

From response to prevention

Five opportunities for national leadership to better protect and support children and young people

Joint submission by the Australian Childhood Foundation for:

Second Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse (2021–2030)

Second Action Plan under the National Plan to End Violence Against Women and Children (2022–2032)

July 2026



Acknowledgements

The Australian Childhood Foundation acknowledges Aboriginal and Torres Strait Islander peoples as the traditional custodians of this land and we pay our respects to their Elders past, present and children who are leaders in their own right.

We acknowledge the traditional custodians of this Country, the histories and living Cultures and the many thousands of years in which First Nations peoples have raised their children to be safe and strong. We recognise it is the oldest continuous living Culture in the world and that sovereignty has never been ceded.

We also acknowledge children and young people and adults with lived and living experience of child abuse as rights and knowledge holders in their own right with inherent wisdoms as to what helps, what harms and what is needed.

Language

Child Abuse

For the purposes of this document the term child abuse will be used to include child abuse in all its forms – physical, emotional and sexual abuse, neglect, experiences of family violence, online and offline exploitation.



Five opportunities for national leadership



The next step belongs to us.

Australia now has the evidence, the expertise and the momentum to act. What children and young people need next is national leadership.

The Australian Childhood Foundation believes these five steps would fundamentally transform how Australia prevents abuse, responds to harm, supports healing and creates the conditions for children and young people to experience a safe childhood.

Five opportunities for national leadership

1

Prevention: Create a national system of leadership and accountability for children and young people through prevention

2

Rights: Respond to children and young people as victims in their own right

3

Young people harmed and harming: Transform responses to young people who have experienced harm and who are using harm

4

Online harm: Protect childhood by preventing and responding to online harms

5

Healing: Build a trauma-transformative system



Executive Summary

The Australian Childhood Foundation welcomes the opportunity to contribute to the Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse (2021–2030)* and the *Second Action Plan under the National Plan to End Violence Against Women and Children (2022–2032)*.

This submission brings these consultations together because children and young people do not experience violence, abuse and trauma through government portfolios. Their experiences do not fit neatly within policy boundaries, and neither should the systems designed to protect them.

Over the past decade, Australia has made significant progress in responding to child abuse and strengthening child safe organisations. Yet the Australian Child Maltreatment Study reminds us that child abuse remains widespread, interconnected and deeply harmful, with lifelong impacts on health, education, relationships, employment, justice, productivity and wellbeing. These impacts extend far beyond childhood, affecting every part of society and every area of government.

Children and young people have already shown extraordinary courage. They have disclosed abuse, participated in inquiries, shared their lived experiences, challenged systems that failed them and repeatedly told governments what safety, healing and justice require. Their voices have shaped many of the reforms achieved to date.

The question is no longer whether we know what needs to change.

The question is whether we are prepared to change the systems around children.

The Australian Childhood Foundation believes Australia has reached an important turning point. The next generation of reform cannot simply strengthen our response to abuse after it occurs.

This submission presents five opportunities for national leadership that we believe must be included into the second action plans to ensure the safety and wellbeing of all Australian children and young people:

1. Prevention: Create a national system of leadership and accountability for children and young people through prevention

Responsibility for children's safety remains fragmented across portfolios, strategies and funding streams. Preventing abuse before it occurs requires national leadership and clear accountability, with children at the centre of government decision-making.

2. Rights: Respond to children and young people as victims in their own right

Children and young people are still too often treated as dependants of an adult victim-survivor or secondary clients of adult services, leaving many without a clear pathway to support. Every child and young person, whether supported alongside family or seeking help alone, needs developmentally appropriate support before, during and after crisis.

3. Young people harmed and harming: Transform responses to young people who have experienced harm and who are using harm

Effective responses must hold both accountability and victimisation together, recognising that childhood vulnerability and harmful behaviour can coexist. Prevention strategies should avoid applying adult frameworks of perpetration to children and instead recognise their developmental needs, rights and capacity for healing and change.

4. Online harm: Protect childhood by preventing and responding to online harms

Children experience one world across physical and digital environments, and harm increasingly moves between them. Protecting childhood requires shared responsibility across government, families, communities and industry.

5. Healing: Build a trauma-transformative system

Understanding trauma is not enough. Systems must actively create safety, connection, belonging, healing and recovery for children, young people and families, and strengthen the capability and wellbeing of the workforce around them.

Next steps

These changes are ambitious, but they are practical and achievable. Many build on existing evidence, the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, Australia's commitments under the United Nations Convention on the Rights of the Child, and the expertise of children, young people, adults with lived and living experience, practitioners and organisations working every day to keep children safe.

Children have already done the hard part. They have trusted adults with their stories and shown remarkable courage in helping Australia understand what needs to change.

The opportunity now rests with governments to demonstrate national leadership by creating a coherent child safeguarding system that not only responds to abuse, but prevents it, strengthens safeguarding across society and enables every child and young person to experience a safe childhood.



One childhood, one submission



*Meaningful change demands we hold the complexity of the
challenge we face*

Children experience one childhood

Child abuse affects more than 62% of Australian children and young people in some form, with too many experiencing multiple forms of abuse.¹

The nature of abuse is also changing. The risks of online exploitation are escalating rapidly with a 41% increase in reports in the last year alone.² Perpetrator profiles are diversifying, with abuse occurring in familial, digital, community and institutional settings.

The challenge is not only broadening in scale but deepening in complexity. Many children and young people experience heightened vulnerability because of broader systemic forces including racism, discrimination and exclusion. Increasing tendencies to problematise children and young people in areas such as education, youth justice, out of home care and housing sees them too often framed as problems to be controlled rather than rights-holders with strengths, holding unmet needs as a result of abuse and exploitation and with the capacity, given enabling conditions to positive contributors. This deficit lens fuels narratives, policies and practices that emphasise surveillance and regulation denying children and young people their rights to dignity, participation, protection and belonging. It ignores the structural conditions that place children and young people at risk, shifting attention toward individual behaviour rather than the relationships, environments and systems that fail them.

