
Djirra's submission to the consultations to inform the Second Action Plan (National Plan to End Violence against Women and Children 2022–2032)

Djirra welcomes the opportunity to provide this submission to inform the development of the Second Action Plan under Australia's *National Plan to End Violence against Women and Children 2022–2032* (the National Plan) building on our previous submissions with regards to the *National Plan* and *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036* (Our Ways).

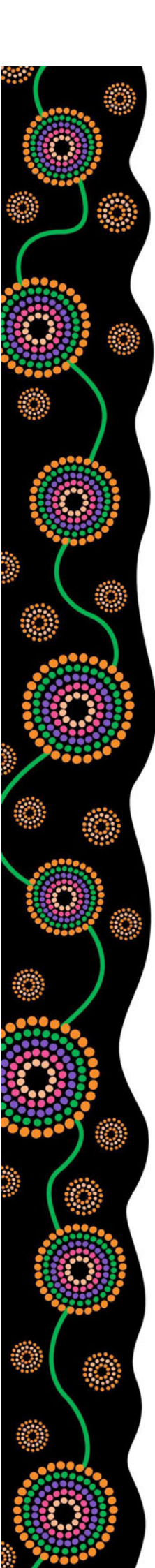
Djirra is an Aboriginal Community Controlled Organisation (ACCO) and active member of the First Nations Advocates Against Family Violence (FNAAFV), the peak body for Family Violence Prevention and Legal Services (FVPLS). We refer to and recommend FNAAFV's submission to inform the Second Action Plan, to which Djirra contributed.

For over 24 years, Djirra has provided culturally safe, specialist family violence support, legal services and case management, alongside early intervention and prevention, cultural and wellbeing programs, to Aboriginal women experiencing or at risk of experiencing family violence.¹ Djirra's holistic integrated service model recognises that family violence does not occur in isolation and that Aboriginal women often require support across multiple systems simultaneously.

The evidence is clear. Aboriginal women continue to experience family violence at disproportionately high rates, exacerbated by structural racism stemming from colonisation. Family violence remains the central issue driving the removal of Aboriginal children and the homelessness, criminalisation, and poor health outcomes (including suicide) of Aboriginal women.

Djirra's experience demonstrates that the solutions are also clear. Governments must move beyond consultation and commit to sustained investment in Aboriginal self-determination and Aboriginal-led solutions. This includes long-term investment in FVPLSs, implementation of Child Protection Notification and Referral Systems, establishment of Djirra's Aboriginal Women's Centre, reform of child protection and justice systems, increased access to housing, expansion of culturally safe services, and stronger data collection, reporting and accountability mechanisms.

¹ Notes on language: Djirra uses the term 'Aboriginal' to refer to Aboriginal and Torres Strait Islander peoples living in Australia. The term 'family violence' is used to encompass sexual violence, intimate partner violence and domestic violence, consistent with section 5 of the *Family Violence Protection Act 2008* (Vic).



Recommendations

To achieve the vision of the National Plan to end violence against women in one generation, Djirra recommends that the Second Action Plan commit governments to:

Investing in Aboriginal-led Solutions

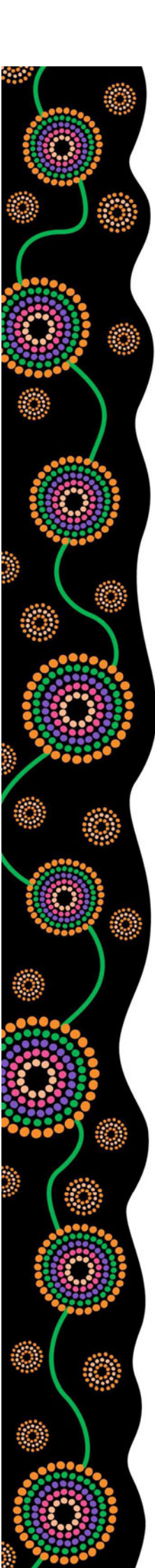
1. Increase long-term investment in specialist FVPLSs to deliver and meet growing demand for legal and family violence services, healing and community education initiatives, early intervention and prevention programs including Djirra's Young Luv®, Sisters Day Out®, Dilly Bag and Koori Women's Place, to ensure Aboriginal women who have, are or are at risk of family violence can access the culturally safe support they need.
2. Establish a dedicated and ongoing funding stream within the Department of Social Services for FVPLS's prevention and early intervention programs, counselling, family violence case management services, cultural workshops and community education initiatives to complement the specialist legal services provided by these organisations ensuring that Aboriginal women receive the necessary wraparound services for their safety and that of their children.
3. Ensure FVPLSs are funded through both Our Ways and the National Plan, including through implementation of Closing the Gap Priority Reform commitments to redirect investment and decision-making authority to Aboriginal community-controlled organisations.
4. Achieve and maintain pay parity for FVPLS and ACCO staff with the broader legal assistance and community services sectors, and ensure funding arrangements are indexed to reflect inflation, award increases and rising service delivery costs.
5. Adopt a self-determined, needs-based funding approach that enables FVPLSs and ACCOs to direct resources according to need and safety, rather than geographic population thresholds or remoteness-based formulas.
6. Commit funding towards the establishment of Djirra's longstanding 24-year vision for an Aboriginal Women's Centre as a nationally significant Aboriginal-led family violence prevention, healing and recovery initiative and model for future Aboriginal Women's Centres across Victoria and Australia, in line with Yoorrook for Transformation recommendation 80b.²
7. Invest in Djirra's regional expansion of its full suite of services to ensure that no Aboriginal woman or child experiencing family or sexual violence has to travel more than 100 kilometres or one hour to access holistic, culturally safe specialist legal and non-legal support.
8. Mandate ongoing Aboriginal-led cultural capability training and accountability mechanisms across police, courts, child protection, family violence and corrections systems to address racial and gendered bias, misidentification, and systemic failures in line with Yoorrook for Justice recommendation 5.³

Data and Accountability

9. Consistent with the principles of Indigenous Data Sovereignty and Indigenous Data Governance, invest in FVPLSs to collect, govern, analyse and use data relating to Aboriginal

² Yoorrook Justice Commission. (2023). [Yoorrook for Transformation: Summary Report](#). (Recommendation 80b, p. 76).

³ Yoorrook Justice Commission. (2023). [Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems](#). (Recommendation 5, p. 28).



women and children, and to exercise authority over its creation, monitoring, evaluation, ownership and use.

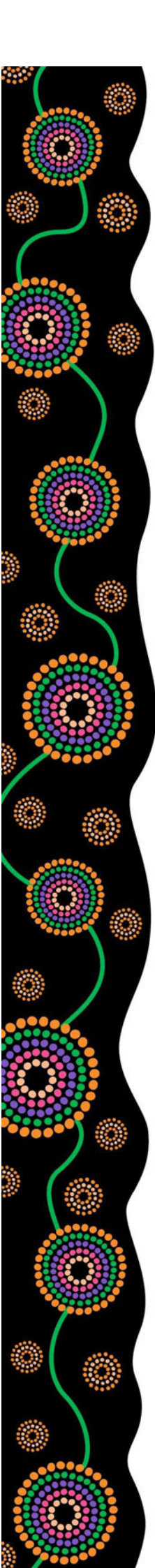
10. Establish tangible and measurable targets, commitments and reporting mechanisms that reflect the interrelatedness of Closing the Gap Targets 9, 10, 11, 12 and 13 and strengthen government accountability for outcomes.
11. Ensure that all data relating to Aboriginal women and children who are, or are at risk of, experiencing family violence is:
 - disaggregated by relevant demographics, including but not limited to age, gender, Aboriginality and location;
 - accurate, current and regularly updated, including through the urgent updating of Closing the Gap Target 13 data; and
 - publicly available and tabled through regular, detailed and transparent reporting mechanisms.

Family and Sexual Violence Against Aboriginal Women

12. Explicitly recognise family violence against Aboriginal women as a gendered issue and apply an intersectional gender lens across all policies, programs and initiatives to end violence against women.
13. Address all forms of family and sexual violence against Aboriginal women, including systems abuse and cultural abuse, and explicitly acknowledge their interconnectedness with racism, colonisation and structural inequality.
14. Address barriers to disclosing and reporting violence by strengthening and investing in culturally safe pathways for disclosure, reporting and support that respond to the needs and preferences of Aboriginal women, including through FVPLSs and other specialist family violence service referral pathways.
15. Recognise that supporting Aboriginal women's mental health, recovery and healing is a critical response to family and sexual violence and an essential component of suicide prevention, and invest in culturally safe Aboriginal-led healing, counselling and therapeutic supports.
16. Provide Djirra with adequate, secure, multi-year funding through the Department of Social Services to re-establish and sustain an Aboriginal-led counselling service as a core component of Djirra's integrated family violence response. Funding should support sufficient counselling and administrative capacity, follow-up and referral coordination, and flexible service delivery through both face-to-face and telehealth models. Funding must also meet the current and growing demand.
17. Fund and implement standardised, culturally appropriate Acquired Brain Injury screening for Aboriginal people experiencing family and sexual violence across health and related service systems, with timely referral pathways to specialist Aboriginal-led services such as Djirra and other FVPLSs.

Child Protection

18. Acknowledge gender-based violence against Aboriginal women as the main driver of the removal of Aboriginal children.
19. Establish national standards and programs to prevent the removal of Aboriginal children and support reunification, including by establishing Child Protection Notification and Referral



Systems as per Yoorrook for Justice recommendation 12, to ensure Aboriginal women receive specialist, culturally safe legal assistance from FVPLSs as soon as child protection becomes involved.⁴

20. Prioritise funding to keep Aboriginal mothers and children safe and together wherever possible, by:
- Recognising that improving safety for Aboriginal women is critical to reducing child protection involvement and improving outcomes for Aboriginal children; and
 - Expanding programs that support Aboriginal mothers and children to remain safely together, including in custodial settings.

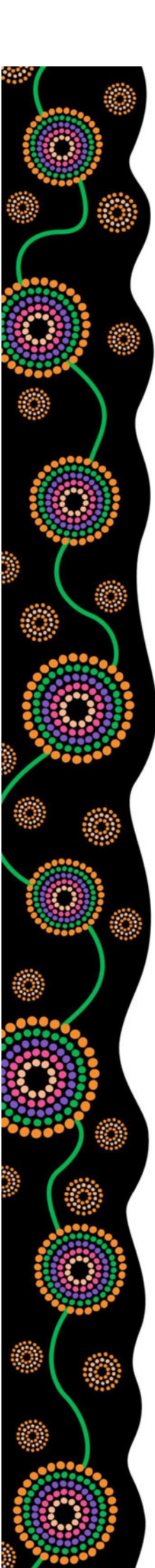
Justice

21. Urge States and Territories to repeal punitive laws and justice system responses, and to not create future punitive laws and responses, that disproportionately criminalise and punish Aboriginal women who experience family violence, poverty, homelessness, racism, misidentification and racial targeting, and other forms of disadvantage.
22. Address misidentification and other forms of racial targeting by police by requiring that all Aboriginal women involved in a family violence incident are referred to an FVPLS to receive specialist legal assistance.
23. Call for increased investment in Djirra's Prison Support Program and other specialist, culturally safe prison, recovery and reintegration programs for Aboriginal women who have experienced family violence.
24. Increase access to legal aid funding for Aboriginal women experiencing family violence by introducing more flexible means and assets testing requirements and higher limits.
25. Amend the *Family Law Act 1975* (Cth) to include systems abuse as a form of family violence and require that judicial officers presiding in the Federal Circuit and Family Court of Australia consider systems abuse, misidentification and systemic racism when making decisions affecting Aboriginal women and children.

Housing

26. Increase investment in Aboriginal-led and Aboriginal-specific crisis, transitional and long-term housing responses that support Aboriginal women and children to escape and recover from violence, remain safe and together, and stay connected to family, community, culture and Country.
27. Invest in FVPLSs and other specialist family violence services to improve coordination between family violence, housing and child protection systems to ensure women are not forced to choose between violence, homelessness and child removal.
28. Address systemic barriers, including racism and discrimination within housing and homelessness systems, that prevent Aboriginal women from accessing safe accommodation.
29. The Commonwealth take immediate steps to provide income support and financial safety net to Aboriginal and Torres Strait Islander women escaping family violence, including but not limited to:

⁴ Yoorrook Justice Commission. (2023). [*Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems*](#). (Recommendation 12, p. 31).

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- Providing an automatic exemption from mutual obligation requirements, to seek employment or complete study, when an Aboriginal woman is experiencing family violence.
 - Aboriginal women who have experienced family violence must have access to a culturally safe family violence liaison to provide support in the job seeking process and ensure suggested roles are safe and appropriate.
 - Immediately end contractual obligations to Telstra Health in relation to the Leaving Violence Program and redirect this funding to FVPLSs delivering specialist services on the ground to Aboriginal women escaping violence.

