



Consultation Submission on the Second Action Plan (National Plan to End Violence against Women and Children 2022–2032)

August 2026

Role of the ACT Children and Young People Commissioner

The ACT Children and Young People Commissioner (CYPC) is one of eight independent statutory roles that together make up the ACT Human Rights Commission. These roles promote and protect the human rights of all people living in the ACT and have legislative responsibility for protecting some of Canberra's most vulnerable citizens.

The role of the CYPC is to:

- Promote the rights, safety, and wellbeing of children and young people,
- Consult and talk with children and young people and promote their participation in decision-making,
- Ensure stakeholders listen to and seriously consider the views of children and young people,
- Promote implementation of the ACT Child Safe Standards, and
- Provide advice to government and community agencies about how to improve services for children and young people.

The CYPC is also the ACT Public Advocate.

Membership of the ANZCCGA

The CYPC is also a member (and currently Co-Chair) of the Australian and New Zealand Children's Commissioners, Guardians, and Advocates (ANZCCGA), a collective body made up of independent statutory officeholders from each of Australia's states and territories, as well as National Commissioners from Australia and New Zealand.

ANZCCGA members, individually and collectively, protect and promote the rights, safety, and wellbeing of children and young people across Australia and Aotearoa New Zealand, and advocate for their best interests to be a primary consideration in public policy and decision-making so all children and young people can grow up safe, supported, and able to thrive.

What children and young people need adults to hear

Too many children and young people in Australia are experiencing violence. My submission includes references to harm to children and young people in their own words. We encourage decision-makers to sit with the discomfort and to recognise that, despite progress, there is still much work to do to make Australia safer for all children and young people.

To that end, we join with them and strongly call on public officials to use their influence and authority to make a tangible difference in their lives, to enable them to experience a future free from violence, exploitation, and discrimination.

Jodie Griffiths-Cook

Public Advocate and Children and Young People Commissioner
ACT Human Rights Commission

A child rights approach to preventing violence: Turning the tide for children and young people

Opening statement

The responsibility of the Australian community to protect children and young people is enshrined in the United Nations Convention on the Rights of the Child (UNCRC), as well as policies, plans, and legislation across the Commonwealth, States, and Territories.

My team and I regularly speak directly to children and young people in a range of settings. Their experiences of violence are often at the forefront of the issues they wish to bring to my attention. It is essential that decision-makers recognise that their unique insights, needs, and experiences require different responses to those of adult victim-survivors.

This submission draws on what we have heard directly from children and young people about their experiences of violence in the ACT. It sits alongside what we know from research and evidence regarding violence in Australia. The quotes we have included from children and young people show that violence is a real and present issue for too many children and young people in Australia.

Children and young people have the right to be safe from violence, abuse, exploitation, and neglect. This right is fundamental and is reflected in Australia's obligations under the UNCRC, particularly Article 19, which requires governments to protect children and young people from:

“all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse [...]”¹

While there has been important progress in recognising and responding to violence across Australia, including increased community awareness, stronger policy responses, and greater recognition of victim-survivors, too many children and young people continue to experience violence and harm. The experiences shared with my office demonstrate that, for many children and young people, the benefits of these reforms have not yet translated into consistently safe environments or timely access to support.

Children and young people experience domestic and family violence, child abuse, sexual violence, exploitation, harmful sexual behaviour by siblings and peers, bullying, and technology-facilitated abuse at shocking rates. This is all enabled by systemic failures to protect them and fragmented systems that respond only after violence occurs.

Children and young people consistently tell us they feel overlooked by policies and services designed primarily by and for adults. They want to be listened to, they want to be safe, and they want adults to take responsibility for preventing harm before it happens.

The consultation paper identifies five priority areas for the Second Action Plan. In responding, we have intentionally moved beyond a theme-by-theme analysis and instead present four interconnected strategic priorities.

¹ [Convention on the Rights of the Child text | UNICEF](#)

This approach reflects what children and young people consistently tell us: experiences of violence, safety, healing, and support are deeply interconnected and cannot be effectively addressed through siloed policy responses. The recommendations throughout this submission should therefore be read as contributing across multiple consultation themes.

This submission puts forward four interrelated propositions:

1. Children and young people must be recognised, in their own right, as victim-survivors and rights-holders.
2. Violence can be prevented through earlier and sustained investment in children and young people, families, and communities.
3. Responsibility for violence must remain firmly with those who use violence.
4. Systems must be designed around the rights, needs, and experiences of children and young people rather than institutional boundaries.

