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Consultation on the Second Action Plan
(*National Plan to End Violence against Women and Children 2022–2032*)
Department of Social Services – Australian Government

Via email: Secondactionplan@dss.gov.au

Dear Consultation team

I welcome the opportunity to contribute to the consultation on the *Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032*.

As Queensland's Child and Family Commissioner I provide oversight of the state's child protection system and I am the chair of the Queensland Child Death Review Board, which conducts independent reviews following the deaths of children. I also maintain the Queensland Child Death Register, using research and annual reporting to inform prevention initiatives and strengthen system accountability.

In performing these functions, I build and sustain a distinctive evidence base on the relationship between domestic, family and sexual violence and outcomes for children, including suicide, cumulative harm and gaps in system response. This submission draws on this evidence to speak most directly to Priority Areas 1 and 3 of the consultation (victim-survivors, and children and young people in their own right) where our evidence base offers the clearest and most direct contribution, with a shorter response to the remaining priority areas.

Should you have any questions or wish to discuss this matter further please do not hesitate to contact me directly on [REDACTED] or via email at [REDACTED]

Yours sincerely



Luke Twyford
Principal Commissioner
Queensland Family and Child Commission

31 July 2026

Consultation on the **Second Action Plan**

(National Plan to
End Violence
against Women and
Children 2022-2032)

Principal Commissioner Luke Twyford

Executive Summary

The Queensland Family and Child Commission welcomes the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032. Through its statutory functions, the Commission examines the experiences of children who interact with multiple government systems, identifies recurring systemic issues and provides independent advice to governments to improve outcomes for children and young people.

Domestic, family and sexual violence profoundly shapes the lives of children and young people. While public policy has historically understood this violence primarily through the experiences of adult victim-survivors, the Queensland Family and Child Commission's evidence demonstrates that children experience this violence directly, cumulatively and often across multiple service systems. Children are not simply witnesses to violence - they are victim-survivors in their own right.

This submission draws upon two nationally significant bodies of evidence. The first is five years of independent reviews undertaken by the Queensland Child Death Review Board. These reviews provide unique insight into the lives of children who have experienced the most serious outcomes of cumulative harm and reveal consistent patterns in domestic and family violence, mental ill-health, substance misuse, coercive control, service-system interaction and missed opportunities for intervention.

The second is *In Plain Sight: Review into System Responses to Child Sexual Abuse* - the most comprehensive Australian review of institutional responses to child sexual abuse undertaken since the *Royal Commission into Institutional Responses to Child Sexual Abuse*. The Review examined more than 20,000 pages of evidence, commissioned independent research, received public submissions and consulted extensively with victim-survivors, practitioners and experts. It demonstrated that opportunities to identify and prevent child sexual abuse are frequently missed because safeguarding systems remain fragmented, reactive and focused on individual incidents rather than cumulative risk.

Although these bodies of work examine different forms of violence, they reveal remarkably consistent findings about the experiences of children and the operation of Australian service systems. The Commission therefore approaches this consultation from a child-centred perspective. Rather than considering domestic, family and sexual violence solely as an issue affecting adult relationships, this submission examines how violence shapes children's lives, development, wellbeing and future outcomes. It also considers how Australia's prevention, protection and recovery systems can better recognise children as victim-survivors in their own right. Across both bodies of work, five themes emerge.

- 1. Children experience violence as victim-survivors in their own right:** The Commission's evidence consistently demonstrates that children experience domestic, family and sexual violence as direct victims rather than observers. Exposure to violence affects children's physical safety, emotional wellbeing, attachment, development, educational engagement and lifelong health. Across five years of child death reviews, domestic and family violence has remained one of the most significant features of the children's lives, frequently occurring alongside parental mental ill-health, substance misuse, housing instability and chronic involvement with statutory systems. Despite this, policy, legislation, administrative data and service delivery continue to be organised primarily around adults. Children's own experiences, fears, trauma and recovery remain insufficiently recognised.
- 2. Violence is cumulative rather than episodic:** The Commission's evidence demonstrates that violence rarely exists in isolation. Children exposed to domestic and family violence commonly experience multiple, interacting adversities that accumulate throughout childhood. Coercive control, psychological abuse, parental mental illness, substance misuse, poverty, housing instability and repeated contact with government services combine to create environments characterised by chronic fear, instability and cumulative harm. This understanding has significant implications for prevention. Systems designed to respond to discrete incidents frequently fail to recognise the pattern of cumulative risk shaping children's lives.
- 3. Earlier intervention is possible:** The evidence demonstrates that opportunities to intervene occur throughout childhood. Pregnancy, infancy, early childhood and adolescence each provide distinct opportunities to strengthen parenting, support victim-survivors, engage fathers, interrupt coercive control and prevent the escalation of violence. Similarly, *In Plain Sight* found that child sexual abuse is rarely characterised by a single missed opportunity. Rather, organisations frequently observe concerning behaviours over extended periods but lack the systems, confidence or authority to connect information and respond decisively. Earlier intervention therefore requires services that recognise emerging patterns of harm rather than waiting until statutory or criminal thresholds have been reached.
- 4. Integrated systems protect children:** Across both review types, fragmentation consistently emerged as one of the greatest barriers to protecting children. Information remained dispersed across child protection, policing,

health, education, justice, housing and other regulatory agencies. Workforce pressures reduced opportunities for effective assessment. Children moved between systems that frequently addressed individual risks but rarely developed a shared understanding of the child's overall circumstances. The Commission's evidence suggests that stronger information sharing, integrated governance, consistent risk assessment and improved workforce capability represent some of the greatest opportunities for reform.

5. **First Nations children require culturally led responses:** The Commission's evidence also demonstrates the disproportionate impact of violence on Aboriginal and Torres Strait Islander children and families. Improving outcomes requires more than ensuring First Nations people are included within mainstream responses. It requires culturally safe assessment, genuine partnership with Aboriginal and Torres Strait Islander organisations and explicit alignment with *Our Ways – Strong Ways – Our Voices* and Closing the Gap reforms.

