



NATIONAL ALLIANCE OF DFV SPECIALIST SERVICES

A new approach to programs for families
and children submission

5 December 2025

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About NADFVSS

The National Alliance of Domestic and Family Violence Specialist Services (the DFV Alliance) represents the interests of specialist domestic and family violence (DFV) services across all jurisdictions in Australia.

The DFV Alliance includes funded and non-funded formal peak entities, representative networks, and service providers in an informal representative function.

The DFV Alliance seeks to improve outcomes for people experiencing or at risk of domestic or family violence through promoting the unique value of and increasing access to specialist service supports.

For more information, please visit: <https://wesnet.org.au/NADFVSS>

Introduction

The National Alliance for Domestic and Family Violence Specialist Services (NADFVSS) welcomes the opportunity to provide a submission on *a new approach to programs for families and children*. This submission has been prepared on behalf of, and in consultation with, the NADFVSS membership and represents the collective position and expertise of specialist DFV services from every state and territory in Australia.

In principle, the NADFVSS supports a new program approach and funding structure that reduces the administrative burden on community service providers. We are acutely aware of the growing capacity pressure being experienced by our sector, and streamlined and simplified reporting has the potential to significantly relieve some of the unnecessary and time-consuming work associated with funding applications and acquittals. We are also strongly supportive of efforts to embed Priority Reform Two of the National Agreement on Closing the Gap and to ensure true accountability to Aboriginal communities.

It is our position, however, that there are issues with both the current structure of the program, as well as the proposed changes under consultation, that require further and more in-depth consultation than is currently facilitated by this process, as listed in the first section of this submission.

This submission firstly outlines (a) our high-level concerns about the review, and (b) then addresses some of the questions outlined in the Department's discussion paper.

Part A. Higher-level concerns about the review

The concerns we raise need to be understood in a broader context.

Merging the existing SFVS program into a generic third stream has some serious downsides. Some NADFVSS members suggest that the existing SFVS program should be excluded from the merging and treated separately. That said, we also have significant concerns about the operational guidance for the SFVS program if it were to continue in its current form.

We also recognise that services for children and families experiencing family violence differ significantly between First Nation and non-First Nations communities. The current new approach makes responding to this submission multi-dimensional.

Two principles which we promote but may appear contradictory to some readers are that we simultaneously advocate for:

- (1) place-based, ACCO-led and controlled service delivery for Aboriginal communities,
- (2) a specialist DFV lens on services for children and families that are experiencing family violence.

It may be helpful to readers of this submission to assume that where we are discussing specialist DFV practice and service delivery, we are referring to non-First Nations children and families.

In all cases, however, we also advocate for community-led, place-based approaches grounded in good practice.

1. The new approach is more about reducing red tape than service outcomes.

Reducing red tape and repetitive reporting for community grants is welcome; however, not at the expense of client outcomes. We will outline some concerns about good practice in working with children and families affected by family violence. Our main concern is the proposal to amalgamate five programs into one. We worry this could lead to a loss of specialist knowledge and expertise. While it may reduce administrative burden, it often comes at the expense of person-centred, high-quality service delivery.

2. Specialist domestic and family violence lens (principles, frameworks and best practice) needs to be applied across all of the activities of the program.

Any adjustments to the FACS Program (and encompassed SFVS) should require grant recipients to have expertise in working safely with victim-survivors of family violence. We hold concerns that in the proposed restructure into three streams, domestic and family violence (DFV) practice is currently ill-defined, and that without proper consideration, the proposed new approach may in fact dilute and obfuscate the critical importance of good practice DFV frameworks and practice. It is imperative that the specialist DFV sector be consulted in the design, guidance, and implementation of any program that seeks to strengthen and support children and families. We know that children and young people experience domestic and family violence at alarming rates across Australia, and that they have a right to be heard, believed and to access services that provide safe, tailored and culturally responsive support.

Where there are non-specialist DFV services¹ (or “mainstream services”) delivering DFV and any family support services, they need to be held accountable for delivering DFV-informed and appropriate practice. It is not safe to do this kind of work without an explicit focus on victim-survivor safety, keeping the perpetrator in view and ensuring that children are understood as survivors in their own right. To fail to do so is unsafe and risks collusion with perpetrators, placing children and adult survivors at greater risk of harm.

3. Aboriginal Peoples’ inherent right of self-determination must be explicitly upheld in the tendering process, program design, implementation, monitoring and evaluation. Building the ACCO sector is a priority under Closing the Gap Priority Reform 2 pillar and must be respected.

The Department must work in genuine and dedicated partnership with Aboriginal grassroots communities and organisations to further consult on this new approach, and the design and implementation of programs and funding models must be culturally responsive to their needs and context.

The NADFVSS endorse and refers the department to the submission on this issue made by FNAAFV.