Investing in Aboriginal-led Solutions

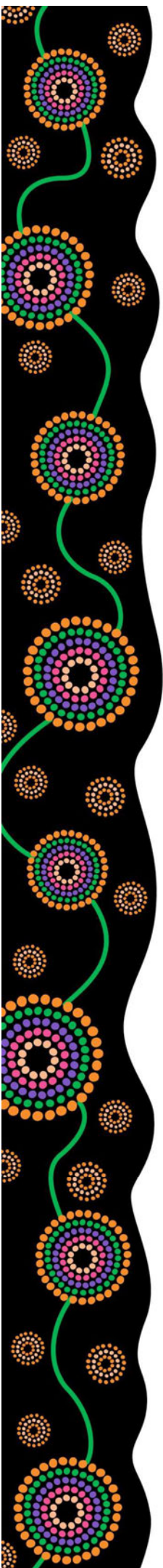
Aboriginal women have repeatedly told governments what is needed to keep our women and children safe. For decades, Aboriginal women, FVPLSs and ACCOs have advocated for self-determined solutions grounded in culture, healing, prevention and community control, yet governments continue to underinvest in these proven Aboriginal-led approaches.

Genuine self-determination requires governments to transfer resources, decision-making authority and accountability to Aboriginal women and Aboriginal-led specialist organisations.

FVPLSs were established to provide Aboriginal people experiencing family violence with access to culturally safe legal and non-legal support. We are the experts. We recognise the complex and interconnected impacts of family violence for Aboriginal women. We know that family violence does not occur in isolation and we provide the specialist and holistic support, across the multiple systems, that Aboriginal women are often required to navigate.

As Djirra approaches its 25th year, demand for our services continues to grow and increasingly outpace capacity. Between the 2020-21 and 2024-25 financial years, the total number of clients supported by Djirra's Legal Services increased by 45 per cent, with the total number of services delivered increasing by 77 per cent. In 2023-24, Djirra's case management service assisted almost 70 per cent more clients than the previous year and delivered double the number of service hours. Despite rapidly growing demand, funding levels have not kept pace with demand or inflation and specialist Aboriginal FVPLSs remain chronically under-resourced.

Governments must provide increased and long-term investment to FVPLSs and other specialist ACCOs to ensure the safety of Aboriginal women and children. In doing this, governments must move away from rigid funding approaches that are based primarily on population thresholds or remoteness classifications. These approaches do not reflect the diverse and unique realities of Aboriginal women seeking safety, the mobility patterns of women escaping violence, the need for statewide continuity of care, or the significant service gaps that exist across urban, regional and rural communities. The Second Action Plan must promote a self-determined approach to investment that empowers FVPLSs and ACCOs to direct resources according to need, safety and community priorities.



Funding must align with the Federal Government's recognition of gender-based violence against Aboriginal women as a national crisis and the proven solutions that FVPLSs offer. Governments must commit to working in partnership with, and adequately resourcing, FVPLSs under both Our Ways and the broader National Plan. The existence of the dedicated Our Ways plan must not result in Aboriginal-led organisations being excluded from mainstream family violence funding opportunities. Investment in Aboriginal-led solutions must occur across all government strategies, funding streams and reform agendas.

The Second Action Plan must include dedicated and sustained investment in specialist Aboriginal FVPLSs and reallocate funding for Aboriginal programs out of mainstream services and into specialist FVPLSs to ensure Aboriginal women have access to culturally safe support. Governments cannot end violence against Aboriginal women without investing in the Aboriginal-led organisations that Aboriginal women trust and choose to access.

Investing in FVPLSs and the Aboriginal family violence workforce

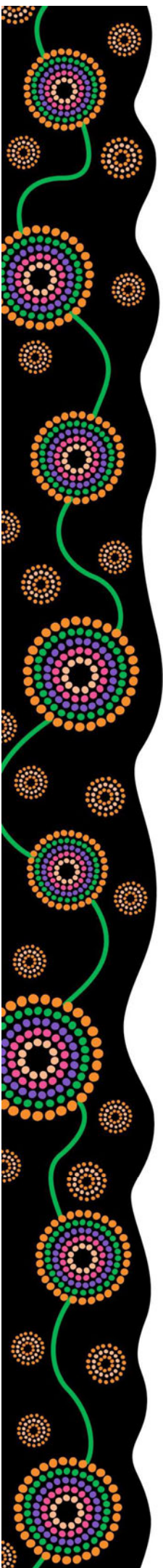
Investment in Aboriginal-led solutions to ending violence against women must be accompanied by investment in the organisations and workforce that deliver them.

Consistent with Closing the Gap Priority Reforms and commitments under the National Plan and Our Ways, governments must increase investment in specialist FVPLSs and other ACCOs and progressively shift resources to Aboriginal-led services so that Aboriginal women can access culturally safe support as a first choice, rather than where mainstream systems fail.

Funding insecurity continues to place Aboriginal women and children at risk by undermining the sustainability of specialist FVPLSs and other ACCOs. Aboriginal women often require support across multiple interconnected systems, including family violence, child protection, policing, housing and justice systems. Supporting women through these systems is resource-intensive and requires specialist cultural knowledge, advocacy and long-term engagement. Funding models frequently underestimate the time and expertise required to support Aboriginal women experiencing family violence and do not adequately resource the advocacy work undertaken by FVPLSs and other ACCOs. Long-term, flexible and sustainable funding is essential to ensuring Aboriginal women can access culturally safe family violence services when they need them.

The Second Action Plan must also recognise the unique pressures facing the Aboriginal family violence workforce. At Djirra, 76 per cent of the non-legal workforce is Aboriginal. Aboriginal practitioners often carry significant cultural, community and emotional responsibilities that extend beyond the demands ordinarily associated with frontline legal and family violence practice, often referred to as 'cultural load' or 'colonial load'. Further, Aboriginal practitioners are often personally impacted by the same forms of systemic violence and injustice as the women and communities being supported.

The Second Action Plan must prioritise sustainable workforce investment that recognises the unique pressures facing the Aboriginal family violence workforce by funding culturally safe supervision, wellbeing and vicarious trauma supports, professional development, workforce



growth, adequate leave and staffing levels that allow practitioners to step back when needed without compromising services to Aboriginal women. This is essential to support the recruitment, retention and wellbeing of the Aboriginal family violence workforce.

A sustainable workforce also requires pay parity and appropriately indexed funding. Current funding arrangements create ongoing recruitment and retention challenges for FVPLSs, because we cannot compete with the salaries and graduate pathways offered by larger mainstream legal and community sector organisations. Funding disparities undermine the capacity of FVPLSs to attract, train and retain specialist staff and increase pressure on services to recruit, train and supervise a more junior workforce. These challenges are particularly pronounced in regional areas, where due to issues such as isolation, housing shortages and smaller practitioner population sizes, workforce shortages are already acute.

Pay parity is particularly important for specialist Aboriginal family violence services. At Djirra, more than 90 per cent of staff are women and 76 per cent of the non-legal family violence and community engagement workforce is Aboriginal. Achieving pay parity is therefore critical to sustaining an experienced Aboriginal family violence workforce, strengthening the economic security of Aboriginal women workers, and ensuring Aboriginal women can continue to access culturally safe support.

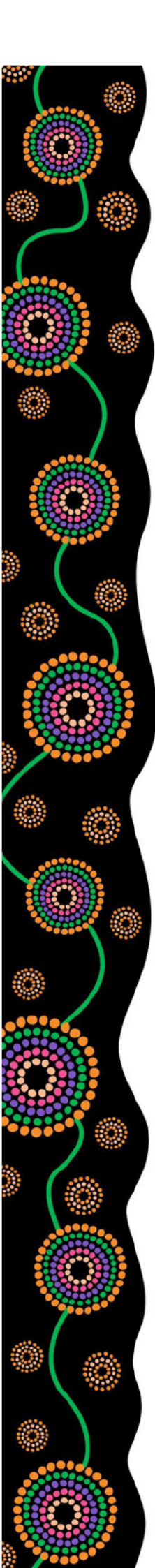
Funding arrangements must also be appropriately indexed. Recent increases to award rates have resulted in substantial additional costs that have not been matched through government funding. Without funding growth that reflects award increases, inflation and rising operational costs, specialist FVPLSs such as Djirra are forced to absorb increasing costs while continuing to meet growing demand.

Without long-term, flexible, adequately indexed funding and pay parity across the sector, specialist FVPLSs cannot retain experienced staff, expand services or meet increasing demand. Governments cannot end violence against Aboriginal women without investing in FVPLSs as the sector that specialises in this work, and that Aboriginal women trust and choose to access.

Aboriginal-led prevention and early intervention: Proven solutions

While the National Plan highlights the need for a holistic approach across the continuum of prevention, early intervention, response and recovery, governments continue to disproportionately invest in crisis responses and punitive justice interventions, while underinvesting in Aboriginal-led early intervention and prevention.

Djirra has developed a number of successful early intervention and prevention programs recognised internationally and by the Victorian Royal Commission into Family Violence as best practice. Our programs are trusted, culturally strong and trauma-informed, providing culturally safe pathways for Aboriginal women and girls to learn about family violence, recognise warning signs, strengthen cultural connection and access legal and non-legal support.



Djirra's signature early intervention and prevention programs, Sisters Day Out®, Dilly Bag, Young Luv® and Koori Women's Place, support Aboriginal women and girls by:

- drawing on cultural strength to build resilience;
- reducing social isolation;
- promoting healthy and respectful relationships;
- increasing awareness of family violence, including patterns of power, control and coercion;
- strengthening confidence, self-worth and connection to culture; and
- creating pathways to legal, family violence and wellbeing supports.

These programs deliver far more than prevention outcomes. They provide trusted, culturally safe pathways for Aboriginal women to access a broad range of support. Through Djirra's cultural early intervention and prevention work, women build strong relationships with staff, strengthening their confidence to seek help when they need it. These relationships can open the door to legal assistance, family violence support, case management, counselling and services delivered by external providers. Djirra's community engagement programs are therefore not simply complementary activities - they are critical gateways to safety, justice and ongoing support.

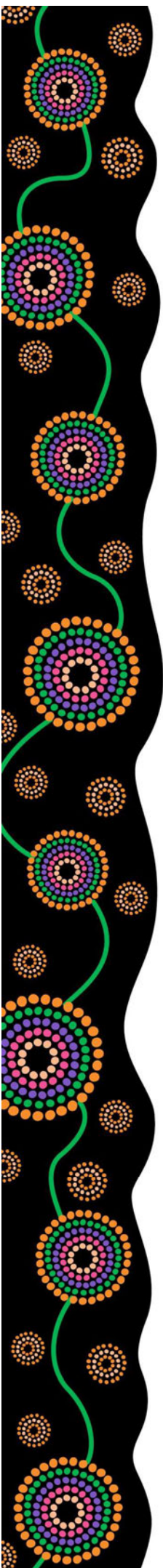
Case study

Sarah was referred to Djirra after significant family violence, which led to her son, Max, being removed from her care. Djirra provided a safe place for Sarah to share her experience, supported her to access emergency accommodation, obtain a mental health care plan, and receive referrals to a range of support services. Sarah's lawyer told her about Djirra's Koori Women's Place programs and Sarah started attending workshops where she reconnected with culture. Sarah was now feeling empowered to apply for an Intervention Order (FVIO) which was granted. This provided Sarah with the safety she needed to support recovery and address child protection's concerns. Sarah obtained an affordable private rental, attended regular counselling and alcohol and other drug sessions, and completed negative drug screens. Max was eventually returned to Sarah's care. By accessing various supports through Djirra's services, Sarah was able to establish a stable and safe living environment for her and her son⁵.

Djirra's prevention programs have demonstrated positive outcomes for Aboriginal women and girls. An independent evaluation of Young Luv® conducted by VicHealth found that 94 per cent of participants rated the program as useful and relevant, with participants reporting increased understanding of healthy relationships, greater awareness of family violence warning signs, improved confidence and stronger connection to culture. The evaluation concluded that the program's effectiveness stemmed from its Aboriginal-led design, cultural safety and strong connections to community.⁶

⁵ To protect the anonymity of those involved, this is a fictionalised account drawn from an amalgamation of real-life stories of Aboriginal women, experiences, and testimonials gathered from our frontline workers. Any resemblance to actual individuals is purely coincidental.

⁶ Djirra: Aboriginal Family Violence Prevention and Legal Service. (2017). [*Evaluation of Young Luv Program to Prevent Violence Against Women*](#).



Djirra's experience demonstrates that Aboriginal-led prevention, early intervention and healing initiatives are proven investments in keeping Aboriginal women and children safe from violence.

Despite this evidence, there remains no dedicated Commonwealth funding stream through the Department of Social Services to support the non-legal services and programs delivered by FVPLSs. Dedicated and ongoing investment is required to sustain prevention, early intervention, case management, counselling, cultural healing and community education programs that are critical to keeping Aboriginal women safe and preventing the escalation of violence.

Djirra's Aboriginal Women's Centre: An Aboriginal-led solution

Djirra's Aboriginal Women's Centre is a practical, Aboriginal-led solution to improving safety for Aboriginal women and children. It has been a vision of Djirra and Aboriginal women for almost 25 years and is supported by Recommendation 80(b) of the *Yoorrook for Transformation* (2025) report which recommend ACCOs be funded to establish First Peoples Women's Centres for Aboriginal women.⁷

Djirra's Aboriginal Women's Centre will provide an integrated Aboriginal-led model incorporating family violence support, legal services, counselling, healing, cultural programs, prevention initiatives and community connection in a single location. Djirra's Centre is designed to support Aboriginal women across the continuum of prevention, early intervention, crisis response, recovery and healing; providing culturally safe pathways to support before violence escalates, assist Aboriginal women and children to recover from violence, and strengthen connection to culture, community and identity. By bringing together services that are often fragmented across multiple systems, Djirra's Centre will strengthen continuity of care and ensure Aboriginal women can access support in ways that are culturally safe, holistic and self-determined.

