

SUBMISSION TO THE FAMILIES AND CHILDREN ACTIVITY REVIEW

December 2025

Contents

Acknowledgment.....	3
About SNAICC.....	3
Introduction.....	4
Recommendations to DSS.....	6
Response to Discussion Paper questions	9
Vision and outcomes	9
Program structure	11
Prioritising investment.....	12
Improving family wellbeing	13
Connected, co-located, and integrated services	16
Responding to community need.....	18
Improving outcomes for Aboriginal and Torres Strait Islander children and families	20
Measuring outcomes	24
Working together	28

Acknowledgment

SNAICC shows respect by acknowledging the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities.

SNAICC pays respects to Elders past and present and we acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted.

SNAICC's head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally.

About SNAICC

SNAICC is the national non-government peak body for Aboriginal and Torres Strait Islander children. Our work is concentrated on the fulfilment of the rights of our children, to ensure their safety, development, and well-being. At the heart of SNAICC's work is championing the principles of community control and self-determination as the means for sustained improvements for children and families – whether in child protection and wellbeing or early childhood education and development.

SNAICC has a dynamic membership of Aboriginal and Torres Strait Islander community-based child care agencies, Multi-functional Aboriginal Children's Services, crèches, long day care child care services, pre-schools, early childhood education services, early childhood support organisations, family support services, foster care agencies, family reunification services, family group homes, services for young people at risk, community groups and voluntary associations, government agencies and individual supporters. As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences, needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations.

SNAICC's work in the Child and Family Wellbeing sector is critical in transforming Australia's systems to better foster strong, healthy, thriving Aboriginal and Torres Strait Islander children who are connected to family and culture and part of self-determining communities. We also endorse the importance of family, community, culture and country in child and family welfare policy, legislation and practice. Our work comprises policy, advocacy, and sector development. We work with non-Indigenous services alongside Federal, State and Territory Governments to improve how agencies design and deliver supports and services for Aboriginal and Torres Strait Islander children and families.

“It has long been acknowledged by academics, governments, the sector and most importantly, Aboriginal and Torres Strait Islander people, that ACCOs are best placed to deliver health and social services to Aboriginal and Torres Strait Islander people. Since the early 1970s, ACCOs have been providing culturally appropriate and holistic children and family services and continue to respond to the impacts of Stolen Generations and preventing ongoing child protection intervention. ACCOs not only deliver services but also play an essential role in advocacy, as employers of Aboriginal and Torres Strait Islander people and are an important mechanism for self-determination through community-control of services and service delivery.”¹

Introduction

Aboriginal and Torres Strait Islander children remain significantly over-represented in child protection, out-of-home care systems and youth justice systems. In 2023-24, Aboriginal and Torres Strait Islander children were:

- 4.9 times more likely than non-Indigenous children to be reported to child protection authorities (i.e. subject to a notification)
- 5.5 times more likely to have notifications investigated
- 6.4 times more likely to have notifications substantiated
- 9.8 times more likely to be subject to a care and protection order
- 9.6 times more likely to be in OOHC and on third-party parental responsibility orders² (TPPROs)
- 27 times more likely to be incarcerated.

This situation is a legacy of the ongoing impacts of colonisation, racism, systemic inequality and intergenerational trauma. The reform of Families and Children Activity (FaC) offers a critical opportunity close the gap and to move away from crisis-driven interventions and toward early, culturally grounded, community-led supports that empower families from conception to young adulthood.

ACCOs are best placed to improve outcomes for our children and families

Aboriginal and Torres Strait Islander community-controlled organisations (ACCOs) represent the gold standard in multi-function service delivery to our communities. ACCOs are best placed to improve outcomes for Aboriginal and Torres Strait Islander children and families, by delivering community-led, culturally safe child and family services. This is recognised across key national agreements and strategies, including the *Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan (Action Plan)* and the recently endorsed *National Child and Family Investment Strategy (NCFIS)*. In contrast, mainstream systems – shaped by non-Indigenous frameworks and assumptions – have consistently failed to meet the needs of Aboriginal and Torres Strait Islander

¹ SNAICC (2023) *Stronger ACCOs, Stronger Families*, p18

² Steering Committee for the Review of Government Services Provision (SCRGSP) (2025) *Report on Government Services 2025*, Part F Section 16 Child protection Services, Productivity Commission, Australian Government, Tables 16A.1 and 16A.42; Australian Institute of Health and Welfare (AIHW) (2025) *Child Protection Australia 2023–24- Data tables: Child protection Australia* AIHW 2025, Table T3.

children and families.³ Despite this reality, ACCOs continue to receive only a small proportion of direct FaC funding (just 2% according to DSS).

Reform of the Families and Children (FaC) Activity is an opportunity to shift this imbalance and strengthen outcomes by growing ACCO leadership, expanding early supports, and transitioning resources and funding to the ACCO sector, in line with the system elements outlined in the NCFIS.

With the right investment, ACCOs are ready to take on this challenge

Claims that ACCOs are “not ready” overlook the reality that historic underfunding, competitive grant processes and systemic bias – not capability – have constrained their growth. Despite these obstacles, ACCOs have repeatedly demonstrated their sustained viability. This is due to their inherent strength as community-placed, governed and staffed organisations. Where governments have invested in culturally grounded workforce initiatives, community governance, scaffolding by established ACCOs and dedicated backbone structures (such as SNAICC’s Early Years Support model) services have demonstrated strong growth in quality, participation and community trust.

To shift from crisis-driven systems to early, community-led supports, FaC reform must substantially increase dedicated ACCO funding and ensure ACCOs are positioned as preferred providers, supported by long-term, secure and proportionate investment responsive to the needs of communities. As noted by Dr Paul Gray at the recent DSS-led consultation on the FaC, ‘Our communities should have confidence of funding even beyond 5 years, because it’s about enabling self-governance, not delivering Commonwealth services.’

New FaC funding arrangements must directly address the longstanding underfunding and structural biases experienced by ACCOs. This means ensuring funding levels reflect the true cost of delivering culturally safe, holistic services, and actively supporting models such as SNAICC’s Nest and Nurture and Early Years Support that scaffold and scale historically isolated and marginalised ACCOs. Achieving this shift requires more than revised guidelines – it requires DSS to build its capacity to work in fundamentally different ways with the ACCO sector. Funding allocation and contractual requirements must be shaped through genuine shared decision-making and self-determined approaches that draw on cultural authority and local knowledge to respond to community need.

Genuine partnership and shared-decision making are critical

While SNAICC welcomes DSS’s commitment to longer-term, flexible funding and prioritising ACCO-led delivery, these reforms cannot succeed without genuine shared decision-making. When governments redesign systems or allocate funding without community and sector leadership, they risk repeating past patterns and mistakes, where programs reflect government assumptions rather than what communities know works. Shared decision-making is essential to ensuring reforms are

³ As noted by Dr Paul Gray at the recent DSS-led consultation on the FaC (28 November 2025): ‘Often, “Mainstream” means systems and programs built on non-Indigenous conceptual frameworks and ideas. In my view, these programs underperform and underdeliver for our communities.’

informed by lived experience, cultural expertise and evidence from ACCOs, leading to more effective investment decisions and stronger outcomes for children and families.

This submission makes 22 recommendations which seek to ensure that these reforms are successful in delivering better outcomes for Aboriginal and Torres Strait Islander children.

By grounding the reforms in the knowledge and strengths of communities and their organisations, the FaC has its first real opportunity to deliver services that genuinely meet the needs of, and improve outcomes for, Aboriginal and Torres Strait Islander children and families.