Drawing on this evidence, the Commission supports the continued evolution of the National Plan and recommends that the Second Action Plan strengthen its focus on children through five connected priorities. The Commission submits that the Second Action Plan should:

1. recognise children affected by domestic, family and sexual violence as victim-survivors in their own right;
2. adopt a life-course approach to prevention that recognises opportunities for intervention before violence becomes entrenched;
3. strengthen child-centred therapeutic responses and ensure children are consistently identified, counted and heard;
4. improve responses to adolescents and others using violence through developmentally appropriate interventions that recognise the relationship between victimisation and offending; and
5. strengthen national integration between child protection, health, education, justice, policing and safeguarding systems to improve early identification and coordinated responses.

Collectively, these reforms would strengthen Australia's ability not only to respond to violence after it occurs, but to identify risk earlier, prevent cumulative harm and improve outcomes for children throughout their lives.

To aid you in your work this submission follows the consultation priorities established for the Second Action Plan. Within each priority, however, the Commission focuses on the evidence emerging from child death reviews and *In Plain Sight*, identifying recurring systemic issues and opportunities for national reform.

Regards



Luke Twyford
Queensland Family and Child Commissioner
Chair of Queensland's Child Death Review Board

Priority Area 1: Victim-survivors

Children are victim-survivors in their own right

The Commission's evidence consistently demonstrates that children experience domestic, family and sexual violence as direct victim-survivors rather than passive witnesses to violence occurring between adults. Violence shapes children's safety, development, relationships, health and wellbeing throughout childhood and frequently across their entire life course. Yet despite growing recognition of children's experiences, policy frameworks, administrative data and service systems continue to respond primarily through the lens of the adults.

This distinction is not simply semantic. It determines whether children are identified, counted, assessed and provided with therapeutic support in their own right. It influences how practitioners understand parenting capacity, how risk is assessed, and whether children's own experiences of fear, coercion and trauma become visible within service systems.

Despite experiencing significant harm, children remain inconsistently recognised across Australia's domestic and family violence systems. Administrative data frequently records violence primarily in relation to adult victim-survivors. Police responses often focus upon immediate criminal offences rather than children's broader experiences of fear and trauma. Service systems continue to organise therapeutic responses principally around adults, leaving many children without developmentally appropriate support. This invisibility affects more than data collection. It shapes service design, funding priorities, workforce capability and national policy. If children are not consistently recognised as victim-survivors, they cannot consistently receive responses designed around their needs. Recognising children as victim-survivors therefore represents one of the most important opportunities available to the Second Action Plan.

For too long our government service systems have been focussed on transactional interactions with individuals, rather than holistic service responses to family-groups.

Across five years of independent child death reviews, the Queensland Child Death Review Board has consistently identified domestic and family violence as one of the most significant factors affecting children's lives. Violence was rarely an isolated feature of the cases reviewed. Instead, it formed part of a broader pattern of cumulative adversity involving parental mental ill-health, alcohol and other drug misuse, housing instability, social disadvantage and repeated interaction with government and non-government services. The Board's evidence demonstrates that understanding children's experiences requires moving beyond individual incidents towards recognising the cumulative environments in which children live. This understanding aligns closely with the Australian Child Maltreatment Study, which found that exposure to domestic and family violence is the most prevalent form of child maltreatment reported by Australians. Nearly forty per cent of Australians reported exposure to domestic and family violence during childhood, increasing to almost forty-four per cent among young adults aged between sixteen and twenty-four years.

These findings reinforce that exposure to violence is not a peripheral issue affecting a small number of children. It is one of the defining experiences of childhood adversity in Australia.

The Commission's evidence demonstrates that violence is cumulative

The Board's evidence consistently demonstrates that children rarely experience domestic and family violence in isolation. During 2025–26, domestic and family violence was identified in sixty of the eighty-three cases reviewed, representing seventy-two per cent of all matters considered by the Board. Across five years, this pattern has remained remarkably consistent despite substantial reform activity across Queensland.

Importantly, domestic and family violence almost never appeared alone. Children exposed to violence frequently also experienced parental mental ill-health, substance misuse, housing instability, social isolation, economic disadvantage and prolonged statutory involvement. Rather than presenting as independent risk factors, these adversities interacted throughout children's lives, creating environments characterised by instability, chronic stress and cumulative trauma.

The Board's thematic review *Overestimating Parents' Ability in Light of Their Willingness* illustrates this complexity. Across the twelve families reviewed, domestic and family violence was present in eighty-three per cent of cases. Mental ill-health affected more than half of families, while parental substance misuse was similarly prevalent. Significantly, more than four in five families experienced two or more of these major adversities simultaneously. These findings reinforce an important message for policy makers. Violence should not be understood as an isolated event requiring an isolated response. It is often one element within an interconnected system of disadvantage requiring coordinated assessment and intervention.

Violence affects children's lives beyond physical harm

The Board's work over the past five years has increasingly demonstrated that children's experiences of domestic and family violence extend well beyond direct physical assault. Children experienced ongoing fear, emotional distress, disrupted attachment, developmental impacts, educational disengagement and chronic exposure to coercive and controlling environments. In many cases, violence fundamentally shaped the conditions of children's everyday lives. Recognising this, the Board's 2025–26 thematic review *Recognising Abuse Beyond Physical Acts of Domestic and Family Violence* examined how systems identify and respond to non-physical forms of abuse. The review found that coercive control, intimidation, isolation, surveillance, emotional abuse and domination frequently created environments of persistent fear and instability for children. Yet these dynamics often remained poorly recognised because assessment frameworks continued to prioritise discrete incidents of physical violence over patterns of controlling behaviour.