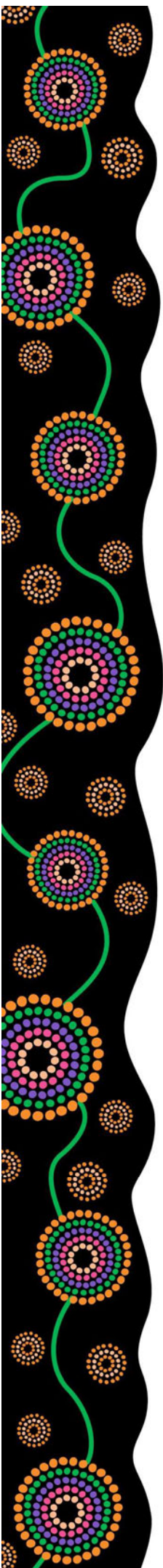
Funding Djirra's Aboriginal Women's Centre is a practical investment in prevention, early intervention, healing and safety. Djirra's Centre will be underpinned by self-determination, a place of cultural affirmation where Aboriginal women's strength, knowledge, creativity, and entrepreneurial acumen will be showcased and celebrated. As the first Aboriginal Women's Centre of its kind in Victoria, Djirra's Centre will provide a practical model for the establishment of similar Aboriginal-led centres across Victoria and Australia.

Djirra's Aboriginal Women's Centre represents a nationally significant opportunity to demonstrate how governments can support scalable, Aboriginal-led solutions that strengthen safety, healing, self-determination and community connection for Aboriginal women and children.

Ensuring regional access to services and supports

The National Plan acknowledges the importance of supporting women from regional and remote areas. Djirra is clear that location should never determine whether an Aboriginal woman can

⁷ Yoorrook Justice Commission. (2023). [Yoorrook for Transformation: Summary Report](#). (Recommendation 80b, p. 76).



access safety. Yet across Victoria and Australia, access to culturally safe family violence services remains uneven, particularly in regional communities where Aboriginal women often have limited options for specialist Aboriginal-led legal, family violence and wellbeing support.

Djirra's vision is that no Aboriginal woman should have to travel more than 100 kilometres or one hour to access culturally safe support for her safety and the safety of her children. Achieving this vision requires sustained investment in regional service delivery and expansion of Aboriginal-led responses across Victoria and Australia.

Aboriginal women in regional areas frequently face additional barriers when seeking support, including limited service availability, workforce shortages, transport barriers, housing insecurity and concerns about confidentiality in smaller communities. Demand for services continues to grow across regional Victoria. For example, in 2023, Djirra opened an expanded services centre in Melton, just outside of metropolitan Melbourne. Within its first year, client numbers increased fourteen-fold, demonstrating the significant unmet need for culturally safe services in local communities. By delivering programs directly in community, Djirra meets women where they are - strengthening our reach, building trusted relationships and connecting more Aboriginal women with culturally safe support.

Djirra has completed a business case for further regional expansion and requires ongoing government investment to establish new services where they are most needed. Expanding Aboriginal-led services across regional Victoria and Australia is critical to ensuring Aboriginal women can access culturally safe support regardless of where they live.

Strengthening cultural safety across frontline systems

Aboriginal women seeking support regularly interact with police, courts, legal services, child protection and family violence systems. Improving outcomes for Aboriginal women requires frontline workers and institutions to understand and respond appropriately to Aboriginal women's experiences of violence, racism and systemic injustice.

As discussed throughout this submission, Aboriginal women continue to experience racism, bias, misidentification and other systemic failures when seeking support. Building the cultural capability of frontline workers is therefore critical to improving safety, reducing barriers to support and ensuring Aboriginal women receive responses that are culturally safe, trauma-informed and victim-centred.

Djirra delivers Aboriginal-led cultural safety initiatives that centre the experiences and voices of Aboriginal women and strengthen the capacity of frontline workers, policy makers and institutions to respond safely and appropriately to Aboriginal women experiencing violence. These initiatives support participants to develop a deeper understanding of culture, colonisation, racism, allyship and systems abuse, while building accountability for culturally safe practice.

Djirra's cultural safety programs include:

- **Yarnin' About Cultural Safety (YACS)**, designed for frontline family violence and community service workers. This program strengthens cultural safety, confidence and practice through open dialogue with Aboriginal women and Djirra staff.
- **Heard It Here First (HIHF)**, designed for policy, leadership and systems-focused roles. This program explores culture, colonisation, racism, allyship and the systemic barriers Aboriginal women continue to encounter when seeking support.
- **Invisible No More**, designed for the legal sector. The program examines the impact of laws, legal systems and legal practice on Aboriginal women and explores the reasons many Aboriginal women remain fearful and reluctant to engage with the legal system.

Over a six-month period in 2025, Djirra delivered 22 YACS and HIHF sessions to almost 500 participants across 27 organisations. Following successful pilot sessions, *Invisible No More* is generating strong interest from legal professionals across Victoria. This demonstrates both the demand for and value of Aboriginal-led cultural capability initiatives in improving system responses to Aboriginal women experiencing violence.

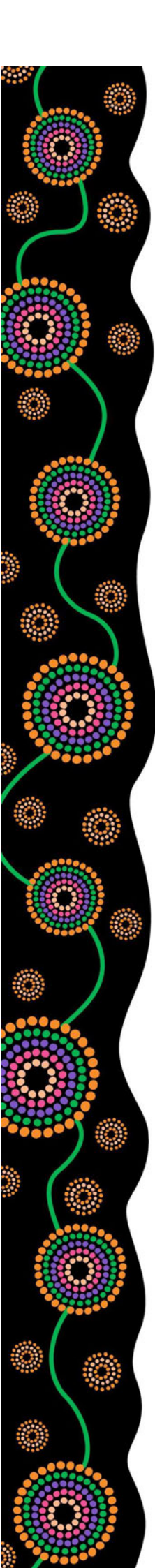
Aboriginal-led cultural safety initiatives are a practical and evidence-informed solution to improving family violence system responses. The Second Action Plan should support and expand these initiatives through dedicated investment and by mandating ongoing Aboriginal-led cultural safety training and accountability mechanisms across police, courts, child protection, family violence and corrections systems. This approach is consistent with Recommendation 5 of the *Yoorrook for Justice* (2023) report, which calls for a significant upscale in the capability, competence and support of frontline systems in relation to Aboriginal rights and cultural safety.⁸

Recommendations

The Second Action Plan should:

1. Increase long-term investment in specialist FVPLSs to deliver and meet growing demand for legal and family violence services, healing and community education initiatives, early intervention and prevention programs including Djirra's Young Luv®, Sisters Day Out®, Dilly Bag and Koori Women's Place, to ensure Aboriginal women who have, are or are at risk of family violence can access the culturally safe support they need.
2. Establish a dedicated and ongoing funding stream within the Department of Social Services for FVPLS's prevention and early intervention programs, counselling, family violence case management services, cultural workshops and community education initiatives to complement the specialist legal services provided by these organisations ensuring that Aboriginal women receive the necessary wraparound services for their safety and that of their children.
3. Ensure FVPLSs are funded through both Our Ways and the National Plan, including through implementation of Closing the Gap Priority Reform commitments to redirect investment and decision-making authority to Aboriginal community-controlled organisations.

⁸ Yoorrook Justice Commission. (2023). [Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems](#). (Recommendation 5, p. 28).

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4. Achieve and maintain pay parity for FVPLS and ACCO staff with the broader legal assistance and community services sectors, and ensure funding arrangements are indexed to reflect inflation, award increases and rising service delivery costs.
 5. Adopt a self-determined, needs-based funding approach that enables FVPLSs and ACCOs to direct resources according to need and safety, rather than geographic population thresholds or remoteness-based formulas.
 6. Commit funding towards the establishment of Djirra's longstanding 24-year vision for an Aboriginal Women's Centre as a nationally significant Aboriginal-led family violence prevention, healing and recovery initiative and model for future Aboriginal Women's Centres across Victoria and Australia, in line with Yoorrook for Transformation recommendation 80b.⁹
 7. Invest in Djirra's regional expansion of its full suite of services to ensure that no Aboriginal woman or child experiencing family or sexual violence has to travel more than 100 kilometres or one hour to access holistic, culturally safe specialist legal and non-legal support.
 8. Mandate ongoing Aboriginal-led cultural safety training and accountability mechanisms across police, courts, child protection, family violence and corrections systems to address racial and gendered bias, misidentification, and systemic failures in line with *Yoorrook for Justice* Recommendation 5.¹⁰

Data and Accountability

Ending violence against Aboriginal women requires Aboriginal women to be visible in policy, data and reporting. An overhaul of the family violence data ecosystem is needed to better understand Aboriginal women's lived realities and the effectiveness of system responses to end violence against Aboriginal women and children.

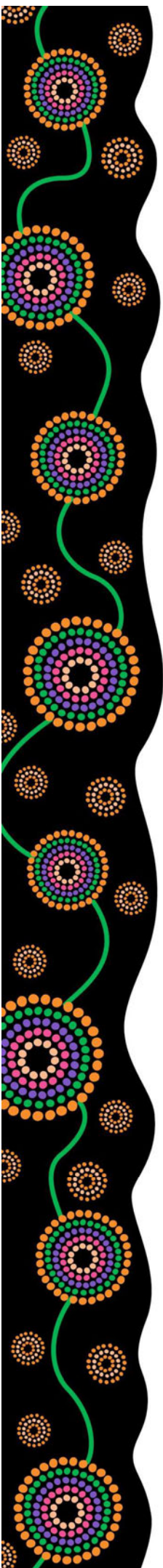
Djirra is concerned that existing government data collection and accountability frameworks do not adequately capture the experiences of Aboriginal women, who continue to remain largely invisible within policy and reporting systems. This limits governments' ability to understand the scale and nature of family violence experienced by Aboriginal women, assess whether reforms are working, and identify where further investment is required. Aboriginal women must also be visible within data relating to child protection, homelessness, justice system involvement, misidentification and other outcomes that are closely connected to family violence.

The 2025 *Closing the Gap Annual Data Compilation Report* confirms that the most recent data available for Target 13, reducing all forms of family violence against Aboriginal women and children, remains the 2018-19 baseline data and that no survey is currently underway or planned to collect updated data.¹¹ Without current and reliable data, it is not possible to accurately measure progress in reducing family violence against Aboriginal women and children. This

⁹ Yoorrook Justice Commission. (2023). [Yoorrook for Transformation: Summary Report](#). (Recommendation 80b, p. 76).

¹⁰ Yoorrook Justice Commission. (2023). [Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems](#). (Recommendation 5, p. 28).

¹¹ Productivity Commission. (2025). [Closing the Gap: Annual Data Compilation Report](#).



undermines the ability of governments, Aboriginal communities and frontline services to identify emerging issues, direct investment and hold systems accountable for outcomes.

However, collecting more data alone is not enough. The way data is collected, governed, analysed and reported is equally important. Current data collection and reporting frameworks, including those used under Closing the Gap, are largely confined to quantitative and deficit-based measures. These approaches do not adequately capture Aboriginal women's experiences of family violence, the strengths and resilience of Aboriginal women and communities, nor the interconnected and systemic harms that shape safety outcomes. Principles of Indigenous Data Sovereignty and Indigenous Data Governance must underpin all efforts to measure progress towards ending violence against Aboriginal women and children.

Aboriginal-led organisations, such as Djirra and other FVPLSs, are best placed to collect, hold, interpret and use data in ways that are culturally safe, community-led and responsive to local priorities. Yet governments continue to underinvest in the data and digital capability of Aboriginal-led organisations and fail to adequately resource Aboriginal organisations to collect, govern, analyse and use data in ways that support self-determination, accountability and system reform. Sustainable investment is required to enable FVPLSs to exercise authority over the creation, collection, governance, analysis, ownership and use of data relating to Aboriginal women and children, consistent with the principles of Indigenous Data Sovereignty and Indigenous Data Governance.

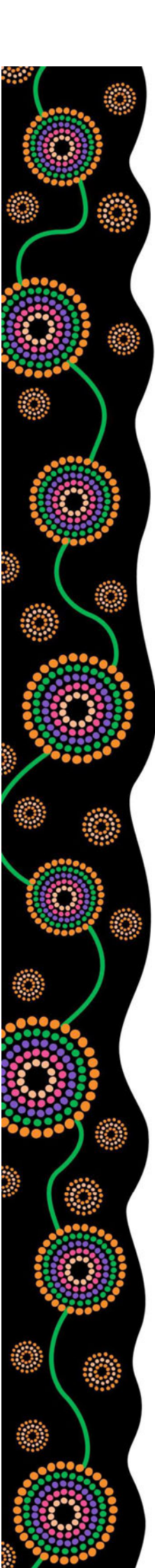
It is also essential that governments commit to sustained investment in Closing the Gap Priority Reform 4, including shared access to data and information at a regional level. Increased investment would enable Djirra and other FVPLSs to undertake data analysis, measure the effectiveness of reforms and identify critical service and system gaps affecting Aboriginal women and children.

