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Families
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Re : A new approach to programs for families and children

Thank you for the invitation to provide input into the national program reforms. We are pleased to provide the following contributions.

Vision and Outcomes

Does the vision reflect what we want for children and families?

The vision, “all children and young people are supported by strong families who have the skills and confidence to nurture them” (p. 3), is phrased positively, but it does not acknowledge the material and systemic conditions and racism that undermines family strength. Criminalised women tell us that “skills and confidence” are not the issue: poverty, homelessness, policing, child removal, and incarceration are. A vision that centres “skills” risks implying parental deficit rather than naming structural violence.

Are the two outcomes appropriate?

The outcomes are reasonable, but incomplete. They focus on individual resilience rather than collective or structural wellbeing. Families cannot be “empowered” in the face of punitive systems that remove children, criminalise survival, and fragment kinship. The outcomes must explicitly recognise that reducing state harm, including early intervention surveillance and child protection overreach, is core to achieving the stated vision.

Program Structure

Will a single national program provide more flexibility?

Yes, in theory, collapsing multiple programs into one structure (as proposed on pp. 2–4) may reduce administrative burden. However, flexibility must not be used to further concentrate funding into large national NGOs, which has historically undermined ACCOs, Indigenous led, and lived-experience-led organisations.

Do the three streams reflect community need?

The streams are workable, but Sisters Inside highlights the danger of categorising families, particularly criminalised families, as “at risk” and funnelling them into Stream 3 (Intensive Family Supports). This can inadvertently replicate child protection logics. Stream 3 should be redesigned to ensure:

- supports are voluntary
- engagement does not trigger automatic reporting
- there is no data-sharing pathway into punitive systems.

Prioritising Investment

Are the four priorities the right ones?

We strongly support the prioritisation of ACCO & Indigenous led services (p. 5) and early support for young parents. However, we caution against framing investment as a way to “reduce the need for child protection involvement.” For criminalised women and girls, child protection is often the first point of state punishment. Investment should instead prioritise:

- housing
- income security
- community-controlled services
- culturally grounded healing supports
- removing police and child protection from the centre of “family support.”

Improving Outcomes for Aboriginal and Torres Strait Islander Children and Families

How can the grant process increase the number of ACCOs delivering services?

- Use set-asides so that in communities with high First Nations populations, only ACCOs and Indigenous led organisations can lead delivery.
- Require non-Indigenous organisations to demonstrate genuine partnership, not token consultation.
- Prioritise governance led by people with lived expertise of incarceration, criminalisation, family separation, and colonial systems.

What else should be built into program design?

- Services must be community-led rather than “evidence-based” in ways that privilege Western evidence hierarchies.
- Funding must support cultural healing, kinship caregiving, and community-designed approaches.
- DSS should recognise that families are harmed by police, courts, prisons, and child protection. The program must not expand these pathways under the guise of “intensive” support.

Responding to Community Need

What should the department consider beyond locational disadvantage?

Beyond locational disadvantage, the department should consider the specific structural and systemic conditions that shape family wellbeing, including the criminalisation rates of women and girls, especially First Nations women who are disproportionately targeted by policing and justice systems. It must also take into account the high rates of child removal and the significant barriers to reunification faced by many families, as these are critical indicators of community need that cannot be captured through geography alone. Finally, DSS should recognise and prioritise community-identified needs and strengths, even when they do not align with Western developmental screening tools such as the AEDC, ensuring that funding decisions genuinely reflect the lived realities and priorities of the communities they aim to support.

How should organisations demonstrate they meet community need?

- Lived-experience governance
- Community-controlled frameworks

- Demonstrated ability to keep families intact without punitive reporting
- Evidence of trust from the community

Connected, Integrated Services

What works beyond co-location?

- Peer-led outreach
- Cultural and community yarning spaces
- Flexibility for services to follow the family rather than requiring families to navigate multiple bureaucracies
- Information-sharing boundaries to ensure families are not inadvertently reported to police or child protection

What should applicants be assessed on?

- Cultural safety
- Lived-experience leadership
- Ability to support families without coercion
- Demonstrated track record of keeping children with their families
- Community trust and relational connection (not just partnerships on paper)

Measuring Outcomes

What kinds of data are most valuable?

Sisters Inside cautions strongly against over-reliance on the DEX SCORE framework (p. 6). For criminalised women and girls, DEX reporting can be:

- inappropriate
- reductionist
- culturally unsafe
- unable to capture healing, safety, and community connection.

Qualitative case stories, written with consent and not linked to surveillance systems, are more meaningful for our communities. DSS should not require organisations to report data that could contribute to risk profiling or contact with statutory systems.

Working Together (Relational Contracting)

Is Sisters Inside interested in relational contracting?

Yes, if relational contracting means:

- long-term stability
- reduced administrative burden
- genuine trust in community-led models
- no additional layers of surveillance or reporting

Long-term funding contracts are essential to ensure the longevity and continuity of support for criminalised women, girls and families. Short-term or uncertain funding cycles undermine trust, disrupt relationships, and prevent organisations from building the deep, sustained, community-led responses needed to keep families safe and connected. Relational contracting must therefore include secure, multi-year funding arrangements that reflect the time required for healing, stability, and genuine community-driven change. Without long-term commitments, the program risks replicating the instability and fragmentation it seeks to address.

Sisters Inside cannot participate in models that require coercive information-sharing with state agencies.

Other Matters

It is essential that DSS understand that families are not “vulnerable” in the abstract; they are made vulnerable by systems of policing, poverty, racism, and child removal that target them. Aboriginal and Torres Strait Islander families, in particular, are strongest when solutions are designed, governed, and delivered by their own communities. Any new investment must avoid expanding state intervention or surveillance under the guise of “early support,” and must instead resource the cultural, material, and relational foundations that keep families safe. Community organisations like Sisters Inside are most effective when they are trusted to work holistically, relationally, and independently of punitive systems, guided by lived experience and grounded in community-defined understandings of safety and wellbeing.

Thank you for this opportunity to provide feedback to the consultation and we look forward to working in partnership with the Department of Social Services to support parents, families and children to live strong and healthy lives.

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