Children do not experience coercive control indirectly. They experience it through disrupted relationships, diminished parenting capacity, social isolation, uncertainty, fear and cumulative emotional harm. Understanding children's lived experience therefore requires systems capable of recognising patterns of behaviour rather than isolated incidents. This shift represents one of the most significant developments emerging from the Board's work over the past five years.

Parenting capacity cannot be understood separately from violence

The Commission's evidence also demonstrates that domestic and family violence profoundly affects parenting capacity. Child protection systems have traditionally placed considerable emphasis on parental willingness to engage with services. While willingness remains important, the Board's evidence demonstrates that willingness alone cannot be assumed to reflect a parent's ability to provide safe and consistent care where domestic and family violence is present. Violence affects parenting through multiple pathways. Parents experiencing coercive control often have diminished emotional, psychological and financial capacity to respond consistently to children's needs. Ongoing fear, trauma, injury, housing insecurity, economic abuse and legal manipulation reduce the practical capacity to maintain protective parenting, even where commitment to children's wellbeing remains strong.

This understanding is strongly supported by Australian and international research demonstrating that domestic and family violence affects parental wellbeing, confidence, emotional regulation and responsiveness to children's developmental needs. Longitudinal Australian studies similarly demonstrate that persistent exposure to domestic and family violence contributes to increased parental stress, inconsistent parenting and poorer outcomes for children. The Board's evidence therefore reinforces the importance of assessing parenting capacity functionally rather than relying primarily upon parental intention or engagement with services. This distinction has become increasingly important across successive child death reviews.

Coercive control remains under-recognised

Across both child death reviews and broader domestic and family violence research, coercive control has emerged as one of the most significant yet least consistently recognised indicators of escalating risk. Coercive control is characterised by patterns of intimidation, domination, surveillance, isolation and psychological abuse that progressively restrict the autonomy and safety of victim-survivors. Although physical violence may occur within these relationships, coercive control frequently provides the underlying framework through which violence is exercised.

The Board's evidence demonstrates that children experience these patterns directly. Children live within environments characterised by fear, unpredictability and constant monitoring. Their relationships with protective parents are undermined, their opportunities for social connection diminish and their emotional wellbeing progressively deteriorates. Importantly, coercive control also contributes to one of the most significant systemic risks identified by the Commission - the misidentification of victim-survivors as perpetrators. Evidence from Queensland's Domestic and Family Violence Death Review and Advisory Board demonstrates that Aboriginal and Torres Strait Islander women are disproportionately identified as respondents to protection orders despite later being recognised as victim-survivors of serious violence. Such misidentification has profound implications for child protection responses, parenting assessments and the unnecessary removal of children. Recognising coercive control therefore improves not only responses to adult victim-survivors, but also children's safety and wellbeing.

First Nations considerations

The Commission's evidence demonstrates that Aboriginal and Torres Strait Islander children experience the impacts of domestic and family violence within broader contexts of intergenerational trauma, colonisation, socioeconomic disadvantage and systemic inequity. The Board's reviews consistently demonstrate the importance of culturally safe assessment, genuine partnership with Aboriginal and Torres Strait Islander organisations and greater recognition of the impact that coercive control and misidentification have on First Nations families.

Improving outcomes for First Nations children will require stronger alignment between the Second Action Plan, *Our Ways – Strong Ways – Our Voices* and Closing the Gap reforms.

Implications for the Second Action Plan

Improving outcomes for children requires a fundamental shift in how domestic, family and sexual violence is understood across Australian systems. The Second Action Plan should:

- explicitly recognise children as victim-survivors in their own right across policy, legislation, data collections and service design;
- strengthen child-centred assessment frameworks that recognise cumulative harm rather than discrete incidents of violence;
- embed recognition of coercive control and non-physical abuse within risk assessment, workforce capability and service responses;
- strengthen parenting assessments by recognising the functional impacts of violence on caregiving capacity;
- improve the visibility of children within policing, health, justice and child protection datasets; and
- ensure culturally safe responses that reduce the misidentification of Aboriginal and Torres Strait Islander victim-survivors and strengthen outcomes for First Nations children.

Only by recognising children as direct victim-survivors can Australia develop systems capable of preventing cumulative harm, improving recovery and breaking intergenerational cycles of violence.

Priority Area 2: Prevention and Early Intervention

Prevention begins long before violence becomes visible

The Commission strongly supports the Second Action Plan's continued emphasis on prevention and early intervention, however, the Commission's evidence demonstrates that preventing domestic, family and sexual violence requires a broader understanding of when prevention begins and how opportunities for intervention emerge throughout childhood.

Across five years of child death reviews and the *In Plain Sight* Review, the Commission has consistently found that serious harm rarely occurs without warning. Instead, violence develops over time through the interaction of individual, family, organisational and systemic factors. Opportunities to recognise escalating risk frequently exist months or years before children experience serious harm.

Prevention should not be viewed solely as community awareness campaigns or primary prevention initiatives delivered before violence occurs. Prevention must also encompass the capacity of services to recognise cumulative risk, intervene earlier, strengthen protective relationships and respond proportionately as children's circumstances change.

[The Commission's evidence demonstrates that prevention is a continuous process. This has important implications for national policy.](#)

Opportunities for prevention emerge across the life course

The Commission's evidence demonstrates that children's vulnerability to domestic, family and sexual violence changes throughout development. Consequently, prevention strategies must recognise the distinct opportunities available at different stages of childhood rather than adopting a single, uniform approach. Pregnancy and the first years of life represent particularly significant opportunities for intervention. Domestic and family violence frequently commences or escalates during pregnancy, while parental mental ill-health, substance misuse, housing instability and social isolation often emerge or intensify during this period. These circumstances not only increase immediate risks for women but also shape children's early attachment, development and long-term wellbeing.