Finally, governments must strengthen accountability for outcomes. The Second Action Plan must include clear actions, measurable commitments and transparent reporting arrangements that reflect the interconnected nature of the Closing the Gap targets, particularly Targets 9, 10, 11, 12 and 13. Governments must also commit to regular public reporting, independent evaluation and Aboriginal-led oversight to ensure commitments translate into meaningful improvements in safety and wellbeing for Aboriginal women and children. Aboriginal communities and organisations must be empowered to participate in decision-making and accountability processes as partners, rather than being limited to advisory roles.

Recommendations

The Second Action Plan should:

1. Consistent with the principles of Indigenous Data Sovereignty and Indigenous Data Governance, invest in FVPLSs to collect, govern, analyse and use data relating to Aboriginal women and children, and to exercise authority over its creation, monitoring, evaluation, ownership and use.

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2. Establish tangible and measurable targets, commitments and reporting mechanisms that reflect the interrelatedness of Closing the Gap Targets 9, 10, 11, 12 and 13 and strengthen government accountability for outcomes.
 3. Ensure that all data relating to Aboriginal women and children who are, or are at risk of, experiencing family violence is:
 - disaggregated by relevant demographics, including but not limited to age, gender, Aboriginality and location;
 - accurate, current and regularly updated, including through the urgent updating of Closing the Gap Target 13 data; and
 - publicly available and tabled through regular, detailed and transparent reporting mechanisms.

Family and Sexual Violence Against Aboriginal Women

Recognising the structural drivers of violence against Aboriginal women

Family and sexual violence against Aboriginal women is a structural problem. As such, to realise the vision of the National Plan, the Second Action Plan must explicitly address the structural drivers of violence that contribute to the disproportionate rates of violence experienced by Aboriginal women, and invest in the self-determined solutions that address them.

The structural drivers of family and sexual violence against Aboriginal women include gender discrimination, systemic racism, colonialism, dispossession, intergenerational trauma, poverty and housing insecurity. Structural racism is embedded across systems with which Aboriginal women must interact, including family violence responses, child protection, policing, justice, housing and health systems.

Recognising the scale and nature of violence against Aboriginal women

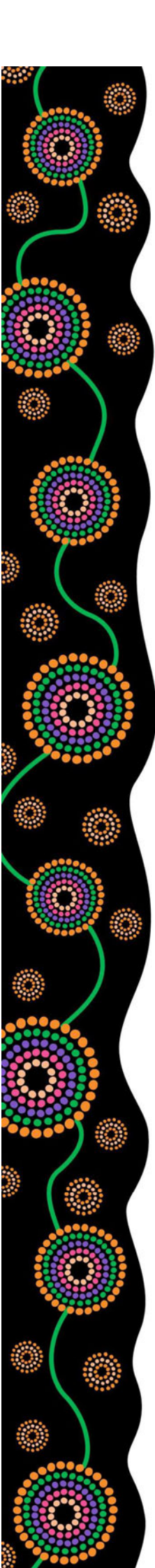
Aboriginal women experience family violence at far higher rates than other women. Nationally, Aboriginal women are 27 times more likely to be hospitalised due to family violence.¹² In Victoria, Aboriginal women are 45 times more likely to experience family violence and 25 times more likely to be killed or injured.¹³

These statistics demonstrate that violence against Aboriginal women is a national crisis requiring targeted, Aboriginal-led responses. However, the true scale of violence is likely to be significantly greater than available data suggests due to widespread underreporting and barriers to disclosure. Evidence has shown that over 90% of family and sexual violence against Aboriginal women goes unreported, meaning the true scale of violence is far greater than official data suggests.¹⁴ The Second Action Plan must therefore be grounded in the lived realities of Aboriginal women and

¹² Australian Institute of Health and Welfare. (2026). [*Family, domestic and sexual violence: Aboriginal and Torres Strait Islander people.*](#)

¹³ Victorian Government. (2021). [*Aboriginal self-determination.*](#)

¹⁴ Australian Institute of Criminology. (2011). [*Non-disclosure of violence in Australian Indigenous communities;*](#) Australian Institute of Health and Welfare. (2026). [*Family, domestic and sexual violence: Aboriginal and Torres Strait Islander people.*](#)



recognise the urgent need for targeted, Aboriginal-led responses to address the disproportionate rates of violence experienced by Aboriginal women and children.

Responding to all forms of family violence against Aboriginal women

The Second Action Plan must recognise and respond to all forms of family violence experienced by Aboriginal women and acknowledge the ways these forms of violence are interconnected. Forms of violence that Aboriginal women experience include physical, emotional, sexual, economic, cultural, and systems abuse, as well as coercive control. All forms of family violence against Aboriginal women require stronger prevention, early intervention and accountability responses.

While targeted responses to sexual violence, harassment and stalking are necessary, sexual violence must also be recognised as a key component of family violence. In November 2025, Djirra conducted a legal file review and found that 45 per cent of open legal files included disclosures of sexual harm. Treating sexual violence solely as an issue separate from family violence obscures the reality of many Aboriginal women's experiences and creates additional barriers to accessing support.

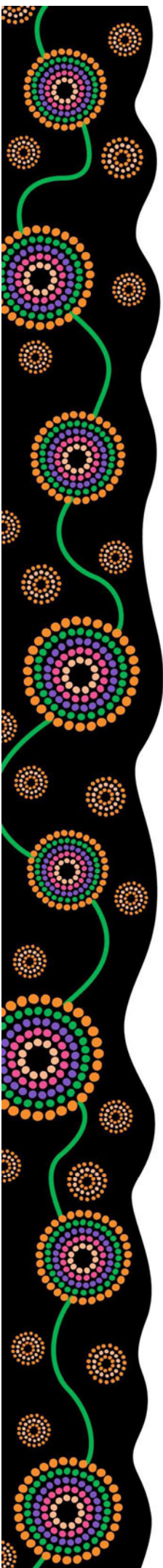
The Second Action Plan must also explicitly recognise systems abuse as a form of family violence and implement safeguards to prevent legal, justice and service systems from being weaponised against Aboriginal women. Djirra has repeatedly highlighted the ways perpetrators use police, child protection, family violence and legal systems to continue exerting power and control over Aboriginal women. For Aboriginal women, systems abuse is often compounded by racism and discriminatory assumptions embedded within institutions and service systems. These experiences contribute to significant mistrust of systems that should provide safety and support.

Cultural abuse must also be recognised as a distinct form of family violence experienced by Aboriginal women. In Djirra's experience, cultural abuse is frequently perpetrated against Aboriginal women, often by non-Aboriginal men, who weaponise a woman's Aboriginality within a broader context of racism and ongoing colonial harm to isolate, dominate and exert power and control. Cultural abuse can include denial of Aboriginal identity, disconnection from Country, racist abuse, and isolation from family, kinship and community networks. Recognising cultural abuse is essential to ensuring responses to violence against Aboriginal women are culturally informed, holistic and capable of addressing the full range of harms experienced by Aboriginal women.

Addressing violence against Aboriginal women as a gendered issue

Violence against Aboriginal women is not an "Aboriginal community issue". It is a gendered form of violence shaped by the ongoing impacts of colonisation, racism, patriarchy and structural inequality.

The Second Action Plan must explicitly recognise family violence against Aboriginal women as a gendered issue and apply an intersectional gender lens across all policies, programs, funding



decisions and initiatives aimed at ending violence against women. The safety of Aboriginal women and children must remain a primary objective of the National Plan and its implementation.

In Djirra's experience, most of the Aboriginal women we support experience family violence from non-Aboriginal men. A review of legal service data over the past five financial years found that 61 per cent of Djirra's legal service clients experienced violence from a non-Aboriginal man. A review of Djirra's 2024-25 non-legal family violence service data found that 50.33 per cent of family violence cases involved a non-Aboriginal man. These findings reinforce the need for governments to understand violence against Aboriginal women as a gendered issue, rather than framing it as an Aboriginal community issue. Responses to violence against Aboriginal women must therefore address the intersecting impacts of gender inequality, racism and colonisation.

Addressing the health impacts of family violence on Aboriginal women

Family violence has profound and enduring impacts on the physical, social, emotional and cultural wellbeing of Aboriginal women. Any strategy to end violence against Aboriginal women must ensure that health, justice, child protection, family violence and social service systems are equipped to recognise and respond to the complex health consequences of violence, and to support Aboriginal women's recovery and healing. In Djirra's experience, acquired brain injury (ABI) and suicidality are among the most serious, yet frequently overlooked, impacts of family violence on Aboriginal women.

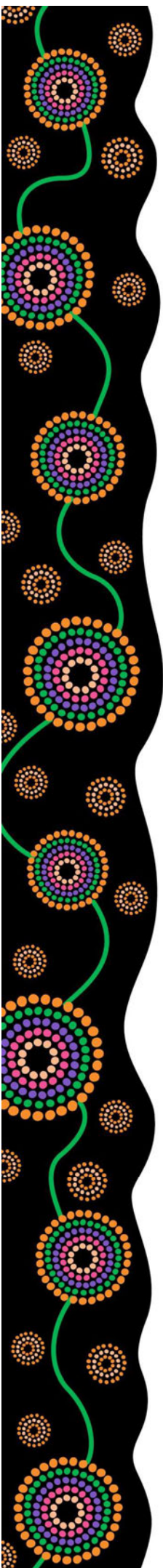
Aboriginal women who experience family violence are at significantly increased risk of ABI, including traumatic brain injury resulting from non-fatal strangulation, assault-related head injuries and repeated physical violence. Aboriginal women are 69 times more likely than other women to sustain a head injury due to assault.¹⁵ Despite this, ABI often remains undiagnosed or overlooked, with symptoms frequently misunderstood by health, justice and child protection systems. As a result, Aboriginal women may not receive appropriate support and may instead face further system involvement or disadvantage. Research also demonstrates higher rates of post-traumatic stress disorder, depression and anxiety among people who have experienced family violence, particularly those living with ABI.¹⁶

These findings reflect Djirra's frontline experience. Aboriginal women regularly disclose experiences of non-fatal strangulation and head, neck and facial injuries caused by perpetrators. Djirra frequently supports Aboriginal women living with ABI, or presenting with symptoms consistent with ABI, following family violence. However, there is currently no consistent approach across service systems to identify ABI in Aboriginal women who have experienced family violence, creating significant barriers to diagnosis, support and recovery.

Family violence is also a significant contributor to suicidality among Aboriginal women. The National Plan and Our Ways both recognise the strong relationship between experiences of

¹⁵ Australian Institute of Health and Welfare (2023). [Suicide and intentional self-harm hospitalisations among First Nations people](#).

¹⁶ Knight et al. (2025). [Brain Injury Within Intimate Partner Violence: What Are the Cognitive Effects?](#). National Library of Medicine.



violence and suicide risk.¹⁷ For Aboriginal women, this risk is compounded by intersecting structural harms including child removal, criminalisation, housing insecurity, racism and barriers to accessing culturally safe supports.¹⁸

This is reflected in national data. Aboriginal women die by suicide at significantly higher rates than other women, and suicide and self-inflicted injuries were the second leading cause of death among Aboriginal women in 2018.¹⁹ While governments have committed under Closing the Gap Target 14 to significantly reduce suicide among Aboriginal and Torres Strait Islander people, the suicide rate for Aboriginal women increased between 2018 and 2023.²⁰

Victorian coronial data further highlights the strong association between family violence and Aboriginal women's deaths by suicide. Evidence indicates that almost 76 per cent of Aboriginal and Torres Strait Islander women who died by suicide between 2009 and 2024 had experienced family violence.²¹ This demonstrates that family violence is not a peripheral factor, but a central and recurring feature in many deaths by suicide among Aboriginal women.

Djirra's own service data reinforces this connection. In 2025, 35 clients self-reported current or recent suicidality during family violence risk assessments undertaken by Djirra's frontline family violence service. Djirra's legal practitioners also regularly support Aboriginal women experiencing suicidal distress or disclosing a history of suicidality in the context of family violence.

These findings underscore the need for integrated, culturally safe responses that recognise ABI, suicidality and mental ill-health as critical consequences of family violence. All service systems must be equipped with the expertise, resources and referral pathways required to identify and respond appropriately to these harms. This includes timely referral to specialist Aboriginal-led services that understand the intersecting impacts of violence, trauma, racism and systemic discrimination.

Specialist Aboriginal FVPLSs, including Djirra, are uniquely placed to provide this support. In addition to improving the capability of mainstream systems to identify and respond to ABI and suicidality, governments must invest in culturally safe healing and mental health supports designed and delivered by Aboriginal organisations.

From 2019 to 2021, Djirra demonstrated the value of embedding culturally safe, trauma-informed counselling within a trusted ACCO through the delivery of a counselling service at Koori Women's Place with short-term government funding. The service removed many of the barriers Aboriginal women commonly face when seeking mental health support. Women did not require a mental health care plan or external referral and were able to access flexible support based on each woman's needs and the counsellor's clinical recommendation.