¹ DFV Specialist Services is poorly understood in Australia. For non-first nations services, we define a specialist DFV service as one that has a primary purpose supporting survivors of DFV, is secular and/or underpinned by intersectional feminism, and is government-funded and is staffed by professionally qualified staff.

4. An explicit connection must be drawn between the relevant National frameworks and the vision, outcomes and design of the 'new approach'

It is vital that federally funded programs such as the Families and Children (FaC) Activity avoid reinforcing siloed service delivery in our communities, particularly at the proposed Stream 3: Intensive family supports level. As such, there is a need to more explicitly link and connect the vision, outcomes and guidance associated with funded programs to National frameworks and agreements that all articulate a commitment to ensuring that we urgently work to develop coordinated and effective responses to DFV for everyone, including and particularly for Aboriginal communities and children and young people. This is fully in alignment with the Australian Government's Community Sector Grants Engagement Framework which states: "Grants are intended to contribute to one or more government policy and program outcomes and support an individual or organisation to achieve its objectives."²

The new approach for Stream 3 doesn't appear to have any discernible links / integration with existing national strategies to address the key vulnerable populations.

- National Plan to End Violence Against Women and Children 2022-2032,
- National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030,
- Safe and Supported: the National Framework for Protecting Australia's Children 2021-2031,
- National Agreement on Closing the Gap,
- Productivity Commission Report on Closing the Gap
- National Aboriginal and Torres Strait Islander Early Childhood Strategy.
- Rapid review of Prevention Approaches
- Murdered and missing women

We also note that despite being a long-standing program, established more than 10 years ago and then significantly expanded under the fourth action plan, the existing SFVS program doesn't appear to integrate with existing State/Territory programs. In particular, there is confusion about how this program interacts with State/Territory-funded domestic and family violence programs. This appears to be due to the selective tender processes, which have prevented any specialist domestic and family violence services from tendering for the SFVS program.

The Department must work towards ethical tendering and accountability in funding across partnerships.

The NADFVSS recommend consideration and development of mechanisms to ensure accountability for assessing genuine partnership as a means of working to ensure ethical and equitable tendering. We are acutely aware of the inherent power imbalance that is replicated in joint tendering between large generalist service providers (which often take on the role of lead agency) and smaller grassroots services. It is incumbent on the Department to work to ensure that the tendering and funding process supports healthy partnerships, and ethical throughput of funds, and that roles and accountabilities are set at the outset.

² P.3 <https://www.dss.gov.au/system/files/documents/2025-02/community-sector-grants-engagement-final.pdf>

This could be assisted by ensuring all NGO applicants for future tendering follow the ACOSS Principles for a Partnership Centred Approach.

Part B. Response to DSS Discussion Paper Questions

Vision and outcomes

The current vision and outcomes clearly prioritise the needs of parents, care givers and children, however we believe that a meaningful articulation of these foundational aspects of the program should:

- more strongly reflect and embed accountability to Aboriginal communities, and their right to culturally responsive and led services (as recommended by FNAAV submission)
- Be clear that safe and meaningful work with children and families requires a strong family violence lens to be embedded in all program and service delivery design. This ensures that:
 - **Victim-survivor safety:** Risk of harm to all victim-survivors including and especially children is identified and addressed
 - **Accountability for people using violence:** There is awareness that use of violence is a parenting choice and a commitment to hold people and parents who use violence to account.
 - **Resisting collusion and systemic violence:** Practitioners, programs and systems avoid colluding with the unsafe parent/caregiver and exacerbating the risk of violence and harm being caused to the safe parent and children.

Proposed funding structure

As previously noted, we support the principles that guide the reduction in administrative burden and red tape associated with tendering and funding acquittal. We also recognise that the proposal of this new approach aligns with the Community Sector Grants Engagement Framework, which seeks to strengthen the government's relationship with "the community services sector (the sector) by providing grant settings that are designed to better serve the sustainability of the sector"³, and this is vital work.

We do, however, hold concerns that this new approach to the funding structure may have unintended consequences. The first of these is that there will be further dilution and undermining of specialist DFV practice as a result of the condensed funding streams and absorption of the current Specialised Family Violence Services (SFVS) activity under the Family and Children Services (FaCS) program into the proposed three-stream structure.

³ Community Sector Grants Engagement Framework (2025Department's responsibility to ensure whichthat)
<https://www.dss.gov.au/system/files/documents/2025-02/community-sector-grants-engagement-final.pdf>, p.1

This outcome will exacerbate the existing lack of appropriate specialist family violence language and frameworks in the existing Families and Children Activity Family and Relationship Services - Specialised Family Violence Services Operational Guidelines.⁴ It is the position of the NADSVSS that a specialist DFV lens must be applied across all funded activities so as to ensure that victim survivor safety, perpetrator accountability, child-centred practice are kept in focus in all work with children and families. Safeguards to ensure specialist DFSV ACCO's are priority, not diluted within a consolidated framework of nonspecialist DFSV ACCO's or mainstream DFV services. There are relevant DFV practice standards in many states and territories and there are calls for the development of National ACCO and non-ACCO specialist DFV standards.