The impact of child abuse is devastating and long-lasting. In addition to the human cost to children, young people and families, child abuse causes significant current and downstream social and economic costs to our society.

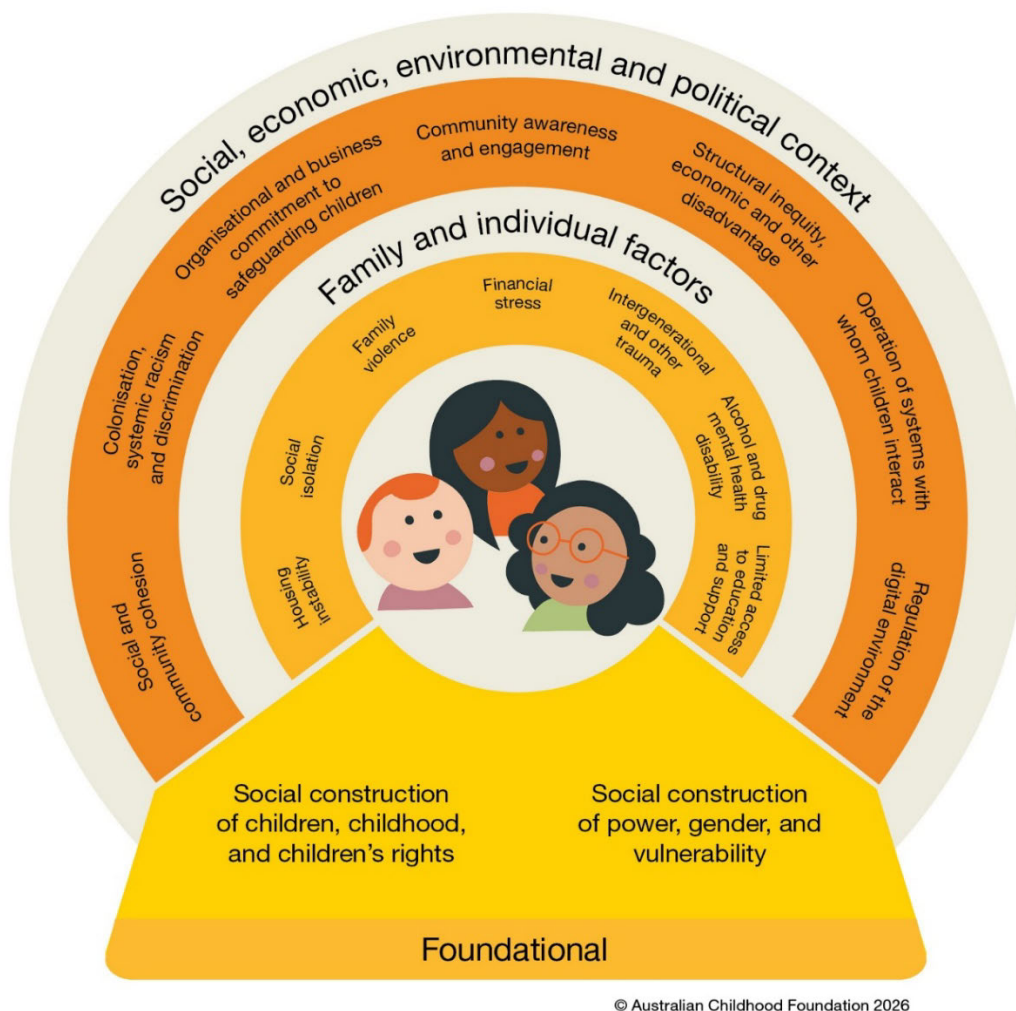
Child abuse and the trauma it causes are deeply systemic. Solutions are not definitive or universally applicable; they must be adaptive, contextually sensitive and informed by learning and experimentation. Interventions require the integration of multiple forms of knowledge - practice,

¹ Mathews, B., Pacella, R. E., Scott, J. G., Finkelhor, D., Meinck, F., Higgins, D. J., Erskine, H. E., Thomas, H. J., Lawrence, D. M., Haslam, D. M., Malacova, E., & Dunne, M. P. (2023). The prevalence of child maltreatment in Australia: findings from a national survey. *Medical Journal of Australia*, 218 (6 Suppl): S13-S18.
<http://dx.doi.org/10.5694/mja2.51873>

² <https://www.accce.gov.au/news-and-media/news/41-cent-jump-online-child-sexual-exploitation-reports-underscores-need-whole-community-approach>

cultural, academic and from those with lived and living experience alongside collaboration across sectors, disciplines and communities.

Child abuse is shaped by broad social, economic, political and structural conditions that create environments where risk and vulnerability accumulate and are compounded by family and individual factors that may exist. These are represented in the diagram below.



Critically (and often missed in considering the determinants of child abuse strategy and solutions) is the way society constructs children, young people and childhood itself can unintentionally undermine their protection by positioning them as passive and dependent rather than as rights-holders with agency and insight into their own lives. These constructions can also obscure the structural conditions that place children and young people at risk, shifting attention toward individual behaviour rather than the environments and systems that fail them. As a result, protective responses can become adult-centred and paternalistic.

These constructions, combined with language frames used to talk about children and young people that serve to stigmatise and marginalise, and the widespread problematisation of children and young people as risky or troublesome, render them invisible or silent in systems designed to protect them and shape how institutions respond, whose voices are heard and whose rights are upheld.

Equally, we acknowledge the systemic racism and discrimination that creates structural conditions that heighten the risk of child abuse and exploitation by undermining access to safety, support and justice for marginalised children and young people. Discriminatory narratives can

lead to the over-surveillance and criminalisation of children, young people and their families, particularly those from First Nations communities, increasing their exposure to systems that harm rather than protect. These dynamics compound trauma, erode trust in services, and perpetuate cycles of harm.

Risk is further intensified by low level community awareness and engagement with the issue of child abuse, organisations who fail to safeguard children and young people, legal systems that dismiss or discount their perspectives, at times failing to render them protection and/or justice, and the rapidly evolving digital environments that expose children and young people to new forms of abuse and exploitation.