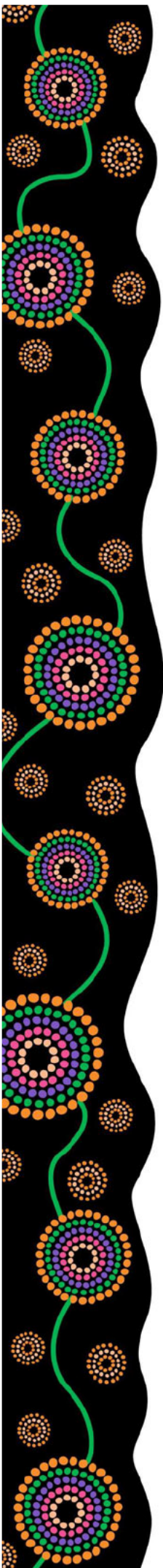
¹⁷ Coroners Court of Victoria. (2025). [Suicides of Aboriginal and Torres Strait Islander people in Victoria, 2020 – 2024](#).

¹⁸ Coroners Court of Victoria. (2024). [Inquest into the passing of XY](#).

¹⁹ Australian Institute of Health and Welfare (2023). [Suicide and intentional self-harm hospitalisations among First Nations people](#).

²⁰ Productivity Commission. (2025). [Closing the Gap: Annual Data Compilation Report](#).

²¹ Coroners Court of Victoria. (2026). [Submission: Parliamentary Inquiry into the relationship between domestic, family and sexual violence and suicide](#).



Demand for the service significantly exceeded expectations, highlighting the need for culturally safe mental health support delivered through trusted Aboriginal organisations. From mid-October 2020, the counsellor delivered 114 appointments against a target of 15, while internal referrals also exceeded expectations. In response, Djirra doubled counselling capacity from two to four days per week using its own flexible funding. The service also attracted referrals from local ACCOs, demonstrating broader community demand for Aboriginal-led counselling and healing supports.

Women who engaged with the service reported healing, reduced anxiety, increased confidence, stronger relationships with their children, greater connection to culture, and a better understanding of family violence and its impacts. The service improved continuity of care for Aboriginal women affected by family violence and strengthened access to Djirra's legal and case management programs and other essential supports, enabling more holistic and coordinated responses for Aboriginal women affected by violence.

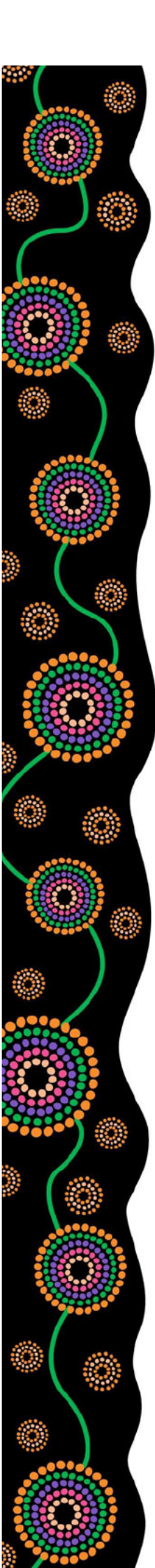
In the absence of dedicated government funding, Djirra's family violence case management team currently contracts an Aboriginal counsellor using a combination of Djirra's own resources and women's Flexible Support Packages (FSPs). Using a woman's FSP to pay for counselling reduces the funding available to meet her other critical safety, healing and recovery needs. This model is neither equitable nor sustainable: women should not have to choose between therapeutic support and practical measures that help keep them and their children safe. Dedicated funding from the Department of Social Services would ensure counselling is available when needed, while preserving FSP funding for its intended safety and recovery purposes.

With sustainable, long-term funding, Djirra could continue and expand the Koori Women's Place counselling service, including for Aboriginal women who are unable to physically access the service and for women in custody. Ensuring access to culturally safe mental health and healing supports at times of acute risk would strengthen suicide prevention efforts, promote recovery and healing from violence and trauma, improve continuity of care, and reduce reliance on fragmented mainstream systems. Investment in Aboriginal-led counselling and healing programs would contribute directly to Closing the Gap Target 14 and strengthen responses to family violence against Aboriginal women.

Case study

Danielle²² is an Aboriginal living with post-traumatic stress disorder and she experiences sensory sensitivity issues when under stress. Djirra's paralegal support worker (PLSW) set up a room with dim lighting and sensory equipment, to assist Danielle to remain calm and able to engage with the hearing. The lawyer made submissions before the Magistrate for an Interim Family Violence Intervention Order (FVIVO), and it was granted. The matter was otherwise adjourned. Danielle's anxiety continued however, so before attempting a debrief, the PLSW brought in a cup of tea and the lawyer asked if she would like to spend some time yarning with a woman from Djirra's Koori Women's Place (KWP) before they continued their conversation. Danielle said she'd love that.

²² Names have been changed to ensure client confidentiality.



The KWP worker and Danielle sat together, still in the dimly lit room, having a yarn about Danielle's Country and family while completing a painting together with art supplies always available in that room. When calm Danielle talked with her lawyer about the next steps in her FVIO matter and together they formulated a plan that empowered Danielle.

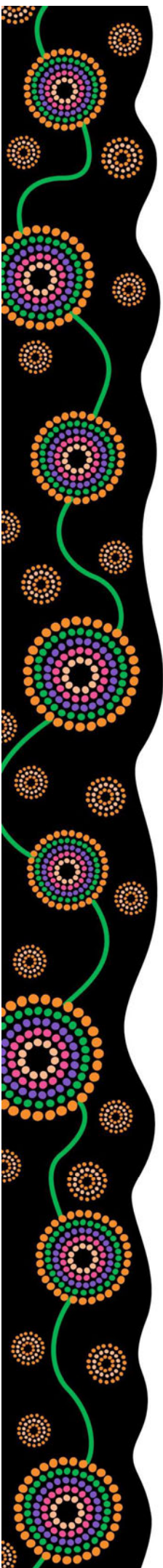
Recommendations

The Second Action Plan must:

1. Explicitly recognise family violence against Aboriginal women as a gendered issue and apply an intersectional gender lens across all policies, programs and initiatives to end violence against women.
2. Address all forms of family and sexual violence against Aboriginal women, including systems abuse and cultural abuse, and explicitly acknowledge their interconnectedness with racism, colonisation and structural inequality.
3. Address barriers to disclosing and reporting violence by strengthening and investing in culturally safe pathways for disclosure, reporting and support that respond to the needs and preferences of Aboriginal women, including through FVPLSs and other specialist family violence service referral pathways.
4. Recognise that supporting Aboriginal women's mental health, recovery and healing is a critical response to family and sexual violence and an essential component of suicide prevention, and invest in culturally safe Aboriginal-led healing, counselling and therapeutic supports.
5. Provide Djirra with adequate, secure, multi-year funding through the Department of Social Services to re-establish and sustain an Aboriginal-led counselling service as a core component of Djirra's integrated family violence response. Funding should support sufficient counselling and administrative capacity, follow-up and referral coordination, and flexible service delivery through both face-to-face and telehealth models. Funding must also meet the current and growing demand.
6. Fund and implement standardised, culturally appropriate Acquired Brain Injury screening for Aboriginal people experiencing family and sexual violence across health and related service systems, with timely referral pathways to specialist Aboriginal-led services such as Djirra and other FVPLSs.

Interconnected Systems: Family Violence, Child Protection, Justice and Housing

The National Plan and Our Ways recognise that responses to family violence must be accessible to, and inclusive of, all Aboriginal women. However, family violence does not occur in isolation. For Aboriginal women, experiences of violence are often deeply interconnected with child protection involvement, housing insecurity, poverty and contact with the justice system. These systems are frequently experienced simultaneously, yet policy, funding and service responses continue to treat them as separate issues.



Improving outcomes for Aboriginal women and children requires governments to recognise these interconnected pathways and invest in coordinated, Aboriginal-led solutions. Child protection, housing and justice reform must therefore be understood as central components of any strategy to end violence against Aboriginal women and children.

Family violence response systems: barriers to reporting and accessing support

The National Plan recognises that culturally safe service delivery is essential to addressing violence against Aboriginal women. Similarly, the Yoorrook Justice Commission recommended that governments strengthen the capability of family violence systems to uphold Aboriginal cultural and human rights.²³

Despite this recognition, Aboriginal women consistently report to Djirra that mainstream family violence services remain culturally unsafe and inaccessible. Experiences of racism, discrimination and cultural unsafety can deter Aboriginal women from seeking support and undermine confidence in services intended to promote safety and recovery.

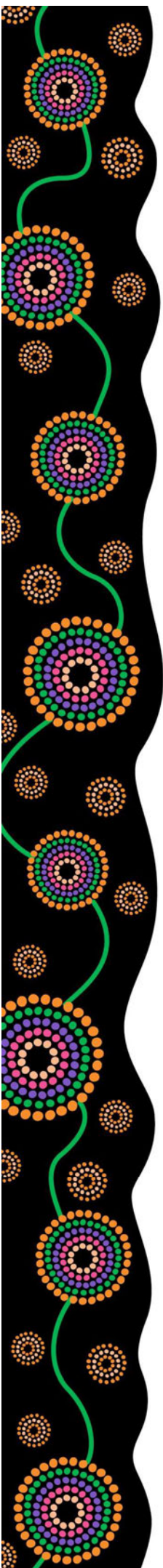
Many Aboriginal women also avoid reporting violence or seeking support because of well-founded fears about the consequences of disclosure. Women frequently describe concerns that seeking help may result in police involvement, child protection intervention, misidentification as a perpetrator of violence, or further system involvement beyond their control. These fears are often shaped by personal and community experiences and can create significant barriers to accessing assistance at the earliest opportunity.

Aboriginal women also commonly experience racism and additional barriers to reporting and disclosing violence to police, particularly where the perpetrator is non-Aboriginal. Djirra regularly supports Aboriginal women who recall police minimising violence, failing to believe them, or refusing to take victim statements. Even where statements are taken, women often report that police make little effort to properly investigate violence or hold perpetrators accountable. As a result, many Aboriginal women do not report family violence to police because they do not expect to be believed, taken seriously or protected. These concerns are often well-founded and reflect both personal and community experiences of inadequate police responses to violence against Aboriginal women.

These barriers are particularly pronounced for Aboriginal women who have experienced sexual violence. In Djirra's experience, sexual violence is significantly underreported, and many Aboriginal women disclose sexual violence through Aboriginal-led services years after the violence occurred, rather than through police or mainstream service systems. In many cases, it is the first time a woman has spoken about the violence she has experienced.

Such disclosures are often only possible because Aboriginal-led services provide culturally safe environments where women are given the time, trust and support needed to share their

²³ Yoorrook Justice Commission. (2025). [Yoorrook for Transformation: Summary Report](#).



experiences. Aboriginal women consistently tell Djirra that being heard, believed and understood is critical to feeling safe enough to seek support.

Fear of child removal remains one of the greatest barriers preventing Aboriginal women from accessing family violence services. Aboriginal women regularly report reluctance to engage with services where child protection involvement is likely, or perceived to be likely, particularly where family violence and child protection functions are closely connected. Some Aboriginal mothers have told Djirra that they feel less comfortable or safe accessing family violence services through multi-service entry points, such as Victoria's Orange Door network, due to the presence of child protection workers and mandatory reporting obligations. These women often fear that engaging with services connected to the child protection system may lead to increased scrutiny of their parenting, child protection intervention, or ultimately the removal of their children. Given the disproportionate rates of child protection involvement experienced by Aboriginal families, these concerns are often well-founded and can deter women from seeking assistance at the earliest opportunity.

These concerns are further compounded in Victoria where some ACCOs have been delegated child protection powers under section 18 of the *Children, Youth and Families Act 2005* (Vic). Djirra has consistently warned that transferring punitive statutory child protection functions to ACCOs, without broader structural reform of the child protection system, risks shifting harm rather than improving outcomes. Amendments to the Act in 2022 expanded the capacity of some ACCOs to investigate and intervene following notifications, creating potential conflicts of interest and confidentiality concerns, particularly in smaller regional and remote communities.

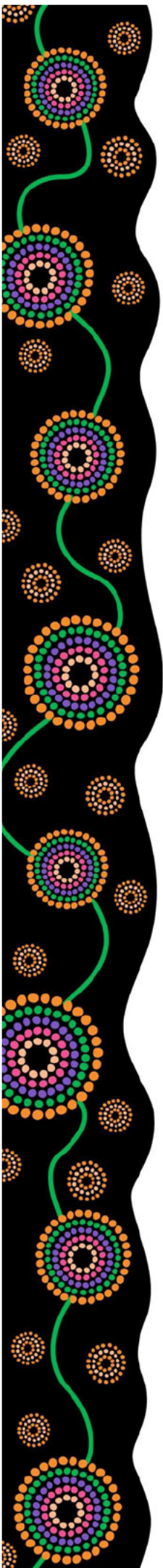
Rather than facilitating disclosure and safety, service models that are perceived as extensions of the child protection system can discourage help-seeking and deepen mistrust. This highlights the importance of maintaining clear, culturally safe pathways to support that Aboriginal women can access without fear of punitive intervention.

These experiences demonstrate the importance of investing in Aboriginal-led family violence responses. Djirra and other FVPLSs are uniquely positioned to provide culturally safe pathways to support and to help Aboriginal women navigate the intersecting systems that shape their lives.

The Second Action Plan should prioritise culturally safe, client-centred services for Aboriginal women and children, while also investing in measures that strengthen the cultural capability of the broader family violence workforce and address the systemic barriers that continue to prevent Aboriginal women from accessing support.