Recommendations to DSS

FaC visions and outcomes

1. Include a standalone dedicated vision for Aboriginal and Torres Strait Islander children and families, recognising their:
 - a. distinct experiences shaped by history, community and identity
 - b. right to grow up safe, connected and supported in their family, community and culture by self-determined services
 - c. wellbeing is inseparable from cultural connection, identity, kinship networks, connection to Country, and the strength of Aboriginal community-controlled systems.
2. Include standalone dedicated outcomes for Aboriginal and Torres Strait Islander children and families, recognising their unique cultural rights and experiences shaped by history, community and identity.
3. The FaC outcomes, as proposed in the Discussion Paper, should be updated to mirror the nationally agreed 10-year family and system level outcomes set out in the Aboriginal and Torres Strait Islander Outcomes Framework and Theory of Change in the *Safe and Supported Aboriginal and Torres Strait Islander First Action Plan*.
4. Design the dedicated vision and outcomes through a shared decision-making process, in partnership with Aboriginal and Torres Strait Islander representatives through shared decision-making mechanisms such as the Safe and Supported Aboriginal and Torres Strait Islander Leadership Group.

Prioritising Investment

5. Priority area “Ensure services are informed by, and respond to, community needs” should be expanded to acknowledge that in the case of Aboriginal and Torres Strait Islander communities ACCOs are best placed to collaboratively identify and respond to local needs through community-led design and ACCO leadership and governance.
6. ACCOs should be made the preferred providers for *all* children and family services delivered to Aboriginal children and families under FaC.

Improving family wellbeing

7. SNAICC recommends that the Government ensures that the focus area “Families at risk of child protection involvement” includes:
 - a. families who have had contact with child protection and remain at risk of future contact if the family remains unsupported
 - b. families who have had children removed (and or reunified) who remain at risk of further children protection involvement.
 - c. grandparents and kin who carry cultural child-rearing responsibilities
 - d. families experiencing multiple forms of disadvantage, who may not be at immediate risk of child protection involvement, but may face that risk if they remain unsupported
 - e. families who avoid services due to fear of child protection involvement
8. Expand the focus area “Young parents aged under 25” to include people under 25 who are pregnant and at risk of pre-birth child protection involvement
9. Add new focus area: *Families with children in contact with or at risk of contact with the youth justice system*

Connected, co-located, and integrated services

10. DSS should require that funded services demonstrate genuine integration driven by community authority rather than just physical co-location.
11. Applicants should be required to clearly demonstrate that they are embedded in, trusted by and accountable to the community they serve.
12. Assessment criteria should focus on the capability to deliver culturally safe, community-driven, holistic support models that achieve long-term wellbeing outcomes.

Responding to community need

13. To ensure funding reflects the needs of communities, consider federal data sets alongside locally held community knowledge.
14. To ensure funding meets the needs of communities, funding applications and funding arrangements for the delivery of services to Aboriginal and Torres Strait Islander people must demonstrate: community-led needs assessments, Aboriginal and Torres Strait Islander leadership in design and governance, embedded cultural healing practices, use of community-defined data, and adherence to Indigenous Data Sovereignty principles.
15. Grant applications, made by mainstream organisation for the delivery of services to Aboriginal and Torres Strait Islander people under FaC, should also show genuine accountability to ACCOs through formal partnerships, measurable transition of services and supports, alignment with local community-controlled governance, evidence of community trust, and demonstrated cultural safety in service delivery.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

16. To increase the number of ACCOs delivering services to children and families:
 - a. Allocate long-term, core operational funding to ACCOs, ensure funding reflects the full cost of culturally safe service delivery, and support models like SNAICC’s

‘Nest and Nurture’ and proven Early Years Support Model to scaffold and scale ACCOs.

- b. Include community representation on funding panels and develop commissioning policies that give Aboriginal-led governance a central role in funding allocation.
- c. Require mainstream applicants to demonstrate genuine partnership with ACCOs and provide ACCOs the opportunity to lead partnerships to address power imbalances.
- d. Ensure evidence-informed funding requirements value Aboriginal and Torres Strait Islander knowledge, lived experience, and holistic approaches to child and family wellbeing, supported by emerging tools such as the forthcoming Evidence Guidance Framework.

Data and reporting

17. In the short term, ensure data collected under DEX aligns with:

- a. community priorities and Aboriginal-led practice, consistent with Priority Reforms 1, 2 and 4 of the National Agreement on Closing the Gap.
- b. available evidence on the characteristics of programs or services that improve Aboriginal and Torres Strait Islander child and family wellbeing
- c. the Maiam Nayri Wingara principles of Indigenous Data Sovereignty with regards to its collection, storage, dissemination and use.

18. In the longer term, partner with Peaks and ACCOs to design an outcomes measurement framework that is a culturally responsive and an appropriate alternative to current reporting via DEX – and reduces funding reporting and administration requirements.

Working together

19. Develop relational contracting guidelines to ensure that contracting processes are:

- a. non-competitive
- b. provide sustainable funding for ACCOs
- c. flexible and considerate of the strengths and needs of ACCOs (including scaling up footprint, workforce development and transition).

20. Develop Aboriginal and Torres Strait Islander-led commissioning processes to oversee commissioning of child and family services, in line with Action 2.e of the *Safe and Supported Aboriginal and Torres Strait Islander First Action Plan*.

Response to Discussion Paper questions

Vision and outcomes

Outcome 1: Parents and caregivers are empowered to raise healthy, resilient children.

Outcome 2: Children are supported to grow into healthy, resilient adults.

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? Why/why not?

Vision

The *Safe and Supported Aboriginal and Torres Strait Islander First Action Plan* makes clear that Aboriginal and Torres Strait Islander children experience a different starting point to non-Indigenous children due to the ongoing effects of colonisation, intergenerational trauma, government policies and the dominance of non-Indigenous systems in child and family services.⁴ This includes the reality that many Aboriginal and Torres Strait Islander children and families avoid mainstream services because they feel unsafe, judged or misunderstood.

While it is acknowledged that the FaC is a mainstream program, to be effective, FaC's vision – and the elements of the program that underpins it – must recognise that achieving improved outcomes for Aboriginal and Torres Strait Islander children requires different pathways and approaches. These approaches must be capable of addressing the ongoing impacts of colonisation, racism and intergenerational trauma, while upholding the distinct human rights of Aboriginal and Torres Strait Islander children and families, enshrined in existing national commitments.

This vision should:

- recognise that Aboriginal and Torres Strait Islander 'wellbeing is inseparable from cultural connection, identity, kinship networks, connection to Country, and the strength of Aboriginal community-controlled systems.'⁵
- encompass that our children and young people have the right to grow up safe, connected and supported in their family, community and culture by self-determined services.
- be aligned with the Vision outlined in the *Safe and Supported Aboriginal and Torres Strait Islander Outcomes Framework* which states: "Aboriginal and Torres Strait Islander children and young people grow up safe and supported in their family, community and culture."⁶

Recommendation:

1. Include a standalone dedicated vision for Aboriginal and Torres Strait Islander children and families, recognising their:
 - a. distinct experiences shaped by history, community and identity
 - b. right to grow up safe, connected and supported in their family, community and culture by self-determined services

⁴ Ibid.

⁵ SAFeST Start Coalition (2035), *Draft Submission to the Families and Children Activity Review*, p 2.

⁶ Department of Social Services (DSS) (2023) *Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan 2023-2026*. Canberra: Department of Social Services, Australian Government. p 18.

- c. wellbeing is inseparable from cultural connection, identity, kinship networks, connection to Country, and the strength of Aboriginal community-controlled systems.

Outcomes

As noted above, Aboriginal and Torres Strait Islander children and families require bespoke pathways and approaches due to the ongoing effects of racism, colonisation and intergenerational trauma⁷. While prioritising an increase in the number of ACCOs delivering supports is positive, the two proposed outcomes are insufficient to drive the change required for Aboriginal and Torres Strait Islander children.