The Child Death Review Board has repeatedly observed that many families who later experienced catastrophic outcomes had extensive contact with universal health, maternity, primary care and community services during pregnancy and infancy. These interactions presented important opportunities to identify cumulative risk, support parenting capacity and strengthen family functioning before concerns escalated.



As children enter early childhood and school, educators, health professionals and community organisations become increasingly important protective factors. Schools and early childhood education services are often among the first settings to observe changes in behaviour, attendance, emotional regulation or family functioning. They are therefore uniquely positioned to identify emerging concerns and facilitate earlier access to support.

Adolescence presents another critical opportunity for prevention. The Commission's evidence demonstrates that adolescence is a period during which the impacts of childhood adversity may become increasingly visible through deteriorating mental health, disengagement from education, family conflict, homelessness, harmful sexual behaviours, dating violence or contact with youth justice systems. These behaviours should not be viewed solely as presenting problems requiring enforcement responses. They may also represent indicators of cumulative trauma and unmet developmental need.

[A life-course approach therefore recognises that prevention opportunities do not diminish as children grow older. Rather, they evolve and require different responses at different stages of development.](#)

Prevention requires recognising cumulative risk

Across both child death reviews and *In Plain Sight*, one finding consistently emerges: systems are considerably more effective at responding to individual incidents than recognising cumulative patterns of harm. Children rarely experience a single event that clearly signals serious future violence. Instead, risk develops through the accumulation of multiple concerns observed by different organisations over extended periods.

In child death reviews, information relating to domestic and family violence, parental mental ill-health, substance misuse, educational disengagement, criminal justice involvement and child protection history frequently existed across multiple agencies. While individual organisations often responded appropriately to the information available to them, no agency consistently developed a comprehensive understanding of the child's overall circumstances. Similarly, *In Plain Sight* found that institutional child sexual abuse was frequently preceded by multiple low-level indicators that, when considered individually, appeared insufficient to warrant significant intervention. Organisations often observed concerning behaviours, boundary violations or repeated complaints but assessed each event in isolation rather than recognising an emerging pattern of escalating risk.

The Commission concluded that safeguarding systems should move beyond responding to isolated incidents and instead develop capabilities that enable the identification of cumulative risk over time. This finding has broader relevance beyond institutional child sexual abuse. Domestic, family and sexual violence similarly develops through patterns of behaviour that become apparent only when information is considered collectively.

Early intervention depends upon integrated service responses

The Commission's evidence demonstrates that opportunities for prevention are frequently lost because services continue to operate within organisational rather than child-centred frameworks. Children experiencing domestic and family violence commonly interact with multiple systems simultaneously, including health services, schools, early childhood education, child protection, policing, housing, specialist domestic and family violence services and community organisations. Each service contributes valuable information about the child's circumstances, yet these insights are rarely integrated into a shared understanding of cumulative risk. [As a result, no individual service may appreciate the extent of adversity affecting the child or recognise that concerns observed across multiple settings collectively indicate escalating danger.](#)

The Child Death Review Board has consistently identified fragmented assessment and limited coordination between agencies as recurring features of children's lives. These findings reinforce the importance of integrated service delivery models that facilitate shared assessment, coordinated planning and timely information exchange. Strengthening collaboration between universal, targeted and statutory services represents one of the most significant opportunities to improve prevention.

Prevention requires stronger organisational safeguarding

The Commission's *In Plain Sight* Review also demonstrates that prevention extends beyond family violence responses. Organisations that work with children occupy a critical position within Australia's prevention system. Schools, sporting organisations, faith-based organisations, residential services, health providers, disability services and early childhood education providers all have opportunities to identify emerging risks before children experience significant harm. The Review found that safeguarding failures rarely resulted from a single poor decision. Instead, they reflected organisational cultures that normalised boundary violations, inconsistent reporting practices, inadequate workforce capability and fragmented governance arrangements.

[Preventing child sexual abuse therefore requires organisations to move beyond compliance with minimum standards towards actively identifying, assessing and responding to emerging safeguarding risks.](#)



This organisational approach to prevention complements broader domestic and family violence reforms by strengthening children's safety across all environments in which they live, learn and participate.

Prevention requires supporting protective relationships

While much prevention policy understandably focuses on reducing risk, the Commission's evidence demonstrates that strengthening protective relationships is equally important. Children consistently identified safe, stable and trusted relationships as central to their wellbeing. Across child death reviews, children who maintained strong relationships with non-offending parents, extended family, teachers, health professionals or other trusted adults were often better positioned to disclose concerns, access support and maintain resilience despite experiencing significant adversity. Similarly, *In Plain Sight* emphasised the importance of organisational cultures that encourage children to speak up, adults to act upon concerns and leaders to respond transparently.

[These findings reinforce that prevention is not achieved solely by reducing exposure to violence. It also depends upon strengthening the relationships, communities and organisations that help children remain safe.](#)

First Nations considerations

The Commission's evidence demonstrates that prevention strategies affecting Aboriginal and Torres Strait Islander children must be developed and delivered in partnership with First Nations communities. Aboriginal and Torres Strait Islander Community Controlled Organisations possess critical cultural knowledge, community relationships and expertise that strengthen prevention efforts. Supporting these organisations to lead culturally safe, place-based prevention initiatives is essential to achieving sustainable improvements in outcomes for First Nations children and families. The Second Action Plan should continue to strengthen alignment with *Our Ways – Strong Ways – Our Voices* and Closing the Gap reforms while recognising the central role of Aboriginal and Torres Strait Islander leadership in preventing violence.

Implications for the Second Action Plan

The Commission's evidence demonstrates that effective prevention requires systems capable of recognising cumulative harm and responding before violence becomes entrenched. The Second Action Plan should therefore:

- adopt a life-course approach that recognises distinct opportunities for prevention from pregnancy through adolescence;
- strengthen universal services as key partners in identifying and responding to cumulative risk;
- improve information sharing and multidisciplinary assessment to support earlier intervention;
- embed cumulative harm and coercive control within prevention and risk assessment frameworks;
- strengthen organisational safeguarding across institutions working with children; and
- invest in culturally led prevention initiatives designed and delivered in partnership with Aboriginal and Torres Strait Islander organisations.