Child protection: Keeping Aboriginal mothers and children safe and together

Family violence is a leading driver of child protection involvement and child removal for Aboriginal families. In 2023–24, over 70 per cent of child protection matters involving Aboriginal children were substantiated on the basis of physical, sexual or emotional abuse, including exposure to



family violence.²⁴ Alarming, in the same period, the rate of Aboriginal children in out-of-home care in Victoria was 90.5 per 1,000 children – almost double the national average.²⁵ Punitive child protection responses create pathways into the justice system, with Aboriginal children in out-of-home care at significantly higher risk of entering youth and adult custody.²⁶

Too often, child protection systems respond to the consequences of family violence by separating Aboriginal women and children rather than addressing the violence itself. As a result, Aboriginal mothers who have experienced family violence can become further entangled in statutory systems. For Aboriginal children, removal can disrupt critical connections to family, community, culture and Country that support safety, identity and wellbeing. Given that the majority of Djirra's clients experience family violence perpetrated by a non-Aboriginal partner, Aboriginal mothers are often the primary source of a child's connection to culture, family and community. Policies and systems that separate Aboriginal children from their mothers can therefore undermine a key protective factor for Aboriginal children.

Removal is often framed as a protective response. However, governments must recognise that out-of-home care can itself expose Aboriginal children to significant further harm. In addition to the trauma associated with separation from family and community, Aboriginal girls in out-of-home care are at increased risk of sexual assault and sexual exploitation.²⁷

Keeping Aboriginal mothers and children safe and together must therefore be a central objective of efforts to end violence against Aboriginal women and children. Improving safety for Aboriginal women is critical to reducing child protection involvement and improving outcomes for Aboriginal children.

Governments must invest in Aboriginal-led family preservation, reunification and restoration programs that support families before crisis occurs, prevent unnecessary removals, and reunite children with family wherever it is safe to do so. Where children have already been removed, families must have access to timely, culturally safe reunification supports that address the underlying impacts of family violence, trauma and disadvantage.

Case study

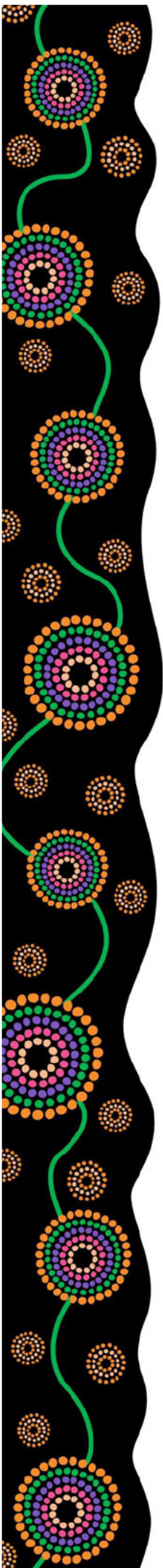
Djirra worked with an Aboriginal mother providing intensive case management for her alcohol and other drug issues. Djirra coordinated the case team, coordinated care, and invited the Child Protection worker to case meetings. The progress she made with Djirra's culturally safe, warm-up and support meant the child was returned to her care within a month.

²⁴ Australian Institute of Health and Welfare. (2025). [Child protection 2023 – 24: Aboriginal and Torres Strait Islander Children](#)

²⁵ SNAICC - National Voice for our Children. (2025). [Family Matters Report 2025](#).

²⁶ Sentencing Advisory Council. (2019). [Crossover Kids: Vulnerable Children in the Youth Justice System Report 1: Children Who Are Known to Child Protection among Sentenced and Diverted Children in the Victorian Children's Court](#).

²⁷ Australian Government. (2026). [Our Ways - Strong Ways - Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic, and Sexual Violence 2026-2036](#).



Victoria's *Children, Youth and Families Amendment (Stability) Act 2026* (Stability amendments) was a critical reform to address the significant over-representation of Aboriginal children in out-of-home care. In Victoria, Aboriginal children are over 20 times more likely to be removed from their mothers than other children. Under the previous legislation, parents were only given 12, or at most 24, months to have their children returned to their care. After this period, the children could be permanently removed.²⁸

Djirra continues to witness the devastating impacts of these provisions on Aboriginal families, which fail to account for the reality that healing from trauma and family violence cannot occur within arbitrary timeframes. The Stability amendments removed these rigid reunification timeframes and restored discretion to the Children's Court to extend orders whenever this is in a child's best interests.²⁹

It is critical to recognise that healing from family violence and intergenerational trauma takes time. Family violence responses should therefore prioritise keeping Aboriginal women and children safe and together wherever possible, reducing unnecessary child removals and supporting recovery, healing and cultural connection.

Case study

A four-year-old child was removed from his mother's care and went through nine out-of-home care placements in less than three months. When he reported abuse from a carer, Djirra had to push for an investigation to occur. Only after receiving extensive support and advocacy from Djirra, was he returned to his mother's care. Djirra is continuing to monitor the departmental investigation.

Keeping Aboriginal mothers and their children together in custodial settings

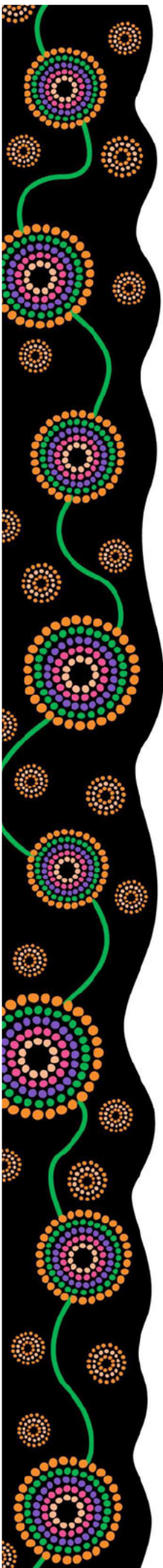
Djirra also supports the expansion of programs that enable Aboriginal mothers and young children to remain together in custodial settings. Programs such as *Living with Mums* recognise the importance of attachment, cultural connection and healing. Keeping Aboriginal mothers and children together, wherever it is safe to do so, should be a central objective of both family violence and child protection responses. However, Djirra's Legal Team is concerned that access to the *Living with Mums* program remains limited, preventing many Aboriginal mothers in custody from participating despite the demonstrated importance of maintaining maternal attachment, cultural connection and family relationships.

Establish a Child Protection Notification and Referral System (CPNRS)

Women experiencing family violence should not be expected to navigate complex child protection systems alone. Yet many Aboriginal women continue to enter child protection processes without legal representation, advocacy or culturally safe support.

²⁸ Victorian Government. (2014). [Children, Youth & Families \(Permanent Care & Others Matters\) Amendment Act 2014 \(Vic\)](#).

²⁹ Victorian Government. (2026). [Children, Youth and Families Amendment \(Stability\) Act 2026 \(Vic\)](#).



The National Plan recognises that ending violence against women and children involves establishing effective referral pathways to ensure Aboriginal women receive follow-up and ongoing support at the earliest time. The Yoorrook Justice Commission received evidence that pre-birth reports often do not lead to support for pregnant Aboriginal women and instead are the precursor for their child's entry to the child protection system.³⁰ This is a significant systemic failure—punitive responses are seemingly preferred to early intervention and prevention services to pregnant Aboriginal women.

Access to culturally safe legal assistance and holistic support at the earliest possible stage can fundamentally change the trajectory of a child protection matter. It enables Aboriginal women to understand their rights, access legal and non-legal support, and navigate complex child protection systems. This can reduce the likelihood of child removal and improve prospects for family preservation and reunification.

For this reason, Djirra has long advocated for the establishment of a CPNRS in Victoria.

The Yoorrook Justice Commission agrees a system, like Djirra's CPNRS, would benefit Aboriginal women and families to 'navigate the complexity of the child protection system—particularly given the intersections between risk of child protection involvement and homelessness, family violence and other areas of disadvantage.'³¹ As such, the Commission recommended that child protection automatically notify an Aboriginal legal service when a pre-birth report is made concerning an Aboriginal woman, or when a report about an Aboriginal child is substantiated (a report investigated by child protection that concluded on reasonable grounds that a child has suffered, is suffering, or is at risk of significant harm, and is in need of protection).³² Two Aboriginal legal services operate in Victoria – Djirra and the Victorian Aboriginal Legal Service (VALS). Djirra and VALS have proposed that to operationalise the CPNRS, all referrals for Aboriginal mothers and non-Aboriginal mothers of Aboriginal children should be directed to Djirra, and all referrals for other parents and carers of Aboriginal children should be directed to VALS.

While child protection systems differ across jurisdictions, the Second Action Plan should support nationally consistent referral pathways, like a CPNRS, that ensure Aboriginal women can access culturally safe legal and non-legal support at the earliest point of contact with child protection systems. Government could achieve this by establishing national standards or investing in an Aboriginal-led, nationally consistent CPNRS.

Case study

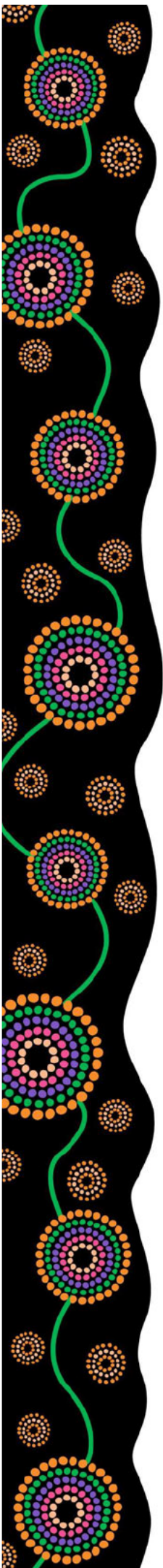
Just before Kelly* gave birth, she and her partner John*³³ were contacted by a child protection practitioner, who stated there were concerns for their parenting capacity, family violence and drug use. Child protection's concerns were based on previous child protection involvement with

³⁰ Yoorrook Justice Commission. (2023). [*Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems*](#).

³¹ Yoorrook Justice Commission. (2023). [*Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems*](#). p. 149.

³² Yoorrook Justice Commission. (2023). [*Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems*](#). (Recommendation 12, p. 31).

³³ Names have been changed to ensure client confidentiality.



Kelly and John's older children, without any recent evidence to support concerns for the baby. There had been no family violence incident between Kelly and John, no police records, and no concerns raised by hospital staff.

Once Kelly gave birth, child protection filed a Protection Application, removed the baby from Kelly and John's care, and placed the baby with a non-Aboriginal foster carer. The process which required many appointments caused financial and emotional stress to Kelly and John. The Children's Court proceedings triggered a referral to Djirra's Legal Service, at which point, Djirra's lawyer supported Kelly to understand the Children's Court orders and processes, including the conditions set by child protection.

Djirra's lawyer advocated for the baby to be immediately returned to Kelly's care, as there was no evidence to support child protection's concerns. After four months, child protection agreed and withdrew the application. However, this could not rectify the trauma caused by removal and the months of bonding that Kelly, John and their baby were denied. Had Kelly been referred to Djirra for early legal advice, her baby's removal and the damage it caused, could have likely been avoided.

Justice: Addressing the criminalisation of Aboriginal women experiencing violence

The National Plan recognises that the justice system can contribute to the misidentification and criminalisation of Aboriginal women experiencing family violence. Improving justice responses and ensuring equitable outcomes for Aboriginal women must therefore be a core component of the Second Action Plan.

Too often, Aboriginal women who experience family violence are criminalised rather than protected by justice systems. Rather than receiving safety, support and justice for the violence perpetrated against them, many Aboriginal women come into contact with police, courts and prisons as a direct consequence of that violence. For many Aboriginal women, justice systems operate not as pathways to protection, but as sources of further surveillance, intervention and harm.

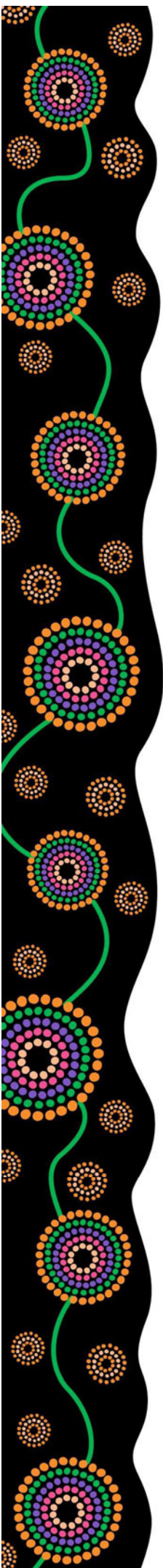
Aboriginal women remain dramatically overrepresented in the justice system. Aboriginal women are more likely to be remanded and imprisoned,³⁴ and are the fastest-growing prison population in Australia.³⁵ In Victoria, Aboriginal women were 17.4 times more likely to be imprisoned than non-Aboriginal women in 2024-25.³⁶ As at June 2026, Aboriginal women comprised 17.2 per cent of Victoria's female prison population,³⁷ despite comprising only around 1 per cent of the

³⁴ Crime Statistics Agency Victoria. (2025). [Aboriginal justice indicators dashboard](#).

³⁵ Australian Human Rights Commission. (2024) [Statistics about Aboriginal and Torres Strait Islander women and girls](#).