Recognising this, the Aboriginal and Torres Strait Islander Outcomes Framework and Theory of Change in the *Safe and Supported Aboriginal and Torres Strait Islander First Action Plan* – endorsed by the Commonwealth– sets out “10-year family and system level outcomes” required to achieve Safe and Supported’s vision.

These system level outcomes are:

- SFN1(b) High-quality child and family wellbeing services are designed and delivered by ACCOs to Aboriginal and Torres Strait Islander children, young people and families, in line with families’ needs, and focus on supporting families to stay safe together.
- SFN2(b) Systems and services uphold children’s and young people’s rights to their Aboriginal and Torres Strait Islander identities and the wellbeing needs arising from those identities, including self-determination and connection to family, community, Country and culture.
- SFN3(b) ACCOs and community leadership have authority in system design and child protection processes. Aboriginal and Torres Strait Islander knowledge and evidence drives best practice.
- SFN4(b) The design, implementation and evaluation of all aspects of child protection systems are continuously overseen by robust Aboriginal and Torres Strait Islander-designed governance and accountability mechanisms, with governments held genuinely accountable to progress against their commitments.

Recommendations:

2. Include standalone dedicated outcomes for Aboriginal and Torres Strait Islander children and families, recognising their unique cultural rights and experiences shaped by history, community and identity.
3. The FaC outcomes, as proposed in the Discussion Paper, should be updated to mirror the nationally agreed 10-year family and system level outcomes set out in the Aboriginal and Torres Strait Islander Outcomes Framework and Theory of Change in the *Safe and Supported Aboriginal and Torres Strait Islander First Action Plan*.

⁷ Ibid.

4. Design the dedicated vision and outcomes through a shared decision-making process, in partnership with Aboriginal and Torres Strait Islander representatives through shared decision-making mechanisms such as the Safe and Supported Aboriginal and Torres Strait Islander Leadership Group.

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 other changes we could make to the program to help your organisation or community overcome current challenges?
from Discussion Paper: 'Under the proposed program, funding will prioritise ACCO-led service delivery in communities with significant First Nations populations.'

Single national program

SNAICC supports, in principle, the flexibility that a single national program would provide given the holistic nature of many ACCO-run programs which are delivered in culturally specific, place-based ways. Narrowly defined streams, such as Communities for Children or HIPPY, have required ACCOs to sub-contract from larger non-Indigenous organisations to receive program funding.

Funding Streams

SNAICC welcomes the focus on early prevention and support in the proposed funding streams and notes that this position is aligned with *Safe and Supported* and the NCFIS. SNAICC also welcomes a focus on national programs, provided that place-based community-led service delivery programs are not disadvantaged by a lack of footprint to deliver on a national basis.

SNAICC agrees with the SAFeST Start Coalition submission that that these funding streams should explicitly recognise, amongst other things, 'antenatal cultural support, unborn child concerns, family healing, cultural mentoring, or the unique workforce needs of ACCOs.'⁸

Overcoming current challenges

To be effective, the new FaC program must address existing challenges that ACCOs face in accessing funding, including competitive grant processes, systemic underinvestment, a lack of proportional funding targets, and culturally unsafe service delivery by non-Indigenous organisations (these barriers and mechanisms to overcome them are discussed below on page 25).

⁸ Above n. 1.

Prioritising investment

Do you agree that the four priorities listed on page 4 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?

Priority	SNAICC position
Invest early to improve family wellbeing, break cycles of disadvantage, and reduce the need for later interventions – like child protection	SNAICC supports this priority and agrees that investment must shift toward early prevention focused on culturally grounded supports. SNAICC notes that NCFIS emphasises that early, prevention focused and holistic support models are evidence based and reduce the risk factors associated with statutory intervention.
Prioritise connected, co-located, and integrated services that work together to meet family needs.	<p>SNAICC supports this priority. The Connected Beginnings program provides a good model of integrated family service provision. Independent evaluations⁹ have confirmed its success in improving access to early childhood, health, and family supports for Aboriginal and Torres Strait Islander children through locally driven, community-led approaches.</p> <p>Currently rolled out to 50 sites, Connected Beginnings' aim is to increase Aboriginal and/or Torres Strait Islander children's and families' engagement with health and early childhood education and care (ECEC). It improves access to existing early childhood, maternal and child health, and family support services so children are safe, healthy and ready to thrive at school by the age of five.</p> <p>The programs are developed and run by 'backbone organisations', which are teams that work with Aboriginal and Torres Strait Islander community members and organisations to codesign goals and solutions to support children. This ensures the sites:</p> <ul style="list-style-type: none"> • are led by Aboriginal and Torres Strait Islander peoples • fund meaningful activities delivered in place and on Country • fund solutions that meet the unique needs of each community.
Ensure services are informed by, and respond to, community needs.	This priority should be expanded to acknowledge that in the case of Aboriginal and Torres Strait Islander communities ACCOs are best placed to improve outcomes through community-led design and ACCO leadership and governance.
Improve outcomes for First Nations children and families by increasing the number of Aboriginal and Torres Strait Islander community-controlled organisations	ACCOs should be the preferred providers for children and family services delivered to Aboriginal children and families under FaC in all locations. This is because, as acknowledged by the Discussion Paper, 'culturally safe, community-led services are the best way to support Aboriginal and Torres

⁹ Inside Policy (2023) *Connected Beginnings Mid-Term Evaluation Final Report* <https://www.education.gov.au/early-childhood/resources/evaluation-connected-beginnings-midterm-report-2023>; Australian Healthcare Associates Evaluation of the Connected Beginnings Program <https://www.ahaconsulting.com.au/projects/connected-beginnings/>

(also called ACCOs) delivering supports in locations with high First Nations populations.	<p>Strait Islander children and families'.¹⁰ SNAICC's recommendations as to how to overcome barriers to prioritising investment in ACCOs are discussed below.</p> <p>Additionally, as recognised by SAFeST Start Coalition, this priority “must go beyond [just] increasing ACCO involvement — it must centre ACCO leadership, redirect resources to community control, and shift power away from statutory systems towards cultural authority.”¹¹</p>
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Recommendations:

5. Priority area “Ensure services are informed by, and respond to, community needs” should be expanded to acknowledge that in the case of Aboriginal and Torres Strait Islander communities ACCOs are best placed to collaboratively identify and respond to local needs through community-led design and ACCO leadership and governance.
6. ACCOs should be made the preferred providers for *all* children and family services delivered to Aboriginal children and families under FaC.

Improving family wellbeing

Do the proposed focus areas – like supporting families at risk of child protection involvement and young parents – match the needs or priorities of your service?

Are there other groups in your community, or different approaches, that you think the department should consider to better support family wellbeing?

SNAICC presumes that the term “focus areas” refers to the “key areas on interest” outlined on page 5 which are:

- Families at risk of child protection involvement.
- Prevention and early intervention support for children aged 0-5 years.
- Young parents aged under 25.

Families at risk of child protection involvement.

To ensure children and families in need are not unnecessarily excluded from supports, SNAICC recommends that the Government ensures that this focus area includes:

- families who have had contact with child protection and remain at risk of future contact if the family remains unsupported
- families who have had children removed (and or reunified) who remain at risk of further children protection involvement.
- grandparents and kin who carry cultural child-rearing responsibilities

¹⁰ This is also aligned with National Agreement’s acknowledgment that ACCO services ‘are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services’ - Joint Council on Closing the Gap (2020) *National Agreement on Closing the Gap*, Canberra: Department of the Prime Minister and Cabinet, Australian Government.

¹¹ Above n. 1.

- families experiencing multiple forms of disadvantage, who may not be at immediate risk of child protection involvement but may face that risk if they remain unsupported.

