as mental ill health, neurodiversity, educational disengagement and behaviours that may lead to offending/contact with the justice system can be more strongly influenced by

³ An analysis of Jesuit Social Services' staff case notes from 2023-24 show that at least 74% of participants in our adult justice programs and at least 53% of participants in our youth justice programs reported being a victim survivor of family violence, with the vast majority of the reported experience occurring during childhood.

⁴ Victorian Department of Education & Training (2020). *Evaluation of Engage: Final report*. PhillipsKPA.

developmental trajectories than by age bracket. There is significant potential for programs to work in flexible and tailored ways during this life stage to:

- support the development of healthy relationships with family and community for young people with multiple and complex needs
- improve the lives of young people involved in the out-of-home care system
- maximise the independence and community participation of young people with a disability
- reduce the number of young people becoming homeless and/or involved in the justice system.

Connected, co-located and integrated services; responding to community need

For more than 25 years Jesuit Social Services has collaborated with researchers to examine complex disadvantage in communities around the country, releasing a series of reports known as Dropping Off the Edge (DOTE). These reports show clearly that complex and entrenched disadvantage is experienced by a small but persistent number of locations in each state and territory across Australia. The most recent report in 2021 highlighted how change that can be achieved when the inter-related factors causing disadvantage are understood, and when community-led solutions are properly resourced. The next edition of DOTE will be released in 2026, and we would be happy to keep DSS engaged as this work progresses, including its potential to inform where to focus efforts.

The redesigned FaCS program should provide organisations with the flexibility and resources to do genuine and effective community-based work, to innovate and build the evidence for place-based approaches. It takes time to build the trust of a community and secure genuine engagement that can inform the design and delivery of services. In many cases, only organisations that have been embedded in community for long periods are positioned to understand and respond effectively to community members' needs. This requires funding for community engagement work that isn't necessarily tied to specific outcomes or deliverables – and is often never funded at all.

Building on the strengths of Western Sydney communities

Jesuit Social Services has been working in Mount Druitt, Western Sydney, for 15 years, using a place-based, community development approach to support community members to develop local solutions to local problems. We have strong engagement with Aboriginal people, ACCOs and the wider community.

We currently support the community through community building initiatives, such as the Willmot Community Hub, and social enterprises centred around food security and ecological justice, like the Ignite Food Store. This work has been undertaken with only \$120,000 recurrent state government funding. Jesuit Social Services has been raising a further \$1.3 million each year from philanthropy and donations but this is becoming increasingly unsustainable. The time it takes to raise these funds would be better spent, as Minister Plibersek noted in her speech about the FaCS reforms, 'focused on supporting communities in meaningful ways'.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

We strongly support this priority, and advocate for ACCO partnering, support and strengthening work to be in scope for the program.

Accompanying communities in the Northern Territory

Jesuit Social Services has been working in the Northern Territory since 2007. We have provided capacity building support; developed and delivered restorative practice programs in youth justice; collaborated with other services and communities on climate justice; and supported workforce development through delivery of training to other community organisations, including ACCOs, in Alice Springs, Tennant Creek, Katherine and Darwin.

Our work began when we were invited to collaborate with the Eastern and Central Arrernte people to establish a sustainable governance process for people residing in the remote community of Ltyente Apurte (Santa Teresa). ACCOs and other groups from remote communities have since approached our organisation seeking assistance.

This partnering work has been made possible in large part due to philanthropic support from funding partners who supported this vision, but has never received government funding.

Our work in the Northern Territory highlights the need many smaller or emerging ACCOs have, aligned with Closing the Gap Priority Reform 2, for partnership as they progress towards self-determination – to enhance their leadership, workforce and infrastructure to lead responses tailored to local need, and to build their capacity to support strengthened culture, community connections and cohesion.

First Nations Self-determination and Strengthening Fund

Jesuit Social Services recommends the establishment of a First Nations Self-determination and Strengthening Fund. The fund should enable smaller or emerging ACCOs working on challenges faced by their communities to secure funding to engage a trusted and more established non-government organisation of their choosing (ACCO or mainstream) to work in partnership, strengthening their capacity to design, lead, deliver and govern services and programs that meet the needs of communities.

The fund should be available to eligible First Nations organisations, who can apply for funding to engage a partner organisation of their choosing in support of a specific project or purpose. The fund should allow for work to be undertaken in relation to building the conditions for self determination; supporting the establishment of programs and services; strengthening service delivery; and specific projects, including program evaluations.

Measuring outcomes

What kinds of data would help your organisation better understand its impact and continuously improve its service? 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? What kinds of templates or guidance would help you prepare strong case studies that show the impact of your service?

We advocate minimum standards for reporting, ideally aligned with other Commonwealth agency reporting requirements, with ample flexibility including mixed method data collection and reporting. We support the Strengthening Communities Alliance and Targeting Possibility Partnership in calling for qualitative and relational outcomes (e.g. trust, safety, participation) alongside quantitative metrics. Metrics should be locally and culturally appropriate without adding unnecessary burden or complexity to the reporting process.

When it comes to measuring outcomes, many service providers are unable to access the kinds of administrative data held by government that provides evidence of medium- to long-term behavioural and other changes. DSS should explore how to make government data relating to key outcomes of interest available to service providers, to support more rigorous evaluation efforts and guide adaptations to program design. This includes data held by state and territory agencies across child protection, justice and education. It should also consider data to measure community strength and cohesion.