Australia will not achieve its ambition of ending violence against women and children unless it addresses violence against children and young people as a distinct and urgent policy challenge and commits to long-term reform that prevents future victimisation and future perpetration.

Strategic priority 1: Recognise children and young people as victims, rights-holders, and partners in reform

We are pleased to note the Commonwealth's commitment to recognising children and young people as victim-survivors in their own right. Actions to respond to their distinct experiences are most effective when viewed through a child rights lens.

The United Nations Committee on the Rights of the Child has consistently emphasised that all forms of violence against children and young people are preventable and that children and young people must be recognised as independent rights-holders and victim-survivors, not merely as witnesses to violence experienced by adults.² Further, actions to prevent violence against children and young people must be informed by Australia's obligations under the UNCRC.

Whether they experience physical, emotional, or sexual violence directly, witness violence within the home, are subjected to coercive control and/or exploitation, or are harmed in online environments, children and young people experience profound impacts that require dedicated responses. Too often, however, children and young people continue to describe service systems that fail to recognise them as individuals with their own needs, perspectives, and recovery journeys.³

As one young person explained:

"They're still going to want to talk to the parents instead of you because they don't see you as you, they see the parents. They look through you."

² [Article 19: Protection from abuse and neglect | CRIN](#)

³ [Listening to Young People's Experience of Family Violence - HRC](#)

Many young people also report significant barriers to seeking help, including concerns about confidentiality, fear of consequences for their family, distrust of systems, and uncertainty about who they can safely approach.

"I can't tell anyone, because it will break up my family."

"People say it's confidential, can't say nothing to nobody, then you go home and your parents get mad at you because of it."

Some children and young people also described a lack of trust in service and statutory systems, including concerns about the consequences of disclosure.

"I don't trust the police, I wouldn't trust the police to help me."

These experiences demonstrate the importance of recognising children and young people as individuals with their own rights, experiences, and perspectives.

We are pleased to see your consultation paper recognises children's and young people's expertise. However, this is more than an "opportunity of the second action plan,"⁴ it is an obligation under Article 12 of the UNCRC. Governments must therefore establish pathways that enable children and young people to have a say on matters that affect them.⁵ This includes them being able to provide their insights about violence, safety, and system failures as this cannot be obtained elsewhere.

Meaningful participation is not simply about seeking the views of children and young people. It requires the creation of safe, inclusive, and genuine opportunities for children and young people to influence decisions that affect them.

For children and young people affected by violence, participation must be trauma-informed and supported in ways that prioritise both safety and wellbeing. Participation and protection should not be viewed as competing priorities. Rather, children and young people are able to participate most meaningfully when they feel safe, respected, and confident that their experiences will be treated with care and acted upon appropriately.⁶

As children and young people regularly remind me:

"I hate that adults don't listen to me."

"I want adults to know that when I'm frustrated no one listens to me."

A child rights-based approach must recognise that children and young people do not experience violence or access support equally. Aboriginal and Torres Strait Islander children and young people, children and young people with disability, neurodivergent children and young people, LGBTIQ+ children and young people, those from culturally and linguistically diverse backgrounds, and those living in rural and remote communities often face additional barriers to safety and support.

⁴ [Section Action Plan consultations - Summary paper](#), page 47

⁵ [Convention on the Rights of the Child text | UNICEF](#)

⁶ Mitchell et al, 'Children's Human Rights to 'Participation' and 'Protection': Rethinking the relationship using Barnahus as a case example. 'Child Abuse Review Volume 32, Issue 6, 2023:7

These barriers are not inherent to these children and young people; they arise from systemic inequities, discrimination, exclusion, geographic disadvantage, and service systems that are not always designed to meet their needs. Creating equitable outcomes requires responses that are culturally safe, accessible, inclusive, and developed in partnership with the communities they are intended to serve.

Importantly, recognising children and young people as rights-holders also means helping them understand where responsibility for violence lies. Too many children and young people internalise responsibility for managing risk, preventing violence, protecting family relationships, or keeping others safe.

“Yeah, my entire life I stayed in the situation to protect my little sisters because I felt like I had to be there to protect them.”

A rights-based approach must communicate clearly and consistently that violence is never the responsibility of the child or young person experiencing it. Responsibility rests with the person using violence.