[Prevention is most effective when systems respond not only to incidents of violence, but also to the patterns of adversity that precede them.](#)

The Commission's evidence demonstrates that these patterns are frequently visible long before serious harm occurs. The challenge for the Second Action Plan is to ensure Australia's systems are equipped to recognise them, connect them and act upon them before children's lives are permanently affected.

Priority Area 3: Children and Young People

Children must be recognised as victim-survivors in their own right

The Commission welcomes the inclusion of a dedicated priority focused on children and young people within the Second Action Plan. This reflects an important shift in recognising that children experience domestic, family and sexual violence differently from adults and require responses specifically designed around their developmental needs, rights and lived experiences. However, the Commission's evidence demonstrates that Australia has not yet fully translated this recognition into policy or practice.

Across child death reviews, *In Plain Sight*, consultations with children and young people, and the Commission's broader oversight work, one finding has remained remarkably consistent: [children continue to be viewed primarily through the experiences of adults rather than as individuals experiencing violence in their own right](#).

Children's experiences remain largely invisible

Recognising children as victim-survivors therefore requires more than acknowledging that children are affected by violence. It requires redesigning systems so that children's experiences become consistently visible. The Commission's evidence demonstrates that children frequently disappear within responses that appropriately focus on adult victim-survivors. Police responses often concentrate on offences committed against adults. Domestic and family violence services understandably prioritise immediate safety for women experiencing violence. Child protection services focus upon parenting capacity and statutory thresholds. Health services respond to presenting clinical needs. Each of these responses performs an important function. Collectively, however, they can result in children's own experiences becoming secondary to adult assessments.

Children who have witnessed repeated violence, experienced coercive control, lived within environments characterised by fear or assumed inappropriate caring responsibilities may receive limited direct assessment of their own trauma, recovery needs or long-term wellbeing. The Commission's evidence demonstrates that this invisibility affects both immediate safety and lifelong outcomes. Violence experienced during childhood influences neurological development, educational participation, emotional regulation, relationships, mental health and physical wellbeing across adulthood. Yet many systems continue to respond primarily to the incident rather than the child.

[Improving visibility must therefore become a central objective of the Second Action Plan.](#)

Children have the right to be heard

The Commission's work consistently demonstrates that children possess valuable insight into the services and systems intended to protect them. Through the Child Death Review Board, the *In Plain Sight* Review, youth summits, consultations and ongoing engagement with children and young people, the Commission has heard remarkably consistent messages about what children need from adults and institutions.

Children want adults to believe them. They want services that communicate honestly, explain decisions clearly and involve them in matters affecting their lives. They want safe adults who remain involved over time rather than relationships that end when individual services conclude. They want systems that understand the complexity of their lives rather than reducing them to single incidents or presenting problems.

[Perhaps most importantly, children consistently demonstrate sophisticated understanding of safety, trust and risk. They are often able to identify behaviours that make them feel unsafe long before adults recognise them as significant.](#)

The Commission's *In Plain Sight* Review highlighted the importance of organisations creating cultures in which children feel confident to raise concerns and trust that adults will respond appropriately. Equally, the Commission's Youth Summit participants repeatedly emphasised that meaningful participation depends upon adults genuinely acting upon what children say rather than merely consulting them. [Listening to children is therefore not simply a participation exercise. It is a safeguarding strategy.](#)

Recovery requires child-centred therapeutic responses

The Commission's evidence demonstrates that recognising children as victim-survivors must be accompanied by access to developmentally appropriate therapeutic support. Children experience violence differently depending upon their age, developmental stage, cultural identity, disability, family circumstances and previous experiences of trauma. Responses designed primarily for adults cannot simply be adapted for children. Instead, services must understand childhood development, attachment, trauma, communication and recovery throughout the life course. The Commission's evidence suggests that many children continue to experience significant barriers accessing specialist therapeutic services following domestic, family and sexual violence.

Delays in accessing support, workforce shortages, service eligibility criteria and inconsistent availability across jurisdictions all affect children's opportunities for recovery. Importantly, recovery should not be viewed solely as addressing trauma following violence. Recovery also involves rebuilding children's sense of safety, strengthening protective relationships, supporting educational participation, improving emotional wellbeing and restoring opportunities for healthy childhood development. These outcomes require sustained investment rather than short-term crisis responses.

Digital environments are increasingly shaping children's experiences

The Commission's broader safeguarding work also demonstrates that children's experiences of violence increasingly extend into digital environments. [Technology enables new forms of coercive control, image-based abuse, grooming, surveillance and peer-to-peer harm.](#)

[Young people themselves consistently describe online and offline experiences as interconnected rather than separate aspects of their lives.](#)

Consequently, prevention, education and recovery responses should similarly recognise children's digital experiences as integral to contemporary safeguarding. While domestic, family and sexual violence systems have traditionally focused upon physical environments, the Second Action Plan should continue strengthening responses that recognise technology-facilitated abuse affecting children and young people.

Implications for the Second Action Plan

The Commission's evidence demonstrates that children cannot remain secondary participants within systems responding to domestic, family and sexual violence. The Second Action Plan should therefore:

- explicitly recognise children as victim-survivors in their own right across all policy, legislation and service frameworks;
- strengthen national approaches to identifying, recording and measuring children's experiences of violence;
- expand access to developmentally appropriate therapeutic services designed specifically for children and young people;
- embed children's participation rights across service design, policy development and individual decision-making;
- strengthen responses to technology-facilitated abuse affecting children and young people.