Another challenge is the lack of consistent or comparable data sources for key outcome areas to enable comparisons over time, or between similar cohorts. For example, beyond NAPLAN and the Australian Early Development Census (completed only every three years), there are no consistent data sets in relation to children's school readiness or school performance, to guide early intervention initiatives. DSS could lead a process to consider what other indicators would enable assessment of the need for, or impact of, early intervention efforts, and what additional testing or assessment would need to be gathered to support such efforts.

Finally, the standard of evidence underpinning prevention and early intervention programs remains uneven, with limited programs subject to strong experimental or longitudinal evaluation. As part of these reforms to commissioning, DSS should explore ways to strengthen the evidence base by expanding the use of rigorous evaluation methods, including experimental designs (such as randomised controlled trials) and longitudinal studies capable of demonstrating causal impact and sustained behavioural change. This could identify effective practice, drawing on lessons from rigorously evaluated international prevention and early intervention initiatives. Investment in rigorous evaluation is necessary to inform policy and funding decisions, and guide the expansion of prevention and early intervention programs.

Working together

What does a relational contracting approach mean to you in practice? What criteria would you like to see included in a relational contract? Is your organisation interested in a relational contracting approach?

We support the intent and principles of relational contracting, including shared goals and guiding principles agreed by parties, and processes for open communication and data sharing. We also support a strong focus on outcomes, and contracting relationships based on trust and commitment over a significant period (minimum funding cycles of five years – ideally 10 years).

However, new contracting approaches should beware of unintended consequences, such as losing the expertise of on the ground service delivery, traded off against efficiencies of larger providers with a broader range of services. The reforms should consider the capacity of small and medium services (mainstream and ACCO) to adapt to changes – including specific supports some may require – and resource the adaptation and capacity building.

The community sector needs to be better equipped to provide flexible, locally configured services that are not constrained by rigid contracts and system silos. If there's a genuine commitment to this, it should be factored into funding agreements. For example, services should have the flexibility to respond to emerging needs through employing a range of workers with the skills that enable holistic support (recognising, for example, that a housing worker can't do AOD work etc).

Practically, contract managers should be available for discussion when issues or concerns arise. The relationship between contract managers and services providers should be grounded in trust and agreed mutual aims, rather than an emphasis on compliance and oversight. Regular, two-way information sharing may involve the service provider raising themes and issues arising in communities or with participants, or barriers to effective program delivery; in turn, the contract manager may share information related to emerging data, evidence of best practice and learnings from other providers. Agreements that are not too closely prescribed have resulted, in our experience, in joint problem solving that leads to more positive outcomes for participants.

Below is an example of an innovative program which, enabled by flexible funding agreements, is helping to support healthy and resilient children, despite working outside of a traditional early intervention paradigm.

Flexible service delivery through the African Visitation and Mentoring Program

The African Visitation and Mentoring Program (AVAMP) matches people from African backgrounds who are incarcerated with trained and carefully selected community-based volunteer mentors. Mentors visit participants in prison where they develop positive relationships to assist their transition back to the community. Mentors work closely with qualified case managers who provide ongoing case management, practical and emotional support to assist participants to re-engage with positive relationships and services that will promote their successful transition out of the justice system.

Funded by Corrections Victoria, AVAMP offers an innovative early intervention model. Although the program works with adults already in contact with the justice system, case managers have consent from participants currently incarcerated to provide practical support to their families and children in the community. Many children are in kinship placements with their grandmothers who face several challenges, and the program provides support across a range of areas, including food, health care, school enrolment and engagement, advocacy and housing sustainability.

AVAMP recognises the impact parental incarceration can have on children, and provides an early intervention response that is culturally informed, focussing on protective factors that can divert children from the justice system. The flexible contracting approach enables stronger outcomes across family connection, restoration and healing, meaning AVAMP plays a pivotal role keeping incarcerated people connected to their families, enabling both a smoother transition from custody back to the family home, as well as contributing to improved outcomes for children.

Other comments

We call on DSS to consider how fragmentation and lack of coordination across health, education and social services – and child protection and youth justice systems – means children fall between gaps in portfolios and jurisdictions. Currently, for example, punitive

youth justice policies in multiple jurisdictions are operating to entrench cycles incarceration and disadvantage; and inadequate integration between family services and child protection pose a barrier to long term and consistent relational support.

Federal leadership mechanisms in relation to children's wellbeing could operate to set minimum standards and apply oversight and accountability across a range of portfolios and systems, so that services can work in harmony with, rather than in spite of, other systems that should be preventing childhood trauma and/or responding effectively to it. This would include, but not be limited to:

- children in the criminal justice system
- child sexual abuse prevention
- children who require support for disabilities, including through the National Disability Insurance Scheme (NDIS)
- healing and recovery for children and young people who are victim-survivors of violence, and who in some cases may also be at risk of perpetrating violence (including opportunities for earlier intervention)
- the unique issues faced by children from migrant or refugee backgrounds settling in Australia.

Specifically as part of these reforms, DSS should encourage formal agreements with state and territory agencies and support joined up delivery across federal and state/territory services.