Child abuse rarely occurs in isolation. Experiences of child sexual abuse, family violence, emotional abuse, physical abuse and neglect commonly overlap, reinforcing the need for integrated policy responses that reflect children's lived realities rather than administrative boundaries.

These intersecting experiences also reflect a broader challenge. Children's rights are still not consistently understood, upheld or prioritised across Australian society. The prevalence of child abuse requires us to confront an uncomfortable truth: children continue to be one of the most marginalised groups in decisions that affect their lives. Lasting change will not come from addressing individual forms of abuse in isolation. It requires transforming the systems, cultures and environments that allow abuse to occur in the first place.

Yet governments frequently respond through separate strategies, funding streams, legislation and service systems that can unintentionally fragment children's experiences and the solutions designed to support them. We must move beyond the singular problem definitions that sit within a multitude of plans, strategies and funding siloes and consider the complexity of co-occurring and multi-abuse experiences that is the lived experience of too many children and young people, that can be further compounded by the way we construct children and young people and de-centre their needs in the process.

The Australian Childhood Foundation approaches this work through the lens of child safeguarding. Safeguarding is broader than responding to individual incidents or forms of abuse. It asks a more fundamental question: *What conditions allow children to be harmed, and what conditions enable them to be safe, heard and able to thrive?*

This perspective recognises that while different forms of abuse may require different responses, they often arise from common systemic, organisational and societal conditions. Likewise, many of the solutions are shared: embedding children's rights, strengthening safeguarding capability, creating child safe cultures, investing in prevention, supporting healing and ensuring children and young people are genuinely heard in decisions that affect them.

For this reason, this submission does not seek to allocate every issue or recommendation to one Action Plan or the other. Instead, it presents a coherent approach to strengthening Australia's child safeguarding system. Many of the reforms proposed will advance both Action Plans because they respond to the realities of children's lives rather than the structures of government.

In the words of the late [REDACTED], former CEO of the Australian Childhood Foundation:



“A system that is truly child serving will be a system that is listening to children and willing to make the changes to itself in order to meet the needs of those children”.

This must be the test of both Second Action Plans.

Children, young people and adult survivors have already shown extraordinary courage. They cannot continue to be asked to revisit their experiences without meaningful action in return. Consultation must never become another form of trauma mining.

Australia now has an opportunity to respond differently. By placing children at the centre of government, rather than expecting children to navigate fragmented systems, these Action Plans can become more than separate policy initiatives. Together, they can lay the foundations for a nationally coordinated child safeguarding system that prevents abuse, supports healing and ensures every child and young person can experience a safe childhood.



Overview of recommendations

The following brings together recommendations made across the five national leadership opportunities.

Opportunity 1: Create a national system of leadership and accountability for children and young people through prevention

1. Establish a Commonwealth Minister for Children and an Office for Children
2. Introduce a Child Safeguarding Positive Duty
3. Embed Child Impact Assessments across Commonwealth decision-making
4. Harmonise Working with Children Check systems nationally
5. Coordinate national child safeguarding reform
6. Report publicly on child safeguarding and prevention outcomes

Opportunity 2: Respond to children and young people as victims in their own right

1. Fund and implement the National Model of Care
2. Commission accessible responses for children and young people in every region
3. Establish dedicated and transparent investment for children and young people experiencing family violence
4. Remove the financial, housing and practical barriers that prevent children and young people from reaching safety
5. Embed children and young people in the governance of the National Plan to End Violence Against Women and Children
6. Report publicly on implementation, access, unmet demand and outcomes for children and young people

Opportunity 3: Transform responses to young people who have experienced harm and who are using harm

1. Apply a child-centred lens alongside gendered analysis
2. Recognise boys as victim-survivors in family violence responses
3. Respond to children and young people who use harm as children first
4. Establish a national framework for Adolescent Violence in the Home programs
5. Reform language, policy and practice frameworks to reflect children's development, victimisation and capacity for change

Opportunity 4: Protect childhood by preventing and responding to online harms

1. Invest in practical online safety education and support for children, families and communities
2. Establish accessible advice and support services for parents and carers
3. Strengthen collaboration across government, industry, services and communities
4. Invest in prevention, research and evaluation of online harms
5. Adequately resource the eSafety Commissioner to prevent and respond to harm

Opportunity 5: Build a trauma-transformative system

1. Shift Australia's policy and service response from trauma-informed to trauma-transformative, embedding healing, recovery, connection and belonging as core objectives across all child and family systems.
2. Develop a national workforce capability framework that embeds safeguarding, trauma, child development and responding to abuse across all professions working with or around children.
3. Invest in workforce wellbeing through supervision, reflective practice, trauma support and professional development to strengthen workforce sustainability.
4. Ensure universal and specialist services are culturally safe, accessible and co-designed with Aboriginal and Torres Strait Islander communities and other priority populations.



National Leadership Opportunity 1

Create a national system of leadership and accountability for children and young people through prevention

Preventing child abuse requires more than responding earlier. It requires governments to create the conditions in which abuse is less likely to occur in the first place. It also requires clear recognition that, into many cases, the abuse of children constitutes a crime and they deserve the same level of protection under the law, in their own right, as do women and other groups who experience vulnerability.

Australia has made significant progress in strengthening responses to abuse once it has occurred. Yet the Australian Child Maltreatment Study reminds us that child abuse remains widespread and that its impacts are lifelong, affecting health, education, mental health, housing, justice, employment, productivity and community wellbeing. Child abuse is not solely a child protection issue. It is a national social, economic and public health issue that requires coordinated leadership across every portfolio of government.

Children do not experience government through portfolios. Their safety is influenced by decisions made across education, health, disability, justice, digital regulation, housing, social services, sport, immigration, climate and the economy. Yet responsibility for children's safety remains fragmented across multiple strategies, funding streams and agencies. While individual reforms have strengthened parts of the system, Australia still lacks a coordinated national approach to preventing abuse before it occurs.