Children consistently tell us that safety is built through trusted relationships, adults who listen, and systems that respond when concerns are raised. The Commission's evidence reinforces that these experiences are not simply desirable features of good practice—they are fundamental components of effective prevention, recovery and long-term wellbeing. A child-centred approach to the Second Action Plan should therefore ensure that children are not merely acknowledged within Australia's response to domestic, family and sexual violence, but are recognised, heard and supported as victim-survivors in their own right.

Priority Area 4: Preventing the Use of Violence

Violence is not inevitable

The Commission supports greater investment in responses for people who use violence, however, the Commission's evidence suggests that the greatest opportunity for reducing future domestic, family and sexual violence lies in intervening much earlier - before patterns of violence become entrenched. Across five years of child death reviews and the *In Plain Sight* Review, the Commission has consistently observed that harmful behaviours rarely emerge suddenly or in isolation. Instead, they develop through the interaction of childhood adversity, trauma, exposure to violence, disrupted attachment, unmet developmental needs and environmental influences over many years.

[This evidence challenges traditional approaches that focus primarily on responding once violence has occurred.](#)

The Commission considers that Australia should place greater emphasis on preventing the development of violent behaviours throughout childhood and adolescence rather than concentrating predominantly on interventions after offending has occurred. Preventing violence requires understanding how violence develops.

Children's experiences shape future behaviour

The Commission's evidence consistently demonstrates that many children who experience serious adversity are exposed to repeated violence throughout childhood. Domestic and family violence, child abuse and neglect, parental mental ill-health, problematic alcohol and other drug use, housing instability and chronic disadvantage frequently occur together. These experiences affect children's emotional regulation, attachment, social development and capacity to establish healthy relationships.

This should not be interpreted as suggesting that children who experience violence inevitably become people who use violence. Most do not. However, the evidence demonstrates that repeated exposure to violence increases vulnerability and reinforces the importance of early intervention that strengthens protective relationships, promotes

emotional wellbeing and interrupts harmful developmental trajectories. The Child Death Review Board has consistently found that children's lives are characterised by cumulative adversity rather than isolated events. Responding effectively therefore requires understanding violence within the broader context of children's development rather than viewing individual behaviours in isolation.

[This developmental perspective should underpin national prevention efforts.](#)

Adolescence is a critical opportunity for intervention

The Commission considers adolescence to be one of Australia's most significant yet underutilised opportunities for preventing future violence. Adolescence is a period of rapid neurological, emotional and social development during which behavioural patterns remain highly responsive to intervention. It is also a period when the impacts of childhood adversity may become increasingly visible through family conflict, school disengagement, harmful sexual behaviours, substance misuse, homelessness, dating violence or involvement with youth justice systems.

These behaviours should not automatically be understood as evidence of entrenched criminality. Rather, they may represent indicators of cumulative trauma, unmet developmental need and escalating risk. The Commission's broader oversight work has consistently demonstrated that punitive responses rarely address the underlying factors contributing to persistent offending among children and young people. Sustainable reductions in violence require responses that combine accountability with therapeutic intervention, family support, education and opportunities for positive social connection.

[Early intervention during adolescence therefore represents an important violence prevention strategy.](#)

Young people who use violence require developmentally appropriate responses

Children and young people who use violence differ fundamentally from adults. Their behaviour occurs within the context of ongoing neurological development, dependence upon caregivers and continuing social, emotional and cognitive maturation. Consequently, responses designed for adult perpetrators cannot simply be applied to adolescents. The Commission supports approaches that recognise both accountability and rehabilitation.

Young people who use violence should be held accountable for their behaviour while simultaneously receiving interventions that address trauma, emotional regulation, relationship skills, education, cultural identity and family functioning. Programs should also recognise the diversity of pathways leading to violence. Some young people have experienced significant victimisation themselves. Others may have been exposed to coercive control, family violence, criminal exploitation or harmful peer influences. Effective intervention therefore requires comprehensive assessment that identifies individual strengths, risks and protective factors rather than assuming a single pathway to violence. A developmentally informed approach provides the greatest opportunity to interrupt future offending and reduce lifelong involvement in violence.

Harmful sexual behaviours require earlier recognition

The Commission's *In Plain Sight* Review highlighted the importance of recognising concerning sexual behaviours at their earliest stages. The Review found that many adults who later committed child sexual abuse had displayed boundary violations, inappropriate conduct or other concerning behaviours long before serious offending became apparent. These behaviours were often individually recognised but collectively underestimated. Importantly, the Commission also recognises that harmful sexual behaviours displayed by children and young people require careful, developmentally informed responses and not all harmful sexual behaviour indicates future offending.

Many children displaying such behaviours have themselves experienced abuse, trauma or inappropriate sexual exposure. Responses should therefore prioritise comprehensive assessment, therapeutic intervention and family support while maintaining the safety of other children. Strengthening workforce capability to recognise, assess and respond appropriately to harmful sexual behaviours represents an important opportunity for prevention.

Men and fathers remain central to prevention

The Commission's evidence also reinforces the importance of engaging men and fathers within violence prevention strategies. Across child death reviews, fathers and father figures frequently played significant roles in children's lives, whether as protective adults, perpetrators of violence or individuals experiencing their own vulnerabilities.

[Historically, many family service systems have focused primarily upon mothers, with fathers participating less consistently in assessment, intervention and parenting support.](#)

The Commission considers that prevention efforts should strengthen opportunities to engage fathers positively throughout children's lives. Supporting healthy father-child relationships, promoting respectful relationships, strengthening parenting capability and encouraging help-seeking among men represent important components of

long-term violence prevention. Where violence is present, interventions should prioritise children's safety while supporting behavioural change that reduces future risk.

Organisational responses must identify emerging behaviour

The Commission's *In Plain Sight* Review demonstrated that organisations working with children often observe concerning behaviours before serious harm occurs. Schools, sporting organisations, residential services, disability providers, early childhood services and community organisations are uniquely positioned to identify early warning signs through their ongoing relationships with children and young people, however, opportunities for intervention are frequently lost because organisations lack confidence, capability or governance arrangements supporting proportionate responses to emerging concerns.