Recognition and safety are only the beginning of a child's/young person's recovery journey. Children and young people who experience violence require access to sustained healing and recovery supports that recognise the developmental impacts of trauma and the importance of stable relationships, education, culture, community connection, and wellbeing. Too often, support ends once immediate safety concerns are addressed, leaving children and young people to navigate the long-term consequences of violence with limited assistance.

In addition to prevention, a child rights-based approach must ensure that recovery and healing are treated as core outcomes of the National Plan, not secondary considerations. Every child and young person who experiences violence should be able to access timely, developmentally appropriate, and culturally safe therapeutic support, regardless of where they live or which system first identifies their experience of harm.

Recommendations

- 1.** Embed Articles 12 and 19 of the UNCRC as guiding principles to explicitly recognise children and young people as victim-survivors and rights-holders in their own right across policy, legislation, and service delivery, with particular attention to the needs of children and young people experiencing intersecting disadvantage (i.e., Aboriginal and Torres Strait Islander children and young people, children and young people with disability, neuro-divergent children and young people, LGBTIQ+ children and young people, culturally diverse communities, and those living in rural and remote areas).
- 2.** Establish permanent national mechanisms for meaningful participation of children and young people in policy development, implementation, and evaluation.
- 3.** Invest in dedicated child-centred advocacy, service delivery pathways, healing, recovery, and therapeutic supports that reinforce responsibility for violence always lies with the person using violence, not the child or young person experiencing harm.

Strategic priority 2: Break the cycle through prevention and early intervention

Ending violence requires governments to focus not only on responding to harm but also on preventing it. Evidence consistently demonstrates that childhood experiences of violence, abuse, neglect, and trauma are associated with poorer lifelong outcomes, increased risk of future victimisation⁷ and, without effective intervention, increased likelihood of future use of violence.⁸

Without earlier intervention, Australia risks perpetuating an intergenerational cycle that creates more victims, more perpetrators, and increasing social and economic costs. Prevention must therefore become the organising principle of government decision-making. This requires greater focus on the role of adverse childhood experiences, family stress, social disadvantage, online harms, harmful gender norms, and exposure to violence during childhood.

Children and young people themselves consistently identify opportunities to intervene earlier. Many describe receiving information about consent, relationships, sexual safety, and online harms long after exposure to risk has already occurred.

As one young person stated:

"Sex education should be implemented sooner; it can be done in age-appropriate ways. We know that education increases reporting."

Another observed:

"Children aren't too young to be taught sex ed when they're already experiencing rape."

Several children and young people we have spoken to challenged assumptions that discussions about consent, relationships, and sexual safety should wait until adolescence. They argued that education should start early to equip children and young people to identify abuse, seek help, and understand healthy relationships.

Young people have raised concerns about increasing exposure to harmful online content, including misogyny, exploitation, and harmful sexual behaviours. Many challenged approaches focused solely on restricting access rather than addressing the drivers of harm.

Children and young people also raised concerns about early exposure to pornography and other harmful online content, noting its influence on attitudes towards peer relationships, consent, and sexual behaviour. Several young people reflected that they were exposed to sexualised content long before receiving education about healthy relationships, consent, or sexual safety, highlighting the importance of providing accurate, age-appropriate information before harm occurs.

⁷ [Children and young people - Australian Institute of Health and Welfare](#)

⁸ Fitz-gibbon K, Meyer S, Boxall H, Maher J and Roberts S (2022) [Adolescent family violence in Australia: A national study of service and support needs for young people who use family violence - external site opens in new window](#), ANROWS, accessed 17 March 2023.

"The social media ban feels like the same as the abstinence approach to sex education. It is going backwards for safety. Education would be better."

"Why are we punishing children instead of removing the danger? They should go after the perpetrators."

These reflections are particularly important in the context of rapidly evolving technology. Children and young people are increasingly exposed to forms of violence that transcend traditional boundaries between online and offline environments. Technology-facilitated abuse, online exploitation, image-based abuse, deepfakes, coercive control through digital platforms, and exposure to misogynistic and violent online content are no longer emerging concerns. For many children and young people, they are a routine part of navigating the digital world.

This aligns with the consultation paper's identification of technology-facilitated abuse, deepfakes, harmful online content, and online misogyny as growing forms of violence affecting children and young people.⁹

Governments, regulators, technology companies, educators, and service systems all have a responsibility to create safer digital environments, disrupt harmful content and behaviours, hold perpetrators accountable, and equip children and young people with the knowledge and support needed to navigate online spaces safely.