The Australian Childhood Foundation believes prevention must become the organising principle of Australia's child safeguarding system. Prevention requires governments to move beyond responding to individual incidents of abuse and instead identify, assess and address the systemic, organisational and societal conditions that create opportunities for harm. This means embedding children's rights into decision-making, strengthening accountability across government, investing earlier in safeguarding capability and creating environments where children can feel safe and be safe.

One of the opportunities to strengthen prevention is through building the capability of the adults who work with and around children. Working with Children Checks are an important component of Australia's child safeguarding system, but prevention requires more than screening individuals when they enter the workforce. While Working with Children Checks are an important component of Australia's child safeguarding system, they were never designed to prevent abuse in isolation. A screening check cannot ensure that an adult understands grooming behaviours, recognises indicators of abuse, maintains appropriate professional boundaries, responds appropriately to disclosures or actively contributes to a child safe culture.

The Australian Childhood Foundation welcomes the Victorian Government's commitment to introduce mandatory child safeguarding education linked to the Working with Children Check.

However, children should not receive different levels of protection depending on where they live.

Consistent with the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, the Commonwealth should work with states and territories to establish a nationally harmonised Working with Children Check system that combines consistent screening, information sharing and continuous monitoring with mandatory, evidence-informed safeguarding education. By expanding Working with Children Checks from a screening and compliance mechanism into a broader safeguarding capability mechanism, Australia can strengthen the confidence and competence of adults working with or around children and enhance our national approach to prevention.

Australia has made progress in strengthening responses to child abuse, particularly following the Royal Commission into Institutional Responses to Child Sexual Abuse. However, much of this reform has focused on improving responses after harm has occurred. While early intervention has expanded, comparatively less investment has been directed towards strengthening safeguarding capability, reducing risk and preventing abuse before children experience harm with the exception of the National Principles for Child Safe Organisations and the One Talk at a Time Campaign.

The reality is that responsibility for prevention remains fragmented across government. Multiple national strategies contribute to children's safety, yet responsibility is dispersed across portfolios, agencies and funding streams. This can result in duplication, gaps in accountability and missed opportunities to address the common conditions that place children at risk. Preventing child abuse requires coordinated national leadership that places children's rights, safety and wellbeing at the centre of government decision-making.

Safeguarding is not yet consistently understood as a whole-of-society responsibility. Every organisation that works with, serves or impacts children has a role in identifying, assessing and preventing foreseeable risks arising from its people, services, environments, products and operations. Preventing abuse cannot remain the responsibility of child protection and specialist services alone. It requires governments, organisations, businesses and communities to create environments in which children and young people feel safe and are safe.. Recognising this, the Australian Childhood Foundation established On Us: The Australian Business Coalition for Safeguarding Children to support businesses to understand and strengthen their role in preventing harm. Working alongside organisations including Westpac, IHG Hotels & Resorts, TikTok, GPT Group and OBE Organic, the Coalition has demonstrated that businesses are willing to embrace safeguarding when provided with practical guidance, leadership and opportunities to collaborate.

Together, the Australian Childhood Foundation and Coalition members have co-designed the Child Safeguarding in Business Principles providing an evidence-informed framework for embedding children's safety into governance, organisational culture, risk management, procurement, products and services, physical and digital environments and corporate decision-making.

This work demonstrates that safeguarding is not simply a child-serving sector responsibility—it is an organisational responsibility. It also provides a strong foundation for a Federal Child Safeguarding Positive Duty, requiring organisations to proactively identify, assess and prevent reasonably foreseeable risks to children arising from their people, products, services, environments, customers, supply chains and operations.

Finally, preventing abuse requires sustained national leadership. Without coordinated governance, transparent accountability and long-term investment, prevention efforts risk remaining fragmented

and reactive rather than strategic and systemic. Australia's next phase of reform should shift prevention from being one part of the system to becoming the organising principle of a national child safeguarding system.

Therefore, the second action plans must create a national system of leadership and accountability for children and young people through prevention. To achieve this, the plans should:

1. Establish a Commonwealth Minister for Children and an Office for Children

Create a Commonwealth Minister for Children supported by an Office for Children to coordinate children's policy across government, embed the United Nations Convention on the Rights of the Child in decision-making, oversee implementation of national child-related strategies and strengthen accountability for children's safety, wellbeing and development.

2. Introduce a Child Safeguarding Positive Duty

Introduce a legislated Child Safeguarding Positive Duty requiring organisations across all sectors to proactively identify, assess and prevent foreseeable risks to children arising from their people, services, environments, products and operations, rather than relying primarily on incident-based responses and build into the legislation the requirement of the e-Safety Commissioners Safety-by-Design principles.

3. Embed Child Impact Assessments across Commonwealth decision-making

Require Child Impact Assessments for significant Commonwealth legislation, policy and funding decisions to ensure children's rights, safety and wellbeing are routinely considered across all portfolios.

4. Establish a nationally harmonised Working with Children Check system

Continue to work with States and Territories to encourage the introduction of mandatory safeguarding education within the Working with Children Check as Victoria has undertaken, one which is child and survivor led.

5. Coordinate national child safeguarding reform

Ensure the Office for Children coordinates implementation of the National Strategy to Prevent and Respond to Child Sexual Abuse, the National Plan to End Violence Against Women and Children and other relevant Commonwealth strategies, reducing duplication and strengthening collective impact.

6. Report publicly on prevention outcomes

Publish an annual State of Australia's Children report that tracks national progress in child safety, safeguarding capability, prevention investment and children's wellbeing, providing transparent accountability to Parliament and the Australian community.



National Leadership Opportunity 2

Respond to children and young people as victims in their own right

Australia no longer lacks evidence that children and young people experience family, domestic and sexual violence as victim-survivors in their own right. The unresolved failure is that this recognition has not yet been translated consistently into legislation, funding, commissioning and services designed to respond directly to them.

Children and young people are still too often treated as dependants of an adult victim-survivor, secondary clients of adult services or risks to be managed by child protection. This leaves many without a clear pathway to support - particularly those seeking help without a protective parent or caregiver, living in regional and remote communities, or moving between family violence, homelessness, health, education, justice and statutory systems.