With regard to the last category, it is crucial that FaC be available to Aboriginal families experiencing intersecting and compounding forms of disadvantage. These include families experiencing intersecting pressures such as poverty, insecure housing, disability, intergenerational trauma, and the cumulative effects of racism and discrimination when engaging with mainstream systems. These pressures often sit underneath what is labelled 'risk' once those stressors become acute, yet they are rarely addressed through early supports.

DSS should also consider the focus area of families who avoid services due to fear of child protection involvement. As noted above, many Aboriginal and Torres Strait Islander families have had negative experiences with mainstream services that felt unsafe or judgemental. This is particularly relevant for pregnant people, young parents, kinship carers, and families who have previously had contact with child protection. If these families are not explicitly recognised, they will continue to miss out on the early supports they have asked for.

Prevention and early intervention support for children aged 0-5 years.

Aboriginal children entering out of home care under the age of two are the least likely age group to be reunified with their families¹² and much more likely than non-Indigenous children to be removed for longer than two years¹³. Numerous inquiries have recommended that the appropriate response to any child protection concerns at any age, but particularly the pre-birth, newborn or preschool stage should involve culturally appropriate early support and the opportunity for the child to remain with family and community without statutory intervention.¹⁴ Unfortunately a lack of culturally safe and responsive service systems results in Aboriginal and Torres Strait Islander children and families being under-represented in universal prevention and early intervention services.¹⁵

This highlights the pressing need for additional investment in evidence-based and culturally safe Aboriginal and Torres Strait Islander community-controlled early childhood education and care, maternal and child health, trauma informed and healing services, family support services and family violence prevention and response.

¹² Newton B, Katz I, Gray P, Frost S, Gelaw Y, Hu N, Lingam R and Stephensen J (2024) Restoration from out-of-home care for Aboriginal children: Evidence from the pathways of care longitudinal study and experiences of parents and children. *Child Abuse & Neglect* Volume 149, March 2024 doi:10.1016/j.chiabu.2023.106058.

¹³ SNAICC (2024) *Family Matters Report 2024*. Melbourne: SNAICC – National Voice for our Children.

¹⁴ Davis M (2019) *Family is Culture: Independent review of Aboriginal children and young people in OOH (NSW)*, NSW Department of Communities and Justice: 310-312; Yoorrook Justice Commission (2023) *Yoorrook For Justice Report: Report into Victoria's Child Protection and Criminal Justice Systems*, Parliament of Victoria; Lawrie A (2024) *Holding on to Our Future: Final Report of the Inquiry into the application of the Aboriginal and Torres Strait Islander Child Placement Principle in the removal and placement of Aboriginal children and young people in South Australia*, Commissioner for Aboriginal Children and Young People South Australia: 67.

¹⁵ Above n. 14.

There is already promising emerging work in this area. SNAICC is a partner with the Improving Multidisciplinary Responses (IMR) Program. The IMR program supports child and family services to enhance and improve responses to Aboriginal and Torres Strait Islander families with multiple and complex needs. The IMR program demonstrates the success that occurs when ACCOs are supported, with Aboriginal and Torres Strait Islander cultural knowledge at the centre, to build their footprint and service delivery.¹⁶

Young parents aged under 25

This focus area should be expanded to include people under 25 who are pregnant and at risk of pre-birth child protection involvement, to reduce their likelihood of involvement in the child protection system. Risks to child and family wellbeing may occur prior to birth – as reflected in the numbers of pre-birth notifications received by child protection departments. In particular, Aboriginal and Torres Strait Islander unborn babies are reported to child protection at high rates in every jurisdiction where relevant data exists¹⁷. Early and preventative support program design should reflect this reality.

Proposed new focus: Families with children in contact with or at risk of contact with the youth justice system

Aboriginal and Torres Strait Islander children are significantly over-represented at every point of the youth justice system in every jurisdiction. The majority of Aboriginal and Torres Strait Islander child in youth justice is or has been in contact with child protection: out of home residential care in particular is a direct feeder or pipeline into the criminal justice system for children as young as 10.¹⁸ For these ‘crossover children’ being in the child protection system makes them 12 times as likely as their peers in the general population to be under child justice supervision and represent more than 75% of the children who become incarcerated in child detention¹⁹ (AIHW 2024).

Contact with the youth justice system is a flag of unaddressed family disadvantage, indicating the need for more support, not tertiary system responses. Children involved in the child justice system are more likely to have:

- experienced family violence or neglect²⁰
- experienced multiple traumatic stressors which can be associated with developmental and health difficulties, and substance abuse²¹

¹⁶ More information and case studies available on SNAICC’s IMR website, <https://www.snaicc.org.au/our-work/child-and-family-wellbeing/improving-multidisciplinary-responses-program/>

¹⁷ AIHW Child Protection Australia 2025, TableS2.3.

¹⁸ Yoorrook Justice Commission (Yoorrook) (2023) *Yoorrook for Justice: Second Interim Report*. Melbourne: Yoorrook Justice Commission; Baidawi S, Ball R, Sheehan R and Papalia N (2024) *Children aged 10 to 13 in the justice system: Characteristics, alleged offending and legal outcomes*. Report to the Criminology Research Advisory Council. Australian Institute of Criminology, Australian Government. doi:10.52922/crg77185.

¹⁹ Australian Institute of Health and Welfare (2024) *Young people under youth justice supervision and their interaction with the child protection system 2022–23*, Canberra: Australian Institute of Health and Welfare, Australian Government.

²⁰ Astridge et al. (2023) *A systematic review and meta-analysis on adverse childhood experiences: Prevalence in youth offenders and their effects on youth recidivism*. Child Abuse & Neglect June 2023 doi: [10.1016/j.chiabu.2023.106055](https://doi.org/10.1016/j.chiabu.2023.106055)

²¹ Harris A (2023) *Trauma, young people and Juvenile Justice*. Australian Child and Adolescent Trauma, Loss and Grief Network, Australian National University.

- an undiagnosed disability (such as foetal alcohol spectrum disorder) or poor mental health²²
- experienced homelessness²³

Recommendations:

7. SNAICC recommends that the Government ensures that the focus area “Families at risk of child protection involvement” includes:
 - a. families who have had contact with child protection and remain at risk of future contact if the family remains unsupported
 - b. families who have had children removed (and or reunified) who remain at risk of further children protection involvement.
 - c. grandparents and kin who carry cultural child-rearing responsibilities
 - d. families experiencing multiple forms of disadvantage, who may not be at immediate risk of child protection involvement, but may face that risk if they remain unsupported
 - e. families who avoid services due to fear of child protection involvement
8. Expand focus area “Young parents aged under 25” to include people under 25 who are pregnant and at risk of pre-birth child protection involvement
9. Add new focus area: *Families with children in contact with or at risk of contact with the youth justice system*

Connected, co-located, and integrated services

What are other effective ways, beyond co-location, that you’ve seen work well to connect and coordinate services for families?

What would you highlight in a grant application to demonstrate a service is connected to the community it serves?

What should applicants be assessed on?

Effective ways to connect and coordinate service for families

Integrated service delivery requires shared purpose, cultural authority and coordinated pathways, not just a shared location.

In SNAICC’s experience working with ACCOs and communities across Australia, to connect and coordinate services – and achieve improved outcomes for Aboriginal and Torres Strait Islander children and families – DSS must embed the following design requirements in programs funded under the FaC:

- community-led governance and decision-making structures guiding local service integration – such as the place-based partnerships established under the National Agreement on Closing the Gap
- partnership models where ACCOs hold leadership roles, and mainstream services partner under ACCO direction, demonstrating alignment with key principles and indicators of

²² Bower C, et al (2018) *Fetal alcohol spectrum disorder and youth justice: a prevalence study among young people sentenced to detention in Western Australia*. *BMJ Open*, 8(2) doi:10.1136/bmjopen-2017-019605.