This observation speaks to a broader challenge within violence prevention. Too often, prevention efforts focus on what victims should do to stay safe rather than what governments, institutions, communities, and perpetrators must do to prevent violence from occurring.

Children and young people should not carry responsibility for navigating unsafe environments created by adults. Effective prevention requires early identification of harmful behaviours, intervention with those at risk of using violence, accountability for perpetrators, and action to address environments that enable violence and exploitation.

Recommendations

- 4.** Expand investment in early intervention and family support services before crisis occurs, recognising adverse childhood experiences and childhood trauma as key drivers of future violence.
- 5.** Implement nationally consistent, age-appropriate, and evidence-informed respectful relationships, consent, and sexuality education that explicitly challenges rigid gender norms, and addresses online harms and harmful sexual behaviours.
- 6.** Develop a national approach to preventing online harms, including technology-facilitated abuse, exploitation, misogyny, and harmful sexual behaviours with clear accountability for government, industry, and platform providers.
- 7.** Invest in evidence-based prevention and intervention initiatives that identify harmful behaviours early, interrupt intergenerational cycles of violence, and reinforce accountability for those who use violence.

⁹ [Section Action Plan consultations - Summary paper](#)

Strategic priority 3: Strengthen accountability for people who use violence

While support for victim-survivors is essential, Australia cannot reduce violence by focusing exclusively on helping victims navigate harm after it occurs. A stronger emphasis must be placed on identifying, responding to, and preventing violent behaviour.

Children and young people are highly attuned to where responsibility is placed. When they see systems focus primarily on victim safety planning, behavioural restrictions, risk management, and resilience, they may conclude that preventing violence is the victims' responsibility. This risks normalising violence rather than challenging it.

Children and young people need to see adults, institutions, and governments consistently reinforce the message that violence is not inevitable. Violence is a choice and responsibility always lies with the person using violence.

This principle should inform responses across family violence, child abuse, sexual violence, harmful sexual behaviours, online exploitation, and technology-facilitated abuse. It should also inform broader discussions regarding the appropriateness of continuing to provide legally sanctioned physical punishment of children and young people.

Children and young people are the only group in Australia not afforded equal protection from physical assault under the law.¹⁰ Legal defences that permit physical punishment normalise violence as a response to conflict and reinforce the notion that people with power can use force to control others. A prevention agenda that seeks to reduce future violence must actively challenge messages that legitimise violence against children and young people.

"There's a lot of even adults who don't know the difference between punishment, discipline and abuse."

"My mum used to blame it on tough love."

Efforts to end violence against women and children will be strengthened when governments focus not only on helping victims escape violence, but also on reducing the number of people who use violence in the first place.

National consistency is particularly important in creating child-safe environments. While significant progress has been made through investment in child welfare, along with the establishment of Reportable Conduct and Child Safe Standards Schemes in most jurisdictions, variation in implementation and oversight can create inconsistency in children's and young people's experiences of safety and protection. Greater national alignment would support a more coherent approach to preventing and responding to violence against children and young people.

Recommendations

11. Embed perpetrator accountability as a core principle across all violence prevention and response frameworks, ensuring responsibility for violence remains with those who use it.

¹⁰ Australian Institute of Family Studies (2021). Corporal punishment legislation.
<https://www.aifs.gov.au/resources/resource-sheets/physical-punishment-legislation>

12. Increase investment in evidence-based interventions for people who use violence, including early intervention approaches for harmful sexual behaviour, peer-on-peer abuse, and children and young people at risk of using violence.
13. Develop outcome measures that assess reductions in perpetration, repeat offending and intergenerational violence, alongside measures of victim-survivor safety and wellbeing.
14. Progress legislative reform to remove legal defences that permit physical punishment and explicitly recognise violence against children and young people as incompatible with efforts to end violence against women and children.
15. Harmonise Child Safe Standards nationally and invest in a nationally consistent child-safe, trauma-informed, and violence-informed workforce strategy across education, health, justice, recreation, community services, and care settings.
16. Invest in public awareness, prevention, and parenting initiatives that reinforce accountability for violence, promote non-violent approaches to parenting, and strengthen child-safe cultures.

Strategic priority 4: Build systems designed around children and young people, not institutions

Children and young people experience violence as a whole-of-life issue yet government systems continue to respond through disconnected policy frameworks, funding arrangements, and service structures.

