



Feedback on the Second Action Plan under the National Plan to End Violence against Women and Children 2022– 2032

July 2026

1. Executive Summary

Queensland Indigenous Family Violence Legal Service Aboriginal Corporation (QIFVLS) welcomes the opportunity to provide feedback on the *Second Action Plan* under the *National Plan to End Violence against Women and Children 2022–2032* (National Plan) (Second Action Plan).

The Second Action Plan is a critical opportunity to move beyond commitments and embed the structural reforms necessary to achieve lasting change. Governments have formally committed to self-determination, community control and Closing the Gap. Aboriginal and Torres Strait Islander communities have long identified the solutions needed to improve safety outcomes. The challenge now is political will and implementation. Governments must invest in solutions at the scale required to improve safety outcomes for Aboriginal and Torres Strait Islander women, children, families and communities.

QIFVLS welcomes the release of *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036* (Our Ways) and recognises its role in establishing Aboriginal and Torres Strait Islander-led priorities to end violence. The Second Action Plan should not be implemented in isolation from Our Ways. The two plans should work together to drive coordinated reform and ensure Aboriginal and Torres Strait Islander leadership is embedded across all areas of the National Plan. This requires governments to move beyond consultation and embed Aboriginal and Torres Strait Islander communities as genuine partners in the design, delivery and evaluation of reforms.

The Second Action Plan should align with and advance the Priority Reforms under the *National Agreement on Closing the Gap* (Closing the Gap), including through meaningful partnership with Aboriginal and Torres Strait Islander communities, investment in community-controlled organisations and shared decision-making. Australia will not end family violence for Aboriginal and Torres Strait Islander women and children unless governments invest in Aboriginal and Torres Strait Islander community-controlled organisations, including community-controlled legal services, to lead prevention, early intervention, healing, justice and accountability responses.

Drawing on QIFVLS' experience supporting Aboriginal and Torres Strait Islander victim-survivors across Queensland, this submission identifies practical reforms to strengthen prevention, early intervention, access to justice, healing, and community-led responses.

Ultimately, the success of the Second Action Plan will not be measured by the number of commitments governments make, but by whether more Aboriginal and Torres Strait Islander women, children, families and communities are safer as a result.



ACKNOWLEDGEMENT

QIFVLS acknowledges the Aboriginal and Torres Strait Islander women, children, families and communities who continue to experience and live with the impacts of family violence.

We honour the strength of victim-survivors, the guidance of Elders and the leadership of communities who continue to walk alongside women, children and families supporting healing and creating safer pathways for future generations.



A NOTE ON LANGUAGE

Throughout this submission, QIFVLS uses the term **family violence** as an overarching term that encompasses domestic and family violence, sexual violence, coercive control and related forms of abuse. For Aboriginal and Torres Strait Islander people, violence may extend beyond the narrow lens of intimate partner relationships and can involve violence within family, kinship and community networks as well as the misuse of systems and institutions to exert power and control. The term recognises the broad and intergenerational impacts of violence on individuals, families, communities and culture.

QIFVLS also uses the term **victim-survivor** to recognise both the harm experienced through violence and the strength, resilience and leadership demonstrated by Aboriginal and Torres Strait Islander people affected by violence. The term recognises that healing and recovery are ongoing journeys and many people continue to navigate the impacts of violence while caring for families and kin, maintaining cultural connections and contributing to their community.

1.1 QIFVLS Reform Priorities

QIFVLS' position is clear: Australia will not achieve the objectives of the National Plan or Closing the Gap Target 13 unless Aboriginal and Torres Strait Islander communities are empowered and resourced to lead prevention, early intervention, healing, justice and accountability responses.

QIFVLS calls on governments to prioritise the following reforms through the Second Action Plan:

1. **Priority 1 - Invest in Aboriginal and Torres Strait Islander community-controlled organisations as leaders in ending family violence:** Aboriginal and Torres Strait Islander communities must be at the centre of reform. Governments will not achieve the objectives of the National Plan without genuine partnership, implementation of the Closing the Gap Priority Reforms and sustained investment in ACCOs.
2. **Priority 2 - Invest in prevention, healing and social and emotional wellbeing:** Governments cannot respond to family violence through crisis services alone. Long-term reductions in family violence require sustained investment in Aboriginal and Torres Strait Islander-led prevention, healing, and social and emotional wellbeing initiatives that strengthen protective factors and support recovery.
3. **Priority 3 - Keep Aboriginal and Torres Strait Islander children safely connected to family, culture and community:** Aboriginal and Torres Strait Islander children should be supported to remain safely connected to family, culture, community and Country. Reforms must be guided by the Aboriginal and Torres Strait Islander Child Placement Principle and recognise children as victim-survivors in their own right.
4. **Priority 4 - Support Aboriginal and Torres Strait Islander-led approaches to accountability and community safety:** Responses to people who use violence must maintain a clear focus on victim-survivor safety while supporting Aboriginal and Torres Strait Islander communities to develop culturally grounded approaches that strengthen accountability, promote behaviour change and improve community safety.