²³ AIHW (2024); YFoundation (2021) *Young, in trouble and with nowhere to go: Homeless adolescents’ pathways into and out of detention in NSW*. Sydney: YFoundation.

genuine partnership and shared decision-making as enunciated by ACCOs (including, for example, SNAICC's *Creating Structural Change Through Shared Decision-Making: Guidance for Government and Aboriginal and Torres Strait Islander Organisations*²⁴ and *Opening Doors Through Partnerships and Creating Change Through Partnerships* resources)²⁵

- culturally safe knowledge sharing frameworks between organisations to facilitate service transitions and collaboration
- holistic, wrap-around and multi-disciplinary supports that address housing, health, income, safety, healing and early childhood development concurrently.
- multiple entry points and flexible referral pathways that enable families to access support where and how they choose
- culturally capable, trauma informed and strengths-based practice which includes Aboriginal healing frameworks and Aboriginal ways of knowing, being and doing.

These models achieve genuine integration because they are grounded in culture, trust and community authority, and they enable system integration even without physical co-location.

Demonstrating connection with community

To show genuine community connection, providers should demonstrate:

- local Aboriginal and Torres Strait Islander governance with Elders, families and ACCOs shaping service design, delivery and evaluation
- evidence of strong and existing partnerships with ACCOs, not merely promises of future collaboration
- cultural safety frameworks including the employment of Aboriginal staff, cultural supervision and community-led practice guidance. This includes trauma-informed practice and embedding Aboriginal ways of knowing, being and doing
- a documented history of community engagement featuring ongoing engagement, consultation, co-design activities and feedback loops that have shaped program evaluation.
- integration with local service ecosystems, especially with ACCOs, early childhood services, youth services, health and housing support.

Assessing applicants

To demonstrate genuine community connection, applicants should be assessed on:

- cultural safety and responsiveness

²⁴ [Creating-Structural-Change-Through-Shared-Decision-Making-Guidance.pdf](https://www.snaicc.org.au/wp-content/uploads/2016/01/02804.pdf)

²⁵ SNAICC's Genuine Partnerships resources set out principles, strategies and reflective practice tools for establishing and embedding genuine, culturally safe partnerships between ACCOs and non-Indigenous organisations in the provision of child and family services to Aboriginal and Torres Strait Islander communities. These resources are complemented by the *Genuine Partnerships Audit Tool* (see below n23).

SNAICC (2012). *Opening doors through partnerships: practical approaches to developing genuine partnerships that address Aboriginal and Torres Strait Islander community needs*, <https://www.snaicc.org.au/wp-content/uploads/2016/01/02804.pdf>;
SNAICC (2014). *Creating change through partnerships: An introductory guide to partnerships between Aboriginal and Torres Strait Islander and non-Indigenous organisations in child and family services*, https://www.snaicc.org.au/wp-content/uploads/2020/02/1148_SNAICC_PartnershipBook_LR-Final.pdf

- demonstrated leadership or meaningful partnership with ACCOs which honour honouring self-determination, cultural governance and the sovereign voices of Aboriginal and Torres Strait Islander
- community trust and legitimacy
- capability to deliver holistic wrap-around, trauma-aware supports
- alignment with early intervention and healing models
- accessible and multiple-entry service pathways
- ability to deliver outcomes that address underlying social determinants
- sustainability and stability of culturally responsive services models,

Recommendation:

10. DSS should require that funded services demonstrate genuine integration driven by community authority rather than just physical co-location.
11. Applicants should be required to clearly demonstrate that they are embedded in, trusted by and accountable to the community they serve.
12. Assessment criteria should focus on the capability to deliver culturally safe, community-driven, holistic support models that achieve long-term wellbeing outcomes.

Responding to community need

Beyond locational disadvantage, what other factors should the department consider to make sure funding reflects the needs of communities?

What's the best way for organisations to show in grant applications, that their service is genuinely meeting the needs of the community?

Relevant factors to ensure funding reflects the needs of communities

While Aboriginal and Torres Strait Islander people are disproportionately impacted by locational disadvantage, geography alone cannot explain or predict community need. As noted above, Aboriginal and Torres Strait Islander children and families experience complex socio-economic challenges, which vary from community to community, that result from the historical and ongoing impacts of racism, colonisation and intergenerational trauma.

As such the department should also take into account factors such as:

- local histories of child removal and distrust of systems
- lack of transparency in child protection practices within maternal and child health services which does not drive best prevention practice and undermines any capacity for cultural safety within health services
- community-identified risks (e.g., racism in antenatal services)
- strength of local ACCO infrastructure
- cultural obligations and kinship complexity
- housing precarity and poverty as systemic drivers, not parenting deficits.²⁶

²⁶ Above n. 1.

So federal datasets must be supplemented and validated by locally held community knowledge. Mechanisms to achieve this are outlined directly below.

Demonstrating in grant applications that a service is meeting community need

To ensure funding meets the needs of communities, funding applications and funding arrangements for the delivery of services to Aboriginal and Torres Strait Islander people under FaC must evidence:

- strength-based community needs assessments that prioritise ongoing connection to community, culture and Country (ideally this assessment should be led by an ACCO or community Elders).
- community-led design and governance structures that ensure Aboriginal and Torres Strait Islander leadership guides service focus, methods and evaluation²⁷
- embedded cultural knowledge and healing practices that include trauma-informed, strengths-based cultural frameworks
- use of community-defined data including community consultations, local stories, qualitative data and ACCO-held insights
- adherence to Indigenous Data Sovereignty principles in the collection, storage, interpretation and dissemination of data about Aboriginal and Torres Strait Islander people (these principles are outlined in more detail below on page 24).

Grant applications, made by mainstream organisation for the delivery of services to Aboriginal and Torres Strait Islander people under FaC, should also address:

- how the applicant will be genuinely accountable to and involve ACCOs and community leadership in decision-making across the funded activities – for example, through MOUs and partnership agreements (which incorporate mandatory genuine partnership principles²⁸) and co-governance committees.
- how the applicant will transition services and supports to any ACCO partner (this must be measurable and reportable)
- partnership with existing local community-controlled governance structures, to ensure any relevant factors are managed and addressed in ways that work for the community
- demonstrated track record of community trust (including engagement rates, feedback results) and delivering culturally safe, trauma integrated mainstream services for families
- demonstrated incorporation of community consultation in development of program, partnerships (preferably longstanding).

The Government's direction towards longer-term funding and relational contracting provides an opportunity to formalise these expectations by making ACCO leadership central to funding

²⁷ As noted by Dr Paul Gray at the recent DSS-led consultation on the FaC (28 November 2025): 'Evaluation should rest with community. Evaluation should be part of investment in communities to build their own evidence and self-governance.'

²⁸ SNAICC's Genuine Partnerships Audit Tool provides a framework for measuring progress towards genuine partnership goals. Organisations are encouraged to use this audit tool as a first step in reviewing and reflecting on their current needs and/or strengths, as well as to measure progress towards achieving genuine partnership goals. <https://www.snaicc.org.au/resources-training/learning-development/genuine-partnerships-audit-tool/>

decisions – and ensuring shared decision-making processes are reflected in policy design and implementation, in accordance with the National Agreement on Closing the Gap.

Recommendation:

13. To ensure funding reflects the needs of communities, consider federal data sets alongside locally held community knowledge.
14. To ensure funding meets the needs of communities, funding applications and funding arrangements for the delivery of services to Aboriginal and Torres Strait Islander people must demonstrate: community-led needs assessments, Aboriginal and Torres Strait Islander leadership in design and governance, embedded cultural healing practices, use of community-defined data, and adherence to Indigenous Data Sovereignty principles.
15. Grant applications, made by mainstream organisation for the delivery of services to Aboriginal and Torres Strait Islander people under FaC, should also show genuine accountability to ACCOs through formal partnerships, measurable transition of services and supports, alignment with local community-controlled governance, evidence of community trust, and demonstrated cultural safety in service delivery.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

How could the grant process be designed to support and increase the number of ACCOs delivering services to children and families?