Violence does not fit neatly within the boundaries of child protection, family violence, sexual violence, mental health, education, justice, or online safety systems. Evidence increasingly demonstrates that experiences of violence frequently overlap with experiences of child sexual abuse, mental health impacts, educational disengagement, online exploitation, or other forms of harm.¹¹ Children's and young people's lives do not reflect policy silos, and neither should our service systems. The result is a fragmented experience for children and young people.

As one young person described:

"Every time I got sent somewhere else, or someone left, I had to tell my story again. I had to do that six times."

Others highlighted delays in accessing support:

"Services wait until things are at crisis."

These experiences reflect systemic design failures rather than individual shortcomings. A child or young person experiencing family violence may simultaneously experience sexual abuse, mental health distress, educational disengagement, online exploitation, or homelessness. Existing systems frequently treat these experiences as separate policy problems.

¹¹ Australian Maltreatment Study (2024)

Children and young people should be able to access support through whichever door they enter. Whether a child or young person discloses violence to a teacher, health practitioner, counsellor, youth worker, police officer, or community organisation, they should experience a coordinated and connected response rather than being redirected between services or required to repeatedly re-tell their story.

A genuine “no wrong door” approach would place responsibility on systems to work together around the child/young person, rather than expecting children and young people (and/or their families) to navigate complex service systems on their own. This reflects the consultation paper’s emphasis on stronger service integration, information sharing, and workforce capability as critical enablers of effective responses.¹²

Future reform should focus on creating integrated systems capable of identifying risk earlier, sharing information appropriately, coordinating responses, and measuring outcomes that matter to children and young people. This includes strengthening accountability across systems for identifying and managing risks posed by individuals who cause harm. Children and young people should not be expected to repeatedly navigate fragmented systems while adults debate jurisdictional and institutional responsibilities.

Effective systems depend on a capable workforce. Children and young people frequently disclose experiences of violence to trusted adults outside specialist services, including teachers and other school staff, health practitioners, youth workers, sporting coaches, and community workers.

These workforce groups are often the first to recognise concerns or hear disclosures, yet their confidence, capability, and access to support can vary considerably.

National harmonisation of Child Safe Standards also presents a practical opportunity to strengthen prevention, accountability, and consistency across jurisdictions and sectors. This would help establish clear expectations for child-safe cultures regardless of where children and young people access services, education, recreation, or care.

Building a child-safe, trauma-informed, and violence-informed workforce should be a core component of national reform efforts. This includes equipping professionals across all sectors to identify risks earlier, respond appropriately to disclosures, understand the impacts of trauma, and support children and young people to access help. Workforce wellbeing must also remain a priority, recognising the impact of vicarious trauma on those working directly with victim-survivors and children and young people exposed to violence.

To achieve meaningful and sustained reform, Australia should adopt a long-term, whole-of-government National Plan for Children and Young People that aligns existing strategies and creates shared accountability for outcomes.

Recommendations

- 18.** Develop a long-term National Plan for Children and Young People that strengthens alignment between violence prevention, child protection, child sexual abuse, and child wellbeing frameworks.

¹² [Section Action Plan consultations - Summary paper](#)

19. Improve information sharing and risk identification mechanisms across jurisdictions and sectors.
20. Establish integrated child-centred service pathways that deliver a genuine “no wrong door” response, reducing re-traumatisation, duplication, and the need for children and young people to repeatedly tell their story.
21. Success should not be measured solely by reductions in violence. Governments should also measure whether children and young people feel safer, experience improved wellbeing, recover from trauma, remain engaged in education and community, and are supported to thrive following experiences of harm.
22. Strengthen oversight and accountability mechanisms that monitor and respond to child safety risks to children and young people and establish shared national accountability for outcomes relating to children’s rights, safety, and wellbeing.

Conclusion

Australia cannot end violence against women and children while children and young people continue to be expected to manage risks created by others. Children and young people are telling us what needs to change. The UNCRC outlines the government’s obligations to bring about the change required.

They are asking to be heard, to be protected, and for adults to take responsibility.

Ending violence requires more than just strengthening responses after harm occurs. It requires governments to make the long-term decisions necessary to prevent violence before it happens, address the drivers that create future perpetrators, intervene earlier when risks emerge, and build systems that place children’s rights, safety, and wellbeing at their centre.

This requires a child rights-based approach that recognises children and young people as rights-holders, invests in prevention, demands accountability, and delivers coordinated action across governments, systems, and communities.