The Second Action Plans must therefore move from recognising children and young people to implementing the systems and responses required to uphold their rights, safety, healing and long-term wellbeing.

A substantial and consistent body of evidence has identified four connected system gaps:

1. **Systems remain designed around adults.** Children and young people are not consistently assessed, supported or funded as primary clients with distinct safety, recovery and justice needs.
2. **Access depends on where a child presents and who accompanies them.** There is no consistently available pathway for children and young people to receive support before, during and after crisis, particularly when they seek help without a protective adult.
3. **Safety is undermined by practical and structural barriers.** Inadequate income, housing and age-appropriate support can leave young people with no viable alternative to homelessness, unsuitable adult services or returning to violence.
4. **Responsibility remains fragmented.** Without dedicated investment, coordinated commissioning, lived experience governance and public reporting, children and young people can remain visible in policy while peripheral to implementation.

The Second Action Plans should:

1. Fund and implement the National Model of Care

Release the National Model of Care and establish a funded implementation agreement with states and territories, setting out responsibilities and accountability across universal, specialist and community settings.

Implementation should use the Model's maturity framework to establish a baseline of current capability, identify gaps in access by region and guide staged improvement across family violence, health, education, housing and homelessness, mental health, child protection, police, justice, income support and out-of-home care systems.

2. Commission accessible responses in every region

Use the National Model of Care to establish a clear service expectation for children and young people experiencing family, domestic and sexual violence in every region.

Governments should strengthen existing services where they can meet the Model and commission additional child- and youth-specific capacity where gaps remain. This must include specialist case management, crisis and practical assistance, safety planning, advocacy, therapeutic recovery, peer support and culturally grounded healing. Commissioning should draw upon models showing promise, like the Amplify model.

Responses must be available to children and young people whether they seek help independently, alongside a safe parent or caregiver, in out-of-home care or while moving between service systems.

3. Establish dedicated and transparent investment

Create a distinct investment and commissioning stream for children and young people under the Second Action Plans, rather than relying on adult family violence, child protection, homelessness or mental health funding to respond indirectly to their needs.

Funding decisions and expenditure should be publicly reported by jurisdiction and region, including what has been invested, which responses are available, who is accessing them and where unmet need remains.

4. Remove the practical barriers that prevent children and young people reaching safety

Align implementation of the National Model of Care with reforms to income support, crisis assistance and youth housing so that children and young people are not prevented from leaving violence because they cannot independently access money, accommodation or essential services.

This should include safe pathways to Commonwealth income support without requiring contact with the person using violence, access to the Leaving Violence Program for young people experiencing familial violence and increased investment in dedicated, age-appropriate youth housing connected to voluntary support.

5. Embed children and young people in governance and accountability

Establish an ongoing, accessible and appropriately remunerated national mechanism through which children and young people can shape implementation of the National Model of Care and the Second Action Plans.

Require annual public reporting under the National Plan on implementation progress, regional service availability, access, unmet demand, continuity of support and outcomes for children and young people. Reporting must include the experiences of children seeking help without a protective parent or caregiver and be disaggregated by age, location and intersecting identities.



National Leadership Opportunity 3

Transform responses to young people who have experienced harm and who are using harm

In the context of family violence

The Australian Child Maltreatment Study (ACMS) shows us that boys are not immune from the devastating impacts of family violence. It found that, as children, young men and young women reported similar rates of exposure to domestic violence and physical abuse. Boys are victims too.

That statement should be obvious. Yet too often, in our public conversations about family violence, it is not. We must therefore be careful about how we frame boys and how we frame the actions we take next. Our language slips between “women and children”, “women and girls”, “men and boys”. Each slip having significant consequences for boys who are similarly victims of family violence. Too often children fall off the end of that sentences about women altogether.

Increasingly, we talk about men and boys as the place to begin solving the crisis of family violence. We talk about women and girls as those who need protection.

When boys are included, they are frequently positioned beside men. We say “men and boys” as though they form a single group. As though a four-year-old boy, a twelve-year-old boy, a sixteen-year-old boy and a grown man occupy the same moral category. They do not. Boys are children.

Yet when we look at boys only through the lens of the men they might become, we miss the children they already are and the victimisation they experience have experienced at the hands of people who use violence in the home.

They are children who are frightened in their own homes. Children who lie awake listening to arguments and threats. Children who are trying to protect themselves, their siblings, and often their mother. Children whose understanding of relationships is being shaped by fear, coercion, control and violence long before they have any power to influence the conditions around them.

This is what happens when boys are adultified. Their pain is treated as a warning sign before it is treated as a wound. A frightened boy becomes “angry”. A traumatised boy becomes “aggressive”. A child who has survived violence becomes a future risk to be managed. The lens shifts from understanding what has happened to him, to worrying about what he might become. And all the while, the adult who used violence may never have been properly held responsible.

Increasing in family violence prevention policy, we are seeing legitimate externalising trauma-based behaviours exhibited by boys who have experienced of family violence de-legitimised and positioned as the early indicators of violent behaviour towards women. We have seen a proliferation of programs seeking to address adolescent violence in the home towards their parent, where the focus is on positioning the young person as a perpetrator of violence and the intervention targeting behaviour change. The Australian Childhood Foundation runs specialist family violence counselling programs in a number of states and territories, in addition to adolescent violence in the home programs and harmful sexual behaviour programs. Throughout all of this work we hold children and young people’s victim experiences as well as supporting

them to take steps towards accountability for unsafe behaviours. We do not deny their victimhood but rather see prevention efforts grounded efforts to support healing from their own abuse and violation.

Accountability matters. But we must be careful not to place the burden of accountability for violence onto boys before adults have taken accountability for the violence they have experienced. When we focus exclusively on changing boys' behaviour without acknowledging their victimisation, we risk asking children to carry responsibilities that belong to the adults and systems around them.