What else should be built into the program design to help improve outcomes for Aboriginal and Torres Strait Islander children and families?

Redesigning the grant process to support and increase the number of ACCOs

‘If we invest in Aboriginal communities, with a clear proportion of investment, and enable communities to be flexible in how they deliver support, then we can have a different sort of relationship between the state and Aboriginal communities that can actually be more responsive to needs. Yes, it also requires Aboriginal communities to organise themselves in ways to exercise that authority, but without actual transfer of authority, there is no current impetus behind that - it's a futile task that carries responsibility but no power. In my view, a key 'metric' for this process is how well it actually shifts systems - that's something DSS should be marked on.’²⁹

SNAICC has long advocated for various mechanisms to overcome this bias and increase the number of ACCOs delivering supports – as well as the availability of more culturally safe supports from mainstream services – in order to improve the outcomes of our children and families.

We welcome the Department’s acknowledgement that “culturally safe, community-led services are the best way to support Aboriginal and Torres Strait Islander children and families”. It is also important to recognise that significant reform of the FaC is required to overcome the structural

²⁹ Dr Paul Gray, Safe and Supported Aboriginal and Torres Strait Islander Leadership Group member, DSS-led Consultation on FaC, 28 November 2025

and institutional racism and bias, identified in SNAICC's Stronger ACCOs, Stronger Families report.

SNAICC has long advocated for various mechanisms to overcome this bias and increase the number of ACCOs delivering supports – as well as the availability of more culturally safe supports from mainstream services.

Many of these mechanisms and approaches are reflected in the Investment Strategy which the Commonwealth has just endorsed.

These mechanisms include:

Overcoming funding barriers

- ACCOs should be the preferred providers for children and family services delivered to Aboriginal children and families under FaC in all locations and quarantined funding must be allocated based upon the proportionate need and target population. If quarantined funding is not an option, the Government should establish targets for the proportion of funding to be managed by ACCOs.
- Provide long term and core operational funding for ACCOs so they can sustain and grow child and family services instead of competing from grant round to grant round.
- Ensure funding allocations to ACCOs align with the full cost of effective ACCO service delivery and include additional funding which takes into account cultural loading (in recognition that ACCOs typically support children and families in a holistic way over and above programmatic requirements).
- Where partnerships with non-Indigenous organisations are used as a mechanism to support ACCO development and transition funds to ACCOs, ensure ACCOs have the option to become the lead funding recipients to address power imbalance and ensure genuine Aboriginal and Torres Strait Islander community leadership in partnerships.
- Ensure funding is available for a model where an established ACCO is funded to auspice, scaffold and support a smaller or new ACCOs until they are ready to operate independently – a way to do that could be SNAICC's 'Nest and Nurture' model. In fact this model has been waiting for a moment like this one. Additionally, SNAICC's Early Years Support Model provides an evidence-based blue print to support ACCO readiness and expand and strengthen the ACCO sector in a sustainable and community-led way (see case study directly below).
- Where mainstream organisations apply for FaC funding, require their funding proposal to identify how they will partner with ACCOs to improve their cultural safety and trauma-informed practice when working with Aboriginal and Torres Strait Islander children and families.
- Government partnering with SNAICC and jurisdictional peak organisations to support ACCOs to put forward strong proposals to deliver the children and family services their communities need.

SNACC's Early Years Support program

The challenge

Despite widespread recognition of their importance, ACCOs delivering early childhood services face substantial operational and systemic challenges. These challenges are largely rooted in funding and policy frameworks that are often misaligned with the ACCOs' most effective ways of working, restricting their ability to provide high-quality, accessible services. Before the introduction of SNAICC Early Years Support, many ACCOs operated in relative isolation, with limited engagement with other organisations and inconsistent support from government systems. This isolation exacerbated existing challenges, leaving services to navigate complex regulatory and funding requirements largely on their own.³⁰

The response: the Early Years Support (EYS) program

The Early Years Support (EYS) program – first established in 2020 – is explicitly designed to strengthen Aboriginal and Torres Strait Islander community-controlled early childhood services across Australia in three states: New South Wales, Victoria and Western Australia.

Through EYS, SNAICC works closely with ACCO early-years services to respond to local priorities, tailoring its efforts to strengthen various aspects of service provision. This includes back-office support, the refinement of service design and governance, improving service delivery (including through evaluation support), ensuring compliance with quality standards and focusing on workforce development and training in order to increase service footprint and service. Additionally, the program offers invaluable assistance in securing sustainable funding through advocacy support, ensuring that these crucial services can continue to thrive and meet the needs of our children, families and communities.

The evidence base: Deloitte's evaluation of EYS

Critically, an independent 2025 evaluation by Deloitte Access Economics confirms that EYS is “highly valued and trusted within the ACCO sector.”³¹ The evaluation confirmed that the EYS program is a highly valued and effective initiative delivering substantial support to ACCO Early Years Services. The program's greatest strengths are:

- **Building Trust and Culturally Safe Relationships:** Services consistently described the program as a trusted and culturally respectful partner. This foundation of trust is the primary enabler of its success, with **86% of surveyed** services, under the evaluation agreeing that it has built strong relationships.
- **Reducing Isolation and Strengthening Connections:** By facilitating network meetings and gatherings, the program has created a stronger, more connected ACCO sector, effectively reducing the sense of services “working alone” and fostering a powerful sense of shared community.

³⁰ [FINAL REPORT – SNAICC Early Years Support Evaluation Update \(January 2025 – July 2025\)](#)

³¹ [FINAL REPORT – SNAICC Early Years Support Evaluation Update \(January 2025 – July 2025\)](#)

- **Improving Service Quality:** Tailored, responsive support has directly contributed to tangible improvements in service quality, stronger cultural practices and increased confidence in meeting or exceeding the National Quality Standard. 88 per cent of survey respondents agreed or strongly agreed that the support provided was responsive to service needs.
- **Effective Advocacy and Representation:** The program has successfully amplified the collective voice of ACCO services, effectively influencing government policy and creating new opportunities for sector representation in key forums.
- **Practical Operational Support:** Services reported significant benefits from back-office assistance, including compliance, administration, workforce development and funding support, which has reduced the administrative burden on service leaders.

For the purposes of FaC reform, EYS provides a ready blueprint for unleashing the untapped potential of ACCOs. Embedding similar supports – secure funding, workforce development, culturally grounded governance and ACCO-led service codesign – across all ACCO sectors, would not just support readiness, but expand and strengthen the ACCO sector in a sustainable and community-led way.

Shared decision-making in funding allocation

Communities should be represented on grant funding panels. As stated in our February 2025 submission, funding will reach communities faster and with greater precision if Aboriginal and Torres Strait Islander-led decision-making takes place in the early stage of funding development and allocation for programs with high demand from Aboriginal and Torres Strait Islander children and families. System Element 4 of the NCFIS requires that governments move towards ‘Aboriginal-led decision making’ rather than ‘shared-design decision making’ in national program and service design.

As the NCFIS states, Aboriginal and Torres Strait Islander led decision-making is crucial because government-funded programs often do not meet Aboriginal and Torres Strait Islander community needs or support holistic care models, and thus are incapable of supporting improved outcomes. The development of Aboriginal and Torres Strait Islander commissioning policies, processes and frameworks are a key mechanism to advance Aboriginal led decision-making for funding allocation.