³⁶ Victorian Government. (2026). [Victorian Government Aboriginal Affairs Report 2025: Goal 15: Aboriginal over-representation in the justice system is eliminated](#)

³⁷ Corrections Victoria. (2026). [End of month number of Aboriginal and Torres Strait Islander people in prison by gender and warrant status, June 2026](#); Corrections Victoria. (2026). [Monthly prison and community corrections statistics, June 2026](#).



Victorian female population.³⁸ Nationally, Aboriginal women are imprisoned at 21.2 times the rate of non-Aboriginal women and are more than five times more likely to be charged for minor, non-violent offences and receive harsher sentences.³⁹ This striking overrepresentation highlights the extent to which Aboriginal women continue to be disproportionately drawn into the justice system. Further, between 70 and 90 per cent of Aboriginal women in custody have experienced family violence,⁴⁰ demonstrating the pervasive connection between victimisation and criminalisation.

These figures demonstrate that many Aboriginal women entering the justice system are not entering as perpetrators of serious offending, but as women who have experienced violence, trauma, poverty, homelessness and ongoing systemic disadvantage.

Restrictive bail laws across Australia have further contributed to the growing overrepresentation of Aboriginal women in custody. In Victoria, the 2025 amendments to the *Bail Act 1977 (Vic)* have resulted in increasing numbers of Aboriginal women being held on remand, undermining progress towards Closing the Gap Targets 10 and 11. In June 2026, 56.09 per cent of Aboriginal women in custody were held on remand, compared with 49.15 per cent of other women.⁴¹

Djirra has witnessed the impacts of these trends directly through our Prison Support Program, which provides culturally safe legal and non-legal support to Aboriginal women in custody who have experienced family violence. Since the removal of detention as a last resort, demand for this program has increased by 80 per cent, reflecting the increasing number of Aboriginal women being drawn into custody through punitive justice responses.

Governments must shift investment away from punitive justice responses and towards Aboriginal-led early intervention, legal assistance and holistic support services. Supporting Aboriginal women to access safety, housing, legal assistance and culturally safe family violence responses before crises escalate is critical to reducing criminalisation and imprisonment.

The Second Action Plan is an opportunity for the Federal Government to demonstrate national leadership by urging states and territories to repeal punitive laws and justice system responses, and to not introduce future punitive laws and policies that disproportionately criminalise Aboriginal women experiencing family violence, poverty, homelessness, racism, misidentification and other forms of disadvantage. Recent amendments to Victoria's bail laws provide a clear example of reforms that risk further increasing the overrepresentation of Aboriginal women in custody.

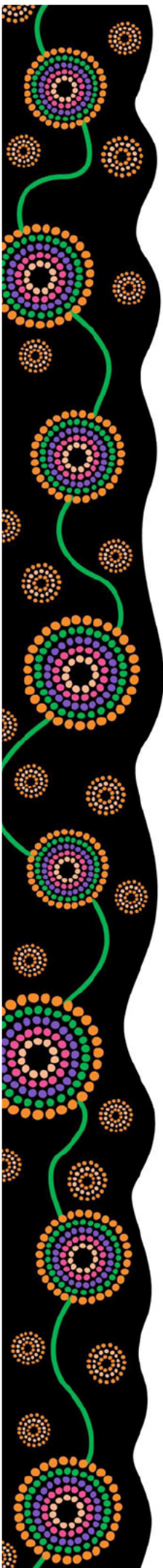
Alongside legislative reform, the Second Action Plan should support increased investment in Djirra's Prison Support Program and other comparable Aboriginal-led initiatives that provide culturally safe support to Aboriginal women in custody. These programs play a critical role in supporting Aboriginal women who have experienced family violence, addressing the harms

³⁸ Australian Bureau of Statistics. (2021). [Victoria 2021 Census Aboriginal and/or Torres Strait Islander people QuickStats](#). Australian Bureau of Statistics. (2021). [2021 Census All persons QuickStats](#).

³⁹ Australian Human Rights Commission. (2024) [Statistics about Aboriginal and Torres Strait Islander women and girls](#).

⁴⁰ ANROWS. (2020). [Women's imprisonment and domestic, family and sexual violence: Research Synthesis](#).

⁴¹ Corrections, Prisons and Parole. (2026). [Monthly time series prison and community corrections data](#).



associated with criminalisation and imprisonment, strengthening connections to community and culture, and supporting safe reintegration following release.

Case study

Belle⁴² felt unsupported by the criminal justice system and found it overwhelming to navigate this alone. She stated, "A lot of big things happened that I didn't understand." Djirra's legal team were able to help Belle navigate complex court processes and explain legal jargon and documents. This ensured Belle could meaningfully participate in the proceedings and understand her rights. Belle states "[the lawyers] had good communication. They would explain things, so I understood." Belle's Djirra lawyers also helped to ensure that any further risks of re-traumatisation throughout the proceedings were reduced. Belle stated, "Djirra helped me to have my voice heard and I felt protected and safe throughout this long process."

Misidentification

Misidentification is a systemic failure reflecting racism toward women who often find themselves entrapped by systems.⁴³ Misidentification remains one of the most significant systemic barriers to safety for Aboriginal women experiencing family violence. The Second Action Plan must therefore recognise misidentification as both a family violence issue and a justice issue.

In Djirra's experience, Aboriginal women experiencing family violence are frequently racially targeted and misidentified as the primary aggressor. A 2023 casework review found at least 24 per cent of Aboriginal women were wrongly identified as perpetrators in family violence incidents. Misidentification is not a simple error but the result of systemic policing failures, including inadequate investigations, false reports by perpetrators, incident-based responses that miss patterns of family violence, and a failure to accurately identify resistance, self-defence or trauma responses.⁴⁴

When women are wrongly identified as perpetrators, they are often criminalised, excluded from victim support services, and exposed to further harms such as housing and employment loss, child removal, legal stress, isolation, growing distrust of systems and declining mental health.⁴⁵

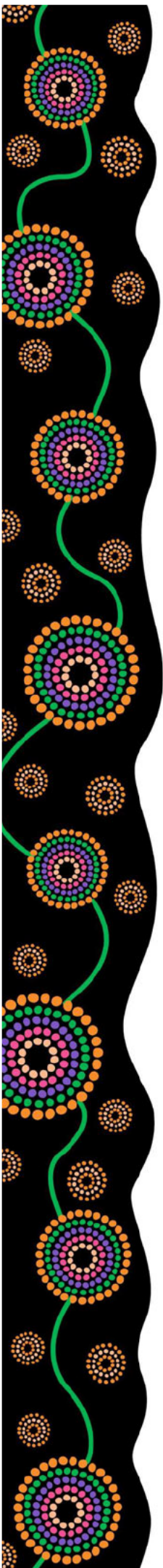
Given the prevalence of misidentification and significant impact on Aboriginal women, Djirra has commissioned the Centre for Innovative Justice to conduct research into ways to prevent misidentification and address its harms. The outcomes of this work will help inform future policy and investment and support the development of culturally safe responses that better identify and protect Aboriginal women experiencing family violence.

⁴² Names have been changed to ensure client confidentiality.

⁴³ Australian Government. (2026). *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026-2036*.

⁴⁴ Family Violence Reform Implementation Monitor. (2021). *Monitoring Victoria's Family Violence Reforms: Accurate identification of the predominant aggressor*; Safe & Equal. (2024). *Working with Misidentified Victim Survivors: A practice resource for family violence practitioners*.

⁴⁵ ANROWS. (2020). *Accurately Identifying the 'Person most in need of protection' in domestic and family violence law*.



Case study

After many years of family violence from Christopher* towards Trish*⁴⁶, an incident occurred which resulted in mutual safe contact final Family Violence Intervention Orders (FVIOs) being made. Police had applied for the FVIO against Trish, misidentifying her as the primary aggressor. Trish consented to this without legal assistance, not really understanding what it meant. Trish later filed a cross-application against Christopher.

A few months later, another incident occurred and Christopher strangled Trish while the children were in the home. Both Christopher and Trish contacted police; the FVIOs were varied by police to 'no contact' and child protection became involved.

Trish called Djirra's Legal Service for assistance with the family violence and child protection matters. Trish was supported by a Djirra lawyer, who advised Trish on the legal matters and advocated on her behalf, resulting in police withdrawing the FVIO against Trish and pursuing a longer-term application against Christopher. Christopher was later charged for breaching the FVIO and physical assault, including strangulation.

Without Djirra's intervention, police may have continued to misidentify Trish as the primary aggressor, placing her at risk of criminalisation, child protection involvement and further family violence.

Family law and access to justice

The impacts of family violence, criminalisation and systemic bias also extend into the family law system.

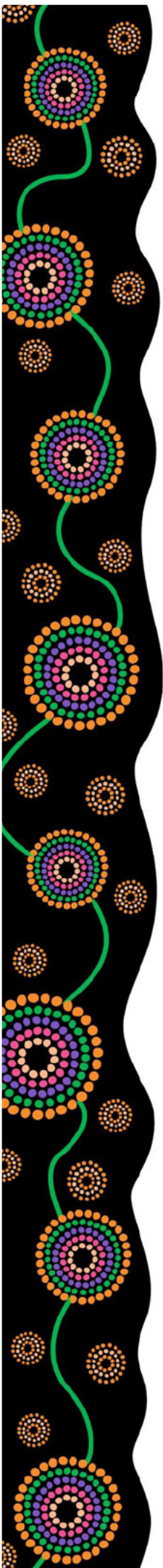
There are many barriers to Aboriginal women safely accessing the family law system. These include systemic racism within the child protection system, systems abuse from perpetrators of violence, fear of child removal, and a lack of understanding legal rights under the family law system.

When Aboriginal women are able to access the family law system, there is often little understanding by practitioners and judicial officers, of how past police and child protection responses have operated and continue to punish, judge and fail to protect Aboriginal women and children. Unlike Victoria's *Family Violence Protection Act 2008 (Vic)*,⁴⁷ the *Family Law Act 1975 (Cth)* (Family Law Act) does not explicitly recognise systems abuse as a form of family violence, and does not require decision makers to consider whether parties may have been misidentified. These gaps allow perpetrators to abuse the family law system, compounding the harms that Aboriginal women and children have experienced and resulting in unjust decisions being made that compromise Aboriginal women and children's safety.

Further, Court Child Experts (CCE) often lack cultural knowledge or understanding of the impacts of colonisation in relation to Aboriginal women and the justice system. In Djirra's experience,

⁴⁶ Names have been changed to ensure client confidentiality.

⁴⁷ Victorian Government. (2026). [Family Violence Protection Act 2008 \(Vic\)](#) [Section 5 (2) (da) – (db)].



CCEs often hold Aboriginal mothers to unrealistic and unfair standards, being highly critical of mothers' past or current circumstances, while overlooking or excusing even very serious violence or other risk factors by fathers. CCEs, judicial officers and practitioners acting in family law matters must receive ongoing family violence and cultural capability training, delivered by specialist Aboriginal-led family violence and legal services.

Case study

Britney had multiple Intervention Orders (IVOs) made to protect her from a long history of family violence. During an argument, the perpetrator called the police, who then misidentified Britney and sought an IVO against her. Her children were placed in the perpetrator's primary care and Britney was removed from the home. Djirra assisted Britney to file her own IVO application against the perpetrator and support Britney to commence urgent Family Law proceedings.

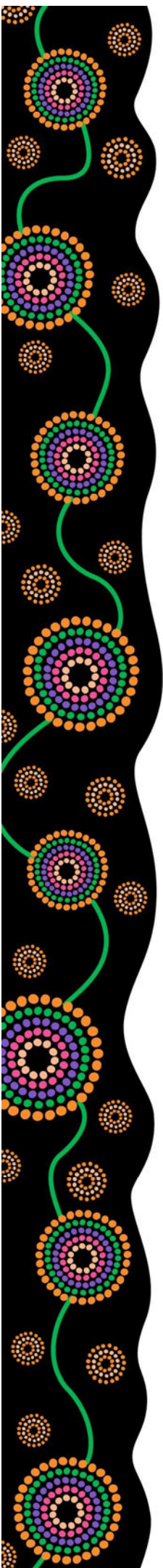
A Court Child Expert (CCE) was appointed to prepare a Child Impact Report in the Family Law proceedings. The CCE was very dismissive of Britney, making comments that did not understand family violence and the impacts of misidentification. Britney felt the process did not promote her self-determination and that the CCE was not trauma-informed or culturally aware. Ultimately, the CCE's report was not favourable to Britney and included limited reference to the violence she experienced.

Britney said she has no trust in the IVO or Family Law systems. She expressed that she was grateful to have Djirra in her corner providing legal assistance, to help her navigate the incredibly overwhelming court processes and hearings.

Access to justice remains a significant issue. Djirra is reliant on Victoria Legal Aid (VLA) grants to pay for barristers to represent clients in family law proceedings, which have complex and costly defended hearings and disbursements, including psychological reports and hair follicle testing.

In Djirra's experience, VLA means and asset testing is restrictive meaning that many Aboriginal women are forced to choose between economic security and access to justice – as whilst they are ineligible for aid, they are also unable to afford a private lawyer. Further, Djirra regularly works with clients who work within the family violence, ACCO and justice sectors who are ineligible for aid due to their income or assets being "too high" (often because they are saving for more secure housing or a vehicle, rather than exceeding the income or asset threshold). If these women were to leave the workforce, this would undermine the National Plan's objective to strengthen the family violence and prevention workforce, as well as be a loss for these sectors and the people they help who benefit from our client's knowledge and lived experience. Further, resolving family law issues is critical to reducing the risk of ongoing post-separation family violence and preventing harm to children arising from the conflict between parents during proceedings.