Boys who are harmed, abused or killed in the context of family violence are not an uncomfortable complication to that analysis. They are part of it. They are children with rights, needs, relationships and lives that should have been protected.

Recognising boys as victim-survivors does not weaken our commitment to women and girls. Nor does it diminish the experiences of gender-diverse children. In fact, it requires us to deepen our commitment to all children by recognising that violence harms children in different ways, and that all children deserve to be seen and responded to in the fullness of their experience.

A gendered analysis of violence remains essential. Men's violence against women and children is a national crisis. The role of power, entitlement, coercive control and misogyny must continue to be named, understood and challenged. However, we must ensure national policy, prevention strategies, funding and service responses recognise that, while a gendered analysis remains essential to understanding violence against women and children, children's experiences cannot be understood through gender alone. Responses must acknowledge that girls, boys and gender-diverse children can all be victim-survivors of family violence, child abuse and exploitation, and that children's experiences are shaped not only by gender, but also by their developmental stage, dependency on adults, relationships, disability, culture, neurodiversity and broader social conditions. Policy and practice frameworks should avoid collapsing boys into the category of men or treating girls only through the lens of future victimisation, ensuring that all children are recognised first as children with rights to protection, participation, healing and recovery

The answer is not to stop prevention work with boys. The answer is to stop making prevention the first and only way we see them.

Just as girls and gender-diverse children do, boys need systems that recognise them as victim-survivors in their own right. They need systems capable of seeing both their vulnerability and their strength, both their pain and their potential. Most importantly, they need us to stop confusing childhood with manhood.

And if our national response to violence against women and children cannot hold that truth, then it risks failing the very children it seeks to protect.

In the context of harmful sexual behaviour

In the more than 25 years that the Australian Childhood Foundation has been delivering specialist, evaluated treatment services for children and young people who engage in harmful sexual behaviour we know that these children and young people have invariably been exposed to family violence and a range of other forms of abuse and neglect, and likely lived in environments where they have had access to pornography and other explicit adult sexualised behaviour.

Many of these children and young are victims as well as engaging in unsafe behaviour and similar to the context described above must have their victimhood acknowledged whilst supported to take accountability for their unsafe behaviours.

Analysis from the Australian Child Maltreatment Study found that, among perpetrator classes for childhood sexual abuse, other known adolescents, excluding current or former romantic partners, were the most commonly reported perpetrator group, reported by 10.0% of participants. This was higher than parents or caregivers in the home at 7.8%, and other known adults at 7.5%.³ Whilst these findings are concerning we must be careful not to conflate peer-on-peer harmful sexual behaviour between young people with behaviour from an older child or young person directed to a much younger child. These are not peer relationships. These are substantively different problems requiring differentiated responses.

As noted by the Royal Commission into Institutional Responses to Child Sexual Abuse⁴ the term 'harmful sexual behaviours' covers a broad spectrum of behaviours that can range from those that are developmentally inappropriate and harm only the child exhibiting the behaviours, such as compulsive masturbation or inappropriate nudity, to criminal behaviours such as sexual assault. The spectrum of harmful sexual behaviours and the diversity of children's backgrounds and circumstances mean that no one response or intervention is suitable for all children with harmful sexual behaviours. The Commission identified the need for a range of interventions, from prevention and early identification through to assessment and therapeutic intervention. For a small group of children and young people, a child protection or criminal justice response may be necessary.

The Royal Commission also highlighted that childhood behaviours do not mean a person is an inevitable adult offender or a "paedophile in waiting". Children and young people engaging in harmful sexual behaviours do not often go on to become adult offenders the likelihood that a child convicted of a sexual offence will ever be convicted of a second offence is just 2 – 3%. Additionally, less than 10% of adults who commit acts of child sexual abuse were offenders as juveniles (Der Bedrosian, 2018).⁵

The strategies must hold the complexity of this issue and the differentiated ways in which the problem sets within is care understood. Consistent with this language frames are critical. Language such as perpetrators and offenders most commonly used in the context of adult offending, are powerful forces that shape the positioning of policy and system design. These should be avoided in the context of harmful sexual behaviour unless there is clear reason to attribute this language to older young people to have committed criminal offences.

Therefore, the second action plans must protect childhood by addressing the positioning of boys and young men. To achieve this, the plans should:

1. Apply a child-centred lens alongside gendered analysis

Require Commonwealth-funded family violence, prevention and child safeguarding initiatives to apply a child-centred analysis alongside a gendered analysis of violence. This should recognise that boys, girls and gender-diverse children may all experience violence, coercion, abuse and exploitation, and that children's developmental needs, experiences of victimisation and dependency on adults cannot be fully understood through adult gender frameworks alone.

³ Mathews, B., Finkelhor, D., Pacella, R., et al. (2024). Child sexual abuse by different classes and types of perpetrator: Prevalence and trends from an Australian national survey. *Child Abuse & Neglect*, 147, 106562.

⁴ Royal Commission into Institutional Responses to Child Sexual Abuse (2017). Final Report Children with harmful sexual behaviours, Volume 10.
https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_10_children_with_harmful_sexual_behaviours.pdf

⁵ Der Bedrosian, J. (2018). When the abuser is a child, too. *John Hopkins Magazine*, Spring 2018. Retrieved from: <https://hub.jhu.edu/magazine/2018/spring/children-who-are-child-sexual-abusers/>

2. Recognise boys as victim-survivors in family violence responses

Ensure family violence prevention, policy and service responses explicitly recognise boys as children and victim-survivors in their own right. Prevention strategies should avoid positioning boys primarily through the lens of future perpetration and instead address their immediate needs for safety, protection, recovery and healing.

3. Recognise children and young people who use harm as children first

Ensure national policy, funding and practice frameworks recognise that children and young people who use violence, coercion or harmful sexual behaviour may also be victim-survivors of family violence, child abuse, exploitation, neglect and trauma. Responses should hold accountability and victimisation together rather than positioning them as mutually exclusive.