Other relevant factors to improve program design

The Discussion Paper states that the new program aims to ‘fund a wide range of “evidence-informed” services’. SNAICC’s *Stronger ACCOs, Stronger Families* report (2023) found that ACCOs are particularly disadvantaged in Australian Government procurement processes that include evidence-based requirements, due to the lack of research and evaluation available to demonstrate their programs’ effectiveness.

In 2025, SNAICC was the First Nations partner on a DSS project managed by the Australian Institute for Family Studies (AIFS) to reshape the ‘evidence-based requirement’ for the Communities for Children program, which is now to be merged into the new proposed single program. SNAICC produced an evidence review that identified the key characteristics of programs

or services that improve Aboriginal and Torres Strait Islander child and family wellbeing, which can be summarised as:

- Community involvement
- Connection to culture
- Holistic wellbeing
- Strong and valued families.

The Government must ensure that any ‘evidence-informed’ program requirements allow for evidence that is produced through Aboriginal and Torres Strait Islander cultural knowledge, lived experience, expertise and relationships. Although the reshaping of the Communities for Children evidence-based requirement has not proceeded due to the broader FaC Activity reforms, the practice insights, tool and underlying evidence review are held within DSS for use when determining the requirements for funding any new FaC programs. These findings should inform what any ‘evidence-informed’ requirement for funding under FaC to deliver services to Aboriginal and Torres Strait Islander people.

The Early Childhood Care and Development Policy Partnership has also commissioned a group of Aboriginal and Torres Strait Islander research organisations to develop an Evidence Guidance Framework,³² which will build a shared understanding between governments, ACCOs and communities about evidence and best practice in child and family support services for Aboriginal and Torres Strait Islander children and families. Once developed the Framework must inform how the Government considers evidence in the context of child and family services.

Recommendations:

16. To increase the number of ACCOs delivering services to children and families:

- a. Allocate long-term, core operational funding to ACCOs, ensure funding reflects the full cost of culturally safe service delivery, and support models like SNAICC’s ‘Nest and Nurture’ and proven Early Years Support Model to scaffold and scale ACCOs.
- b. Include community representation on funding panels and develop commissioning policies that give Aboriginal-led governance a central role in funding allocation.
- c. Require mainstream applicants to demonstrate genuine partnership with ACCOs and provide ACCOs the opportunity to lead partnerships to address power imbalances.
- d. Ensure evidence-informed funding requirements value Aboriginal and Torres Strait Islander knowledge, lived experience, and holistic approaches to child and family wellbeing, supported by emerging tools such as the forthcoming Evidence Guidance Framework.

Measuring outcomes

³² The group comprises the Queensland Aboriginal and Torres Strait Islander Child Protection Peak, the Jumbunna Institute for Indigenous Education and Research at the University of Technology Sydney and Professor Cath Chamberlain.

What types of data would help your organisation better understand its impact and continuously improve its services?

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?

If your organisation currently reports in the Data Exchange (DEX), what SCORE Circumstances domain is most relevant to the service you deliver?

What kinds of templates or guidance would help you prepare strong case studies that show the impact of your service?

If your organisation currently reports in the Data Exchange (DEX), what SCORE Circumstances domain is most relevant to the service you deliver?

Data to demonstrate impact for services delivered to Aboriginal and Torres Strait Islander children and families

To demonstrate impact for services delivered to Aboriginal and Torres Strait Islander children and families, outcome measurement under FaC must be strengthened, in the short term, to:

- genuinely align with community priorities and Aboriginal-led practice, consistent with Priority Reforms 1, 2 and 4 of the National Agreement on Closing the Gap
- report on transition outcomes including:
 - strengthened community footprint to respond to community need
 - authority
 - Aboriginal and Torres Strait Islander workforce growth and development
 - culturally responsive programs designed and led by community (including delegated authority)
- Gather data aligned with available evidence on the characteristics of programs or services that improve Aboriginal and Torres Strait Islander child and family wellbeing (as noted above).

SNAICC also endorses SAFeST Start Coalition's proposed measures, which include:

- reduction in unborn reports and child protection involvement
- family perceptions of safety, trust and empowerment
- healing outcomes, not just behavioural changes
- developmental improvements in babies and young children
- best practice guidelines for prevention of child removals, with indicators to monitor that these are being implemented.³³

Over the longer-term, SNAICC advocates for the development of an Aboriginal and Torres Strait Islander designed and led alternative to the current DEX system due to SNAICC's broader and ongoing concerns about the DEX (outlined directly below).

Overarching concerns regarding the use of DEX for reporting on programs delivered to Aboriginal and Torres Strait islander children and families

A 2020 independent evaluation of Government-funded Intensive Family Support Service (IFSS) programs found DEX data reporting requirements are 'inadequate' in their design to provide

³³ Above n. 1.

insights into the efficiency of their program.³⁴ IFSS service providers struggled to match the DEX reporting categories to their work with children and families, because there was no dedicated category to capture informal engagement with communities, or engagement with other services.³⁵

Critically, the DEX system, as currently implemented, does not reflect culturally relevant outcomes for Aboriginal and Torres Strait Islander children and families. Instead, it imposes standardised data formats that are difficult to apply in diverse local contexts and often fail to align with the ways in which ACCO-run programs are delivered on the ground. DEX also fails to measure what matters most to communities, undermining the innovation and culturally responsive practices essential to Closing the Gap.

ACCOs, peaks and communities have raised concerns about:

- invasive demographic questioning within DEX (e.g. income, household size, disability status, Aboriginal heritage, place of birth) which can be culturally inappropriate and hinder engagement
- the requirement to link DEX data to personal MyGov accounts, which has been strongly resisted by our partners due to privacy and cultural safety concerns
- the role of FAMS intermediaries, which are often seen as disconnected from ACCOs, at times culturally unsafe, and misaligned with community-led approaches to service delivery and reporting.

To illustrate this, we have **attached** to this submission a case study drafted by SNAICC outlining DEX reporting challenges experienced in the First Nations Playgroup Pilot Program.

SNAICC urges DSS to prioritise a program of work that:

- explores culturally safe alternatives to the current MyGov-DEX linkage requirement
- reduces administrative burden on ACCOs and recognises the value of place-based, strengths-based reporting
- over the longer terms, reviews the FAMS requirement and considers transitioning to a culturally governed reporting model that empowers ACCOs to define and report outcomes in ways that reflect their community's strengths and needs.

We believe there is a significant opportunity for DSS to lead the development of a culturally safe, community-led alternative to the DEX framework. Such a shift would ensure reporting mechanisms are not only more accurate but also more respectful and empowering for the Aboriginal and Torres Strait Islander organisations and communities delivering vital early years services.

Use of SCORE for Aboriginal and Torres Strait Islander programs

As stated in SNAICC's February 2025 submission, DSS's Data Exchange (DEX) SCORE data should **not** be used to evaluate program outcomes for Aboriginal and Torres Strait Islander children and families who are engaged in FaC Activity-funded programs. Instead, as noted above, the

³⁴ Social Compass 2020, 'Evaluation of the Intensive Family Support Service', p. ix. Retrieved from: <https://www.dss.gov.au/system/files/resources/attachment-c-ifss-final-evaluation-report.pdf>.

³⁵ Ibid, p. 36.

Government should partner with SNAICC and ACCOs to develop alternative culturally responsive outcomes measurement tools, informed by the forthcoming Early Childhood Care and Development Policy Partnership Evidence Guidance Framework.

In the Evidence Paper provided for the initial FaC review, DSS equated the results of SCORE with the Closing the Gap socio-economic outcomes to demonstrate positive improvements in goals and circumstances for Aboriginal and Torres Strait Islander children and families.³⁶ This is not a suitable 'like-for-like' equation. The Closing the Gap outcomes were negotiated and agreed in partnership with the Aboriginal and Torres Strait Islander community. In contrast, the SCORE approach does not measure if a service has strengthened the child and/or parent's cultural identity, which is a key determiner of the Aboriginal and Torres Strait Island child and/or parent's engagement with a program.