Preventing future violence therefore requires organisations to move beyond responding solely to reportable incidents. They should also develop the capability to recognise patterns of concerning behaviour, share information appropriately and intervene before behaviours escalate. This represents one of the strongest lessons emerging from the Commission's safeguarding work.

Implications for the Second Action Plan

The Commission's evidence demonstrates that reducing future domestic, family and sexual violence requires earlier intervention with children and young people before harmful behaviours become established. The Second Action Plan should therefore:

- adopt a developmental approach that recognises violence as a preventable trajectory rather than an inevitable outcome;
- strengthen early intervention for adolescents displaying indicators of escalating risk;
- expand developmentally appropriate responses for children and young people who use violence, combining accountability with therapeutic support;
- improve national capability to recognise and respond to harmful sexual behaviours in childhood and adolescence;
- strengthen positive engagement with fathers and male caregivers throughout children's lives; and
- support organisations working with children to identify and respond to emerging patterns of concerning behaviour before serious harm occurs.

The Commission's evidence demonstrates that children are not born to use violence. Violence develops through experiences, relationships and environments that can be influenced throughout childhood. Australia's greatest opportunity to reduce future domestic, family and sexual violence therefore lies not only in responding to those who already use violence, but in intervening early enough that fewer children follow that path at all.

Priority Area 5: Building an Integrated System

Children experience one life. Systems experience many parts.

The Commission strongly supports the Second Action Plan's focus on strengthening integration across Australia's domestic, family and sexual violence system. However, the Commission's evidence demonstrates that integration should not simply be understood as improved collaboration between agencies. Rather, integration should be measured by whether children experience coordinated, timely and informed responses regardless of how many organisations become involved in their lives.

*Across five years of child death reviews and the *In Plain Sight* Review, the Commission has consistently found that children experiencing serious harm are rarely unknown to government or community services. Instead, they are often well known.*

Health services may understand the family's medical history. Schools may recognise deteriorating attendance or behavioural change. Police may respond repeatedly to domestic and family violence incidents. Child protection may have extensive historical involvement. Community organisations may provide ongoing family support. Specialist domestic and family violence services may be working with the non-offending parent. Each organisation often responds appropriately within its own legislative responsibilities and operational frameworks. Yet the Commission's evidence demonstrates that no single organisation consistently develops a complete understanding of the child's circumstances.

Children therefore experience fragmented systems despite extensive professional involvement. The challenge for the Second Action Plan is not simply to encourage greater collaboration. It is to ensure that systems collectively recognise the child's lived experience rather than isolated organisational responsibilities.

Fragmentation remains one of the greatest risks to children's safety

Fragmentation is one of the most consistent findings emerging from the Commission's oversight work. Across child death reviews, opportunities to prevent serious harm were frequently dispersed across multiple organisations.

Individual agencies often held information indicating increasing concern, yet no organisation possessed the complete picture necessary to appreciate the cumulative level of risk. Similarly, *In Plain Sight* demonstrated that organisations responding to child sexual abuse frequently assessed concerns individually rather than collectively. Behaviour that appeared relatively minor in isolation often became highly significant when viewed alongside previous reports, workforce information or concerns held elsewhere within the organisation.

The Commission concluded that safeguarding systems remain considerably better at responding to individual events than recognising emerging patterns of cumulative harm. This finding has direct relevance for domestic, family and sexual violence. Children experience cumulative lives. Systems continue to respond to cumulative information through episodic processes. Reducing this gap represents one of Australia's greatest opportunities to improve prevention.

Information sharing is necessary but not sufficient

The Commission supports continued reform to improve lawful and timely information sharing across agencies. The Commission's evidence demonstrates that information sharing alone does not produce better decisions. Across many child death reviews, relevant information was technically available but remained dispersed across agencies, recorded inconsistently or interpreted differently depending upon organisational priorities.

The challenge therefore extends beyond exchanging information. It requires systems capable of analysing, interpreting and acting upon information collectively. The Commission considers that Australia's next phase of reform should focus upon developing shared understanding rather than simply increasing the movement of information between organisations. Integrated assessment, multidisciplinary decision-making and shared risk frameworks are likely to produce greater improvements than information exchange alone.

Workforce capability underpins integration

Integrated systems depend upon capable workforces. The Commission's oversight work consistently demonstrates that practitioners across health, education, policing, child protection, early childhood education, justice and community services possess substantial expertise within their respective disciplines. However, responding effectively to domestic, family and sexual violence increasingly requires confidence operating across organisational boundaries.

Professionals must understand cumulative harm, coercive control, child development, trauma, cultural safety and information sharing while recognising the complementary roles performed by other services.

The Child Death Review Board has also repeatedly observed the impacts of workforce instability, high caseloads and recruitment challenges on the consistency and quality of service delivery. Supporting workforce capability should therefore extend beyond increasing workforce numbers. It should also strengthen multidisciplinary learning, shared professional development, leadership capability and opportunities for reflective practice across sectors. An integrated system ultimately depends upon an integrated workforce.

Australia should strengthen intelligence-led approaches to safeguarding

One of the strongest findings emerging from *In Plain Sight* was the need to strengthen Australia's capability to identify patterns of emerging risk before children experience serious harm. The Review found that institutions frequently possessed sufficient information to recognise escalating safeguarding concerns but lacked systems capable of connecting information over time, identifying recurring behaviours and supporting proactive intervention.

The Commission therefore recommended the establishment of a Child Safeguarding Intelligence Hub capable of identifying emerging risks, analysing patterns across sectors and supporting earlier intervention before criminal thresholds had been reached. Although developed within the context of institutional child sexual abuse, the underlying principle has broader relevance across domestic, family and sexual violence.