Building the cultural capability of the legal sector to support Aboriginal women is critical



Addressing criminalisation, misidentification and systemic discrimination requires investment not only in legal assistance for Aboriginal women, but also in the capability of the broader legal profession.

Djirra is currently developing a comprehensive training approach for the legal sector, which will ensure the gendered nature of violence and voices of Aboriginal women and children remain central to cultural capability development. Djirra delivered a trial in October 2025, and we are currently developing further intensive cultural training for lawyers in areas of family violence, family law and child protection as we recognise there is a significant lack of cultural awareness in these practice areas.

The Second Action Plan should support investment in Aboriginal-led cultural capability initiatives across police, courts, legal services and the broader justice sector. Strengthening the capacity of legal and justice systems to respond appropriately to Aboriginal women experiencing violence is essential to reducing criminalisation, improving access to justice and achieving the National Plan's vision of ending violence against Aboriginal women and children.

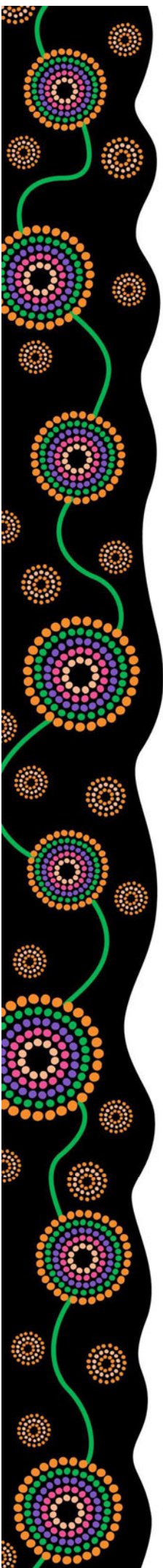
Housing and economic support: Keeping Aboriginal women safe from violence

The National Plan recognises that housing is essential to ending violence against women and children. As at June 2026, 33 per cent of Djirra's legal clients were homeless or at risk of homelessness. An April 2026 review found over 83 per cent of our legal prison support clients will not have a home to go to upon their release from custody. The lack of safe, stable and culturally appropriate housing prevents Aboriginal women from leaving violence, undermines recovery, contributes to poor mental health, and increases contact with child protection and justice systems.

Safe, stable and culturally appropriate housing is one of the most effective ways governments can support Aboriginal women and children to escape violence, recover from violence and remain safe and connected to family, community, culture and Country.

Family violence is a key driver of homelessness for Aboriginal women, while a lack of safe and affordable housing is one of the most significant barriers preventing women and children from escaping violence. Djirra's frontline experience reflects this reality. Women escaping violence are often placed in temporary motel accommodation for extended periods, sometimes for months or years, without adequate cultural, safety or mental health supports. In regional and rural areas, Aboriginal women may be offered temporary accommodation such as caravans or tents, or required to relocate away from Country, community and family in order to access housing. These responses can increase isolation and reduce access to culturally safe support networks at a time when women are recovering from violence.

Housing insecurity is also a key pathway into child protection involvement. Secure housing is often a prerequisite for retaining or regaining care of children, leaving some Aboriginal women trapped between unsafe housing, homelessness and the risk of child removal. Housing insecurity



also interacts with other systems that Aboriginal women must navigate following family violence. Secure housing is often a prerequisite for retaining or regaining care of children. As a result, Aboriginal women can find themselves trapped between unsafe housing, homelessness and the risk of child removal.

Racism and discrimination within housing and homelessness systems create additional barriers. Aboriginal women continue to experience discrimination in the private rental market, severe shortages of crisis and long-term housing, and rising housing costs, particularly in regional and rural areas.⁴⁸ Housing systems also intersect with child protection and justice systems in ways that can increase harm. Temporary accommodation may be deemed unsuitable by child protection authorities, while returning to a violent home to avoid homelessness can also be used against women. Governments must increase investment in long-term, culturally safe housing options for Aboriginal women and children escaping violence, including housing that supports family preservation, reunification and connection to Country, family and community.

Financial insecurity is a significant barrier to safety for Aboriginal women experiencing family violence, particularly where violence has involved financial abuse, economic control or coercive control. Women escaping violence often require immediate financial assistance to secure accommodation, meet essential living costs and establish independent households.

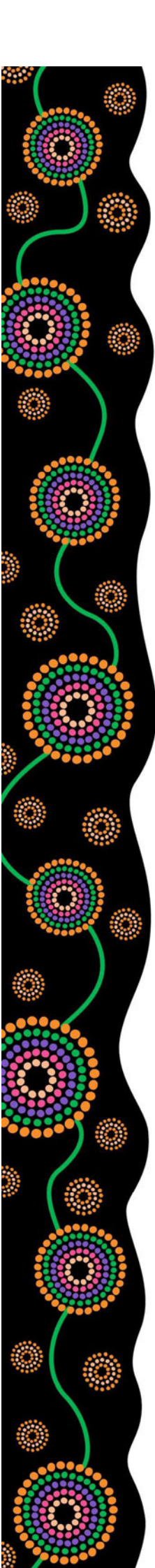
The Leaving Violence Program, delivered by the Department of Social Services and Telstra Health, provides up to \$5,000 in financial support for eligible women to help them leave a violent relationship and relocate to a safe household.⁴⁹ Women fleeing violence frequently require urgent financial assistance. Aboriginal women currently report processing delays of five weeks or longer and complex administrative processes impact of women's ability to access safety. Further, \$5,000 is often not sufficient to cover the many expenses women need to seek safety.

Djirra remains concerned that Telstra Health, a mainstream private telecommunications company, was awarded the tender to deliver the Leaving Violence Program. Programs of this nature must be delivered by organisations with specialist family violence knowledge, cultural capability and a demonstrated commitment to self-determination. Djirra maintains its longstanding position that funding for the Leaving Violence Program should be redirected to FVPLSs delivering specialist frontline support to Aboriginal women escaping violence.

The current Centrelink payments rates are insufficient for many women experiencing family violence and attempting rebuild stability. Aboriginal women also often report to Djirra that their Centrelink payments are suspended during periods of crisis when women are not able to comply with rigid job seeking and study requirements. Women then experience difficulties restoring payments once cancelled. We also often hear of a lack of understanding of the impacts of family violence within job agencies that women are required to engage with under mutual obligations. Women are provided jobs which were unsuitable given their trauma histories, for example a job which requires working within a confined space which can be triggering and unsafe. Having family

⁴⁸ Parliament of Victoria. (2023). [Report of the Parliamentary Inquiry into the Rental and Housing Affordability Crisis](#); Department of Families Fairness and Housing. (2023). [Rental Report](#).

⁴⁹ Department of Social Services. (2026). [Leaving Violence Program](#).



violence liaisons within mutual obligation job agencies would offer women a safe way for women to speak about their experience of family violence and seek support and advocacy so that they are offered suitable and safe job.

Housing security and economic security are fundamental prerequisites for safety. The Second Action Plan must recognise that Aboriginal women cannot leave violence without access to safe housing, adequate income support and timely financial assistance. Investment in Aboriginal-led housing, homelessness and financial support responses is therefore critical to preventing violence, reducing homelessness, supporting family preservation and improving long-term outcomes for Aboriginal women and children.

Recommendations

The Second Action Plan must:

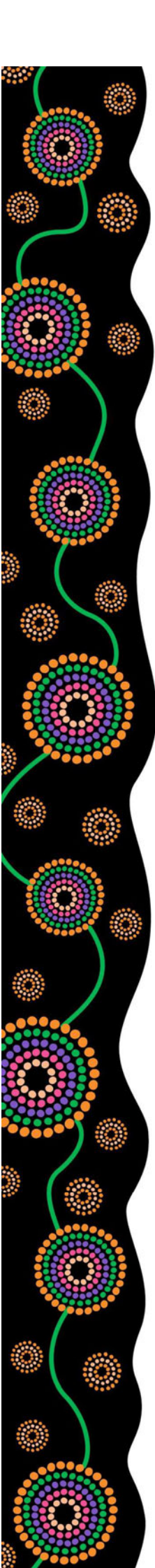
Child Protection

1. Acknowledge gender-based violence against Aboriginal women as the main driver of the removal of Aboriginal children.
2. Establish national standards and programs to prevent the removal of Aboriginal children and support reunification, including by establishing Child Protection Notification and Referral Systems as per Yoorrook for Justice recommendation 12, to ensure Aboriginal women receive specialist, culturally safe legal assistance from FVPLSs as soon as child protection becomes involved.⁵⁰
3. Prioritise funding to keep Aboriginal mothers and children safe and together wherever possible, by:
 - Recognising that improving safety for Aboriginal women is critical to reducing child protection involvement and improving outcomes for Aboriginal children; and
 - Expanding programs that support Aboriginal mothers and children to remain safely together, including in custodial settings.

Justice

4. Urge States and Territories to repeal punitive laws and justice system responses, and to not create future punitive laws and responses, that disproportionately criminalise and punish Aboriginal women who experience family violence, poverty, homelessness, racism, misidentification and racial targeting, and other forms of disadvantage.
5. Address misidentification and other forms of racial targeting by police by requiring that all Aboriginal women involved in a family violence incident are referred to an FVPLS to receive specialist legal assistance.
6. Call for increased investment in Djirra's Prison Support Program and other specialist, culturally safe prison, recovery and reintegration programs for Aboriginal women who have experienced family violence.

⁵⁰ Yoorrook Justice Commission. (2023). [*Yoorrook for Justice: Report into Victoria's Child Protection and Criminal Justice Systems*](#). (Recommendation 12, p. 31).

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7. Increase access to legal aid funding for Aboriginal women experiencing family violence by introducing more flexible means and assets testing requirements and higher limits.
 8. Amend the *Family Law Act 1975 (Cth)* to include systems abuse as a form of family violence and require that judicial officers presiding in the Federal Circuit and Family Court of Australia consider systems abuse, misidentification and systemic racism when making decisions affecting Aboriginal women and children.

Housing and economic support

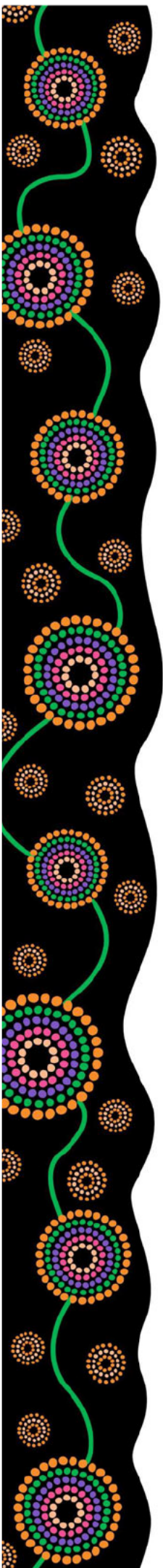
9. Increase investment in Aboriginal-led and Aboriginal-specific crisis, transitional and long-term housing responses that support Aboriginal women and children to escape and recover from violence, remain safe and together, and stay connected to family, community, culture and Country.
10. Invest in FVPLSs and other specialist family violence services to improve coordination between family violence, housing and child protection systems to ensure women are not forced to choose between violence, homelessness and child removal.
11. Address systemic barriers, including racism and discrimination within housing and homelessness systems, that prevent Aboriginal women from accessing safe accommodation.
12. The Commonwealth take immediate steps to provide income support and financial safety net to Aboriginal and Torres Strait Islander women escaping family violence, including but not limited to:
 - Providing an automatic exemption from mutual obligation requirements, to seek employment or complete study, when an Aboriginal woman is experiencing family violence.
 - Aboriginal women who have experienced family violence must have access to a culturally safe family violence liaison to support them in the job seeking process and ensure suggested roles are safe and appropriate.
 - Immediately end contractual obligations to Telstra Health in relation to the Leaving Violence Program and redirect this funding to FVPLSs delivering specialist services on the ground to Aboriginal women escaping violence.

Conclusion

Aboriginal women continue to experience unacceptable rates of family violence, child removal, homelessness, criminalisation and systemic racism. These issues are interconnected and cannot be addressed through isolated policy reforms.

The most effective solutions are Aboriginal-led. Governments must invest in self-determination, specialist ACCOs, early intervention and prevention, housing, legal assistance, cultural healing and systemic reform.

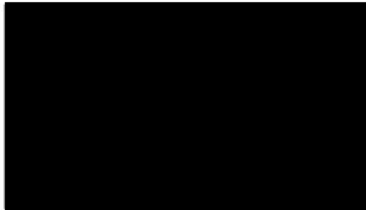
Most importantly, governments must invest in the solutions that Aboriginal women have already identified: solutions that are culturally strong, evidence-based and proven to work.



The safety of Aboriginal women and children must remain the central objective of the Second Action Plan and all related reforms.

Thank you for the opportunity to contribute to this consultation process to inform the development of the Second Action Plan. Should you have any questions or wish to discuss the matter raised above further, please do not hesitate to our office at officeofthceo@djirra.org.au.

Yours sincerely,



September 2026