SNAICC is also concerned by the practice of non-Indigenous service providers giving their SCORE data directly to DSS, without assurances that Aboriginal and Torres Strait Islander communities and researchers were involved in data collection and analysis. This process contradicts Indigenous Data Sovereignty Principles and Priority Reform 4 in the National Agreement (the importance of including Indigenous Data Sovereignty in grant applications and program design is outlined below). There are a range of known factors that impact the quality of data in these circumstances, including the inherent conflict of interest in provider-generated data that may impact future funding for services and the well-founded fears of Aboriginal and Torres Strait Islander families that reporting negative outcomes and feedback to service providers will result in increasingly intrusive interventions.

SNAICC's [Evaluation Readiness Toolkit](#) and Kowa's [UMEL framework](#) are two examples of guidance to empower organisations working in the Aboriginal and Torres Strait Islander child and family services sector to design their own evidence base to prove and improve the effectiveness of their programs.

Reform data collection under the FaC program to comply with Indigenous Data Sovereignty principles

The Maïam nayri Wingara Indigenous Data Sovereignty Network has stated that priority data rights of Aboriginal and Torres Strait Islander peoples include:

- exercising control of data ecosystems, including creation, development, stewardship, analysis, dissemination and infrastructure
- data that is contextual and disaggregated (available and accessible at individual, community and First Nations levels)
- data that is relevant and empowers sustainable self-determination and effective self-governance
- data structures that are accountable to Indigenous peoples and First Nations
- data that is protective and respects Aboriginal and Torres Strait Islander peoples' individual and collective interests.

³⁶ Ibid.

Programs funded under DEX, which collect data about Aboriginal and Torres Strait Islander people should reflect Indigenous Data Sovereignty principles by enabling community input into what data is collected and where it is stored and who has access to it and how it is interpreted. The type of data collected as part of funding arrangements and reporting must be determined through shared decision-making processes with local Aboriginal and Torres Strait Islander representatives.

Under these arrangements, to comply with Indigenous Data Sovereignty Principles ACCOs should have access to all data collected by non-Indigenous organisations and the government in their area and be involved in decisions about what data is collected and how it is managed. Regional and jurisdictional data systems should be reviewed with Aboriginal and Torres Strait Islander input and individual service users should be able to access their own data at an individual level unless it would pose a safety risk.

Recommendations:

17. In the short term, ensure data collected under DEX aligns with:
 - a. community priorities and Aboriginal-led practice, consistent with Priority Reforms 1, 2 and 4 of the National Agreement on Closing the Gap.
 - b. available evidence on the characteristics of programs or services that improve Aboriginal and Torres Strait Islander child and family wellbeing
 - c. the Maiam Nayri Wingara principles of Indigenous Data Sovereignty with regards to its collection, storage, dissemination and use.
18. In the longer term, the department should partner with Peaks and ACCOs to design an outcomes measurement framework that is a culturally responsive and an appropriate alternative to current reporting via DEX – and reduces funding reporting and administration requirements.

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?

What's the best way for the department to decide which organisations should be offered a relational contract?

Is your organisation interested in a relational contracting approach? Why/why not?

The introduction of relational contracting is a reform that SNAICC has long called for. This will enable governments to work with Aboriginal and Torres Strait Islander communities and provide them the opportunity to lead service design and delivery matched to the needs of local communities. It will be important that relational contracting is implemented in the right way – building new relationships with Aboriginal and Torres Strait Islander services and communities that have had minimal access to Commonwealth family services funds, rather than reinforcing the existing decades long relationships with mainstream providers that have failed to deliver outcomes for Aboriginal and Torres Strait Islander families.

Relational contracting in practice

SNAICC sees relational contracting as a key step in the development of funding arrangements that are characterised by collaboration, trust and long-term security. As stated in the National Child and Family Investment Strategy, funding reforms should aim to develop Aboriginal and Torres Strait Islander-led commissioning frameworks, which 'ensures that families and communities are self-empowered to determine the investment into programs and services, based on their own needs and desired outcomes'.³⁷

Transaction-based reporting poses a risk of misrepresenting groups of people that experience structural disadvantage.³⁸ While transactional contracting can suit some funded activities (such as infrastructure projects), it is ill-equipped to accurately assess an organisation's suitability to engage in child and family support service provision. System measures based on performance alone are unsuitable for assessing complex social or human services processes, where outcomes cannot be demonstrated by reference to the fulfilment of contractual activities and deliverables.

Transactional contracting is based on economic indicators associated with performance and efficiency. While it is important to ensure public funding is used appropriately, an over-emphasis on performance leads to the preferencing of large, well-established national organisations in tender processes, due to their ability to deliver services more efficiently compared to smaller, less resourced organisations. Requests for tenders also often seek a scale of program delivery that is impossible for a smaller organisation to provide. Due to this, community organisations face severe challenges in accessing funding despite their inherently greater connection to service users and understanding of local needs and priorities.

In this context, we see relational contracting as a preferred approach that shifts the focus towards long-term cooperation between service providers and funding agencies, with the flexibility to achieve community determined outcomes. Such a contract can better respond to changes in service delivery approaches that may be required due to community expectations, economic need or emerging evidence – without being constrained by existing deliverables under a traditional transactional arrangement.

However, the development and implementation of relational contracting arrangements must address existing power imbalances and systemic inequalities. Relational contracts generally arise after a successful period of transactional contracting that builds trust between funding parties,³⁹ which means such approaches will likely favour the larger non-Indigenous organisations who enjoy strong pre-existing relationships with government.

³⁷ AbSec, (online) Aboriginal-led Commissioning, accessed 26 Nov 2025, <https://absec.org.au/commissioning/>

³⁸ Considine, M, (2025). Formal Relational Contracts and the Commissioning of Complex Public Services. The University of Melbourne. Report. <https://doi.org/10.26188/28544528.v1>
<https://doi.org/10.26188/28544528.v1>

³⁹ Considine, M (2025). Formal Relational Contracts and the Commissioning of Complex Public Services. The University of Melbourne. Report. <https://doi.org/10.26188/28544528.v1>
<https://doi.org/10.26188/28544528.v1>

Criteria and requirements for relational contract

To begin to address these power imbalances, relational contracting arrangements with ACCOs must be administered within Aboriginal and Torres Strait Islander-led commissioning frameworks.⁴⁰ Such processes should include grant assessment criteria, application assessment and dispute resolution. In the child and family sector, DSS should use existing shared decision-making structures under Safe and Supported to move towards Aboriginal and Torres Strait Islander led commissioning, in line with Action 2e of the Aboriginal and Torres Strait Islander First Action Plan.⁴¹

Further, power imbalances should be resolved through non-competitive funding processes, in which all ACCOs will be able to negotiate ongoing relational funding arrangements with government agencies – free from competition with non-Indigenous NGOs.

Recommendations:

19. Develop relational contracting guidelines for ACCOs to ensure that contracting processes are:
 - a. non-competitive
 - b. providing sustainable funding for ACCOs
 - c. flexible, outcomes focused and considerate of the strengths and needs of ACCOs (including scaling up footprint, workforce development and service and support transition)
20. Develop Aboriginal and Torres Strait Islander-led commissioning processes to oversee commissioning of child and family services, in line with Action 2.e of *the Safe and Supported Aboriginal and Torres Strait Islander First Action Plan*.

⁴⁰ Such as those outlined by AbSec, 2021, Commissioning Framework, https://absec.org.au/wp-content/uploads/2024/11/AbSec_December2021_Commissioning-Policy-Framework.pdf

⁴¹ Safe and Supported Aboriginal and Torres Strait Islander Action Plan