Australia has invested significantly in information collection. The next opportunity lies in transforming information into actionable intelligence. An intelligence-led approach does not replace frontline professional judgement. Rather, it strengthens decision-making by enabling practitioners and leaders to recognise cumulative patterns that

individual organisations may be unable to observe independently. The Commission considers that developing stronger national analytical capability represents an important opportunity for the Second Action Plan.

Data should support prevention rather than reporting alone

The Commission also encourages greater investment in national data capability. Australia has made significant progress improving data relating to domestic, family and sexual violence, however, many datasets continue to describe what has already occurred rather than identifying where future harm may emerge. The Commission considers that future investment should support linked data, predictive system learning, longitudinal analysis and earlier identification of cumulative vulnerability. Better data should improve decision-making rather than simply reporting.

Children benefit when data becomes a tool for prevention rather than retrospective accountability.

Integration must include children

Historically, system integration has often focused upon improving coordination between adult services. The Commission considers that future reforms should explicitly recognise children's experiences. Integrated responses should routinely assess children's wellbeing, seek children's perspectives where appropriate, include child-specific therapeutic planning and ensure children remain visible throughout multidisciplinary decision-making.

Children should not simply accompany adult responses. They should remain central participants within integrated systems.

First Nations considerations

The Commission's evidence demonstrates that integrated responses affecting Aboriginal and Torres Strait Islander children must be designed in genuine partnership with First Nations communities. Aboriginal and Torres Strait Islander Community Controlled Organisations possess unique expertise, trusted relationships and cultural authority that strengthen both prevention and response. Integrated systems should therefore support shared decision-making, culturally informed assessment and genuine transfer of authority wherever appropriate. Alignment with *Closing the Gap* and *Our Ways – Strong Ways – Our Voices* should be viewed as fundamental components of system integration rather than parallel reforms.

Implications for the Second Action Plan

The Commission's evidence demonstrates that Australia already possesses much of the information necessary to prevent serious harm. The challenge is ensuring that information is connected, understood and acted upon before children experience irreversible consequences. The Second Action Plan should therefore:

- strengthen integrated, child-centred responses across health, education, policing, child protection, justice and community services;
- move beyond information sharing towards multidisciplinary assessment and shared understanding of cumulative risk;
- invest in workforce capability that supports collaboration across organisational and professional boundaries;
- strengthen national analytical capability through intelligence-led approaches that identify emerging patterns of harm before serious violence occurs;
- improve linked data and longitudinal analysis to support prevention rather than retrospective reporting; and
- ensure Aboriginal and Torres Strait Islander organisations are genuine partners in integrated governance, decision-making and service delivery.

The Commission's oversight work consistently demonstrates that children experiencing serious harm are rarely invisible to individual services. They become invisible because no single system consistently sees the whole child. The Second Action Plan presents an important opportunity to move beyond coordinated services towards genuinely integrated systems that recognise cumulative harm, connect information and intervene earlier to improve children's safety and wellbeing.

Conclusion

The Queensland Family and Child Commission welcomes the Australian Government's continued commitment to ending domestic, family and sexual violence through the National Plan and the development of the Second Action Plan. The Commission's evidence demonstrates that Australia has made significant progress in recognising the prevalence and impacts of domestic, family and sexual violence. There is growing public awareness, stronger legislative frameworks, increased investment in specialist services and an expanding understanding of the gendered drivers of violence. These reforms have strengthened the national response and provide an important foundation for future action.

The Commission's evidence also demonstrates, however, that children remain insufficiently recognised within many aspects of Australia's response. Across five years of child death reviews and the *In Plain Sight* Review, the Commission has consistently observed that children experience violence differently from adults. They experience its impacts across every aspect of childhood—through disrupted attachment, impaired development, educational disengagement, cumulative trauma, deteriorating mental health and reduced opportunities to participate safely within their communities. Yet systems continue to respond primarily through adult experiences of violence.

Children are too often recognised as witnesses rather than victim-survivors, considered within assessments of parenting rather than through assessment of their own needs, and recorded within administrative systems without their individual experiences becoming fully visible. Recognising children as victim-survivors in their own right represents one of the most significant opportunities available to the Second Action Plan.

The Commission's evidence also demonstrates that violence rarely occurs as isolated incidents. Across child death reviews, domestic and family violence consistently interacted with parental mental ill-health, alcohol and other drug misuse, housing instability, socioeconomic disadvantage, coercive control and longstanding involvement with multiple government systems. Similarly, *In Plain Sight* found that institutional child sexual abuse was frequently preceded by multiple opportunities to identify escalating concerns before serious abuse occurred. These findings reinforce a consistent message:

Children experience cumulative harm. Australian systems continue to respond primarily to individual incidents. Bridging this gap should become a defining objective of the Second Action Plan. Doing so requires more than expanding individual programs. It requires systems capable of recognising patterns of risk, integrating information across organisational boundaries, strengthening professional judgement and intervening earlier in children's lives. It requires universal services, specialist services and statutory agencies to operate as components of a connected safeguarding system rather than separate responses to individual events. Importantly, the Commission's evidence also demonstrates that prevention is possible.

Ultimately, the Commission's evidence points towards a simple but profound conclusion: **Children experience one childhood. They do not experience separate health systems, education systems, child protection systems, justice systems or safeguarding systems. They experience one life.**

The responsibility of governments is therefore not simply to improve individual services, but to ensure those services collectively understand the child's circumstances, recognise cumulative harm and respond in ways that improve safety, recovery and lifelong wellbeing. The Second Action Plan provides an important opportunity to make that shift.

Australia has an opportunity to fundamentally change how it responds to children affected by violence. By recognising children as victim-survivors in their own right, adopting a life-course approach to prevention, strengthening children's participation and recovery, intervening earlier with young people at risk of using violence, and building integrated, intelligence-informed systems, Australia can move beyond responding to violence after it occurs towards preventing harm before it becomes irreversible.