We also wish to highlight concerns held collectively by the NADSVSS that by condensing the current SFVS funding activity into the broader generalised funding streams, it may have the adverse effect of disadvantaging small, grassroots specialist DFV services when in competition with larger generalist organisations that have greater capacity and a broader range of service models available. These small organisations are most likely to be grassroots and place-based services, some of which deliver highly specialist services to particular community groups such as culturally and linguistically diverse communities, the LGBTIQ+SB community and for people with a disability. It is imperative that these organisations are not disadvantaged by the new approach under consultation, and it is the responsibility of the Department to ensure that they are adequately and sustainably resourced.

Prioritising investment

NADSVSS strongly supports the position outlined by Safe and Equal: *We are broadly supportive of these investment priorities. However, an additional priority that explicitly focuses on family violence, and SFVS principles including victim survivor safety, perpetrator accountability, child-centred practice and Aboriginal self-determination is needed.*

Improving family wellbeing

As noted above, it is imperative that the specialist DFV lens is faithfully and accurately carried through in the design, guidance and implementation of any program that works to strengthen and support children and families. Failure to ensure good family violence practice in work with families, (in particular focus on victim-survivor safety, perpetrator accountability and a dedicated focus on children and survivors in their own right), risks collusive practice with unsafe parents/caregivers and people using violence, and placing survivors at further risk of harm. We refer particularly to the existing Family and Relationship Services Specialised Family Violence Services Operational Guidelines (2021). We note a lack of specialist family violence practice guidance and requirement to align with best practice or dedicated DFV outcomes in the guidelines for this program. Further, the NADSVSS feel it

⁴ Families and Children Activity Family and Relationship Services - Specialised Family Violence Services Operational Guidelines (2021)
<https://www.dss.gov.au/system/files/resources/draft-fac-specialised-family-violence-services-operational-guidelines.pdf>

would be beneficial to understand whether evidence is available in relation to the service design, practice principles and frameworks being used by currently funded SFVS.

Connected, co-located and integrated services

Many members of the NADSVSS note that there is a lack of connection or integration with the wider DFV service system in most jurisdictions, with the Northern Territory being the exception. There also appears to be a lack of guidance or specific requirements on service system integration (with the wider specialist DFV system), and further a lack of evidence on whether and how this integration is happening on the ground.

The NADSVSS consider that SFVS-funded services would benefit from increased connection and integration with the wider DFV service system to ensure focus on victim-survivor safety, keeping the perpetrator in view and that children are understood as survivors in their own right. NADSVSS recommend guidance and support by DSS to facilitate service system integration with the wider specialist-DFV system funded by State-Territory governments.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

The NADSVSS strongly advocates that the Department funds Aboriginal Community Controlled Organisations (ACCOs) to do the work where possible, and that efforts are made to transition from generalist service providers to community-led service delivery as soon as possible. Additionally, the tendering and funding process must protect and promote self-determination and culturally appropriate and responsive practice. We recommend DSS effectively partner and consult with ACCOs to develop this capacity and funding as per the commitments in the *Community Sector Grants Engagement Framework*.

The Department also has a responsibility to support safe and healthy partnerships. As mentioned above, in scenarios where large generalist organisations seek to partner with ACCOs, it is incumbent on both the Department and the larger services involved to actively mitigate power imbalances and extractive practices in the context of tendering and partnership. ACCOs must be supported to design and deliver programs alongside their own communities.

Measuring outcomes

The NADSVSS is concerned about the lack of rigorous evaluation of the outcomes of the existing program. Noting that the Evidence Summary document makes one reference to the word violence and largely focuses on issues relevant to Streams 1 and 2.

In order to make informed decisions and effectively plan for the future of the programs funded for children and families by the Department, we need rigorous evaluation of the current suite of services and programs. We note the National survey of FaRS-funded

service providers⁵ in 2018 offered a broad perspective on the nature of characteristics and activities of Family and Relationship Services (FaRS) and Specialised Family Violence Services (SFVS). We advocate that there is an immediate priority placed on conducting new research which focuses specifically on practice approaches, system integration and collaboration, and importantly program outcomes, that would support a more in-depth understanding of the funded programs.

National Alliance of DFV Specialist Services
5 December 2025

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⁵ Harvey, J. & Muir, S. (2018). National survey of FaRS-funded service providers. (Research Report). Melbourne: Australian Institute of Family Studies.