4. Develop a national framework for Adolescent Violence in the Home programs

Develop and implement a national evidence-informed framework for Adolescent Violence in the Home that prioritises the safety of all family members while recognising children's developmental needs, trauma histories, disability, neurodiversity and lived experiences of violence. The framework should move beyond adult perpetrator models and support healing, accountability, relationship restoration and long-term wellbeing.

5. Reform language, policy and practice frameworks

Ensure language used in relation to children and young people distinguishes clearly between children and adults. Terms such as "offender", "perpetrator" and "future perpetrator" should be applied cautiously and only where appropriate, recognising the developmental status and rights of children and young people.



National Leadership Opportunity 4

Protect childhood by preventing and responding to online harms

Children and young people are now growing up in a digital world. They learn, play, build friendships, explore identity, seek support and form relationships across both physical and digital environments. For children and young people, there is increasingly little distinction between what happens online and what happens offline. Experiences move between the two, and harm that begins in one environment can rapidly continue or escalate in the other.

Australia's approach to child safeguarding must reflect this reality.

Online safety cannot sit separately from children's development, relationships, family life or broader safeguarding systems. Children need to be supported to play, learn, make mistakes, develop relationships and grow safely across all the environments they inhabit.

Technology provides significant opportunities for participation, learning, creativity and connection. However, it has also created new pathways for grooming, child sexual abuse, image-based abuse, coercion, exploitation and technology-facilitated violence. Children and young people are also increasingly exposed to digital content and environments that shape their understanding of relationships, identity, success, appearance and belonging.

The challenge is not to remove children from the digital world. It is to ensure the digital world supports a safe and healthy childhood.

Children are growing up with digital technology embedded into almost every aspect of their lives. However, many parents, carers and professionals were raised without this technology or experienced its introduction only later in childhood or adulthood. This creates a significant knowledge and confidence gap. Children and young people can know more about the platforms, language and technology they use than the adults responsible for supporting and protecting them.

Digital literacy should therefore be recognised as a core domain of child development.

Just as children are supported to develop physical, emotional, social, cognitive and relational skills, they need age-appropriate support to understand digital environments, navigate risk, build healthy relationships, recognise manipulation and seek help. This capability must develop throughout childhood rather than being introduced only when a problem arises.

Digital literacy must also extend beyond technical knowledge. Children need opportunities to understand how technology affects their emotions, relationships, identity, attention, privacy and wellbeing. They need to be supported to critically assess what they see, understand how platforms and algorithms influence them, and distinguish between connection, coercion, manipulation and exploitation.

However, responsibility cannot be placed on children alone.

Families require practical, accessible and ongoing support to understand the digital environments their children inhabit. Too often, parents and carers are told that information is available online, but are left to navigate a large and often overwhelming volume of advice without knowing what is relevant, reliable or appropriate for their child.

Through the Australian Childhood Foundation's work with ACT Playgroups, families told us they want education provided in the places and at the times they are already with their children. Families are busier, time is limited and participation in separate education programs can be difficult. Parents and carers want practical support delivered in situ, through trusted services and communities, and at a stage when their children are young so they can build their knowledge early and stay ahead as technology changes.

This means moving beyond one-off awareness campaigns. Digital safety education should be embedded into universal services that families already use, including playgroups, early childhood settings, schools, health services and community organisations. Support should be practical, relational and connected to the real experiences of children and families.

The Foundation's It's Never Too Late research also found that many parents and carers know there is a significant amount of information available, but what they often want is the opportunity to speak with someone. They want a trusted person who can listen, understand the situation and provide practical advice about what to do next.

Families need access to advice before a concern becomes a crisis. Investment should therefore include accessible phone, online and community-based support that enables parents and carers to seek guidance about digital safety, relationships, behaviour and emerging risks.

Children and young people are also increasingly turning to chatbots and artificial intelligence for advice, emotional support, love and relationships. This reflects both the accessibility of technology and the fundamentally relational nature of human beings. Children seek connection, reassurance, belonging and understanding. Where these needs are met primarily through commercial technologies rather than safe and trusted relationships, new safeguarding risks emerge.

Artificial intelligence cannot be treated simply as a technical development. It is increasingly part of children's relational and developmental environments. The design and operation of these systems must therefore consider children's vulnerability, developmental needs, privacy, dependency, emotional wellbeing and exposure to manipulation.

Companies must do more to prevent abuse and exploitation through their products and services. As set out under the Federal Child Safeguarding Positive Duty proposed in Opportunity 1, organisations should be required to identify, assess and prevent foreseeable risks to children arising from their technologies, platforms, products and business models. The application of the duty to digital environments should incorporate the eSafety Commissioner's Safety by Design principles

This includes risks created through product design, recommendation systems, algorithms, direct messaging, location functions, age assurance, artificial intelligence, commercial incentives and the failure to detect or disrupt harmful behaviour.

The rapid growth of online environments is also creating and amplifying other forms of exploitation. There are emerging risks relating to the recruitment and movement of children for criminal activity, including the use of children as drug couriers or mules, facilitated through digital platforms and online networks.

Children are also exposed to online communities and content that promote harmful and restrictive ideas about appearance, masculinity, femininity, wealth, status and success. The growth of sites and communities focused on practices such as "looksmaxxing", alongside content presenting

unrealistic or exploitative pathways to wealth and influence, can shape children's identity, relationships and sense of self at critical stages of development.

These environments risk crowding out the parts of childhood that matter most: time to play, build relationships, make mistakes, explore, laugh, learn and grow.

Children need opportunities to engage with technology, but they also need balance. A good childhood should include safe relationships, physical play, creativity, nature, rest, community participation and unstructured time alongside meaningful and age-appropriate digital experiences.

The Australian Childhood Foundation acknowledges and commends the leadership of the eSafety Commissioner in driving online safety reform, education, regulation and public awareness. The scale and speed of technological change, however, is immense. The responsibility for protecting the next generation cannot sit with one regulator alone.

The eSafety Commissioner must be adequately supported and resourced, but online safety must also become a shared responsibility across government, regulators, industry, child safeguarding organisations, researchers, schools, communities and families.

Therefore, the second action plans must protect childhood by addressing online harms. To achieve this, the plans should:

1. Invest in practical education and support for families

Fund evidence-informed education that supports parents and carers to understand children's digital lives, identify emerging risks and have developmentally appropriate conversations with their children.

Education should be delivered through universal settings families already access, including playgroups, early childhood services, schools, health services and community organisations, rather than relying solely on families to find and complete separate online programs.

2. Establish accessible advice services for parents and carers

Invest in trusted phone, online and community-based advice services that allow parents and carers to speak directly with trained professionals about online safety, relationships, emerging technologies and concerns affecting their children.

Support should be available early, before harm or family conflict escalates, and should complement existing information and reporting services.

3. Strengthen cross-sector collaboration

Invest in and expand structured collaboration between the eSafety Commissioner, government agencies, technology companies, regulators, researchers, child safeguarding experts, families and children and young people, including through existing mechanisms such as *On Us: the Australian Business Coalition for Safeguarding Children*.

This collaboration should identify emerging risks early, share intelligence and evidence, develop coordinated prevention responses and ensure that reform keeps pace with changing technologies and patterns of exploitation.

4. Invest in prevention, research and evaluation

Increase Commonwealth investment in research examining how childhood is changing, how children experience the relationship between physical and digital environments and what children and families need to support a safe and good childhood.

Research should include the impacts of artificial intelligence, online relationships, algorithmic content, digital exploitation, criminal recruitment, appearance-based communities, commercial influence and changing patterns of play, connection and development.

This research should inform a national understanding of what makes a good childhood in contemporary Australia and provides practical guidance for government, families, organisations, educators and industry.

5. Adequately resource the eSafety Commissioner

Provide sustained funding, regulatory authority and specialist capability to enable the eSafety Commissioner to respond to the growing scale and complexity of online harm.

The Commissioner's work should be supported by coordinated action across government and shared accountability across industry, rather than carrying responsibility for online child safety in isolation.



National Leadership Opportunity 5

Build a trauma-transformative system

Australia's response to child sexual abuse, family violence and other forms of childhood trauma has traditionally been organised around responding after harm has occurred. While specialist responses remain essential, this framing begins with the abuse rather than with the child.

Children do not define themselves by the trauma they have experienced. They define themselves through relationships, belonging, safety, identity and hope. If Australia is to achieve lasting change, our systems must be designed around what children need to heal and thrive, not simply around responding when something has gone wrong.

The Australian Childhood Foundation believes the next phase of reform should move beyond becoming trauma-informed towards becoming trauma-transformative. Trauma-informed practice has significantly improved understanding of how trauma affects children, young people and families. However, understanding trauma alone is not enough. A trauma-transformative approach asks a different question, not "What happened?" but "What conditions are needed for healing, recovery and growth?"

Healing is not delivered solely through specialist therapeutic services. It occurs through everyday relationships with safe adults, families, educators, communities, workplaces and organisations that understand their role in creating environments where children experience safety, connection, predictability, belonging and hope. Every interaction has the potential either to reinforce trauma or contribute to healing.

This requires Australia to move beyond seeing healing as the responsibility of specialist services alone. Governments, schools, health services, early childhood settings, sporting organisations, community organisations, businesses and workplaces all have a role in creating trauma-transformative environments that support children and families to recover and thrive.

A coordinated system begins with a shared understanding of childhood trauma and a shared commitment to safeguarding and healing. Yet Australia's service system remains fragmented across portfolios, jurisdictions and funding streams. Children and families frequently navigate multiple services with differing assessment processes, inconsistent information sharing and disconnected responses. This complexity places additional burdens on children and families at precisely the time they need coordinated support.

Creating a genuinely connected system requires more than improved referral pathways. It requires a common practice framework, shared language and a workforce that understands safeguarding, child development, trauma, healing and recovery regardless of professional discipline or organisational setting.

Workforce capability remains one of Australia's greatest opportunities for prevention. Every adult working with or around children should have the confidence to recognise early indicators of harm, understand the impacts of trauma, respond safely to disclosures, know how to seek support, and contribute to creating child safe cultures. These capabilities should not be limited to specialist practitioners but embedded across all sectors that influence children's lives.

Building a trauma-transformative system also requires a workforce with the knowledge and confidence to recognise harm, respond safely to disclosures and contribute to child safe cultures. The national Working with Children Check and mandatory safeguarding education reforms proposed in Opportunity 1 would establish an important baseline capability. This must be complemented by profession-specific education, reflective practice, supervision and ongoing development across health, education, family violence, mental health, justice, housing, child protection and community services.

Finally, Australia's universal and specialist service systems must become more inclusive and responsive to the diverse experiences of Aboriginal and Torres Strait Islander children, culturally and linguistically diverse communities, children with disability, LGBTQIA+ children and young people, and those living in rural and remote communities. Trauma-transformative systems are culturally responsive, strengths-based and designed alongside the communities they serve.

The strongest child protection system is one that supports children long before statutory intervention becomes necessary. By investing in trauma-transformative systems, strengthening workforce capability and embedding safeguarding knowledge across the broader community, Australia can create a future where more children experience healing, families receive support earlier, and abuse is prevented before it occurs.

Therefore, the second action plans must build a trauma-transformative system for children, families and the workforce. To achieve this, the plans should:

1. Shift Australia's policy and service response from trauma-informed to trauma-transformative, embedding healing, recovery, connection and belonging as core objectives across all child and family systems.
2. Develop a national workforce capability framework that embeds safeguarding, trauma, child development and responding to abuse across all professions working with or around children.
3. Invest in workforce wellbeing through supervision, reflective practice, trauma support and professional development to strengthen workforce sustainability.
4. Ensure universal and specialist services are culturally safe, accessible and co-designed with Aboriginal and Torres Strait Islander communities and other priority populations.



Children and young people experience safety and belonging, are supported to heal from trauma, and grow with hope in networks of safe and supportive relationships that empower them to shape strong futures for themselves.