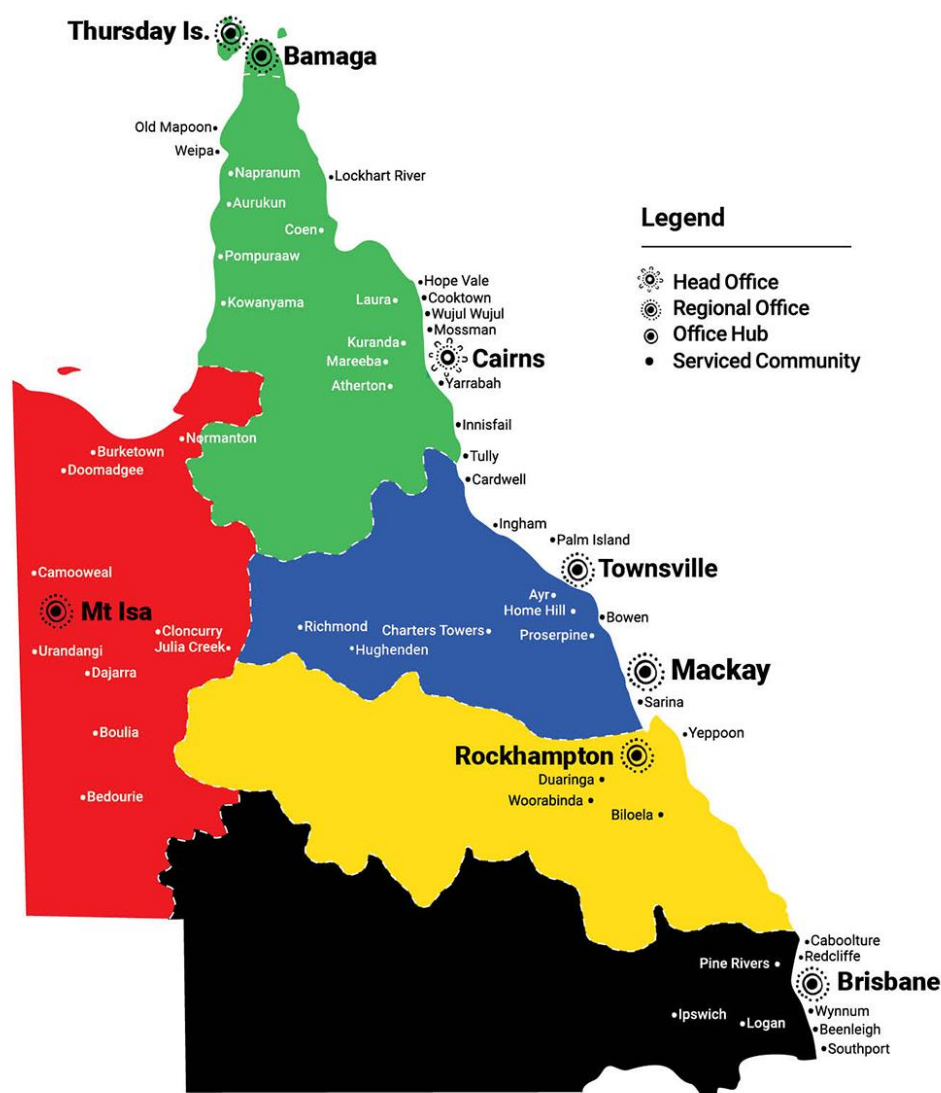
These priorities reflect the vision of Our Ways and recognise that lasting reductions in family violence will only be achieved when Aboriginal and Torres Strait Islander communities are empowered to lead the solutions.

2. Background

2.1 About QIFVLS

QIFVLS is an Aboriginal and Torres Strait Islander Community Controlled Organisation and a Family Violence Prevention and Legal Service (FVPLS) provider. QIFVLS provides integrated legal and support services to Aboriginal and Torres Strait Islander victim-survivors of family violence, domestic violence and sexual assault.

QIFVLS operates from eight (8) offices (including our Head Office) and delivers services to more than 90 communities across Queensland through a place-based outreach model. This map represents QIFVLS' geographic service delivery spread:



In addition to family violence and sexual assault matters, QIFVLS supports clients across family law, child protection, Victim Assist Queensland applications, victim support and minor civil law matters (ie Blue Card assistance and QCAT reviews), recognising that victim-survivors often experience multiple and interconnected legal and non-legal needs.

Working across metropolitan, regional, rural and remote Queensland, QIFVLS sees firsthand the barriers Aboriginal and Torres Strait Islander victim-survivors face. This experience informs the observations and recommendations contained in this submission.

2.2 The role of Aboriginal and Torres Strait Islander community-controlled legal services

Aboriginal and Torres Strait Islander community-controlled legal services are essential to Australia's response to domestic and family violence and sexual assault. For many Aboriginal and Torres Strait Islander victim-survivors, legal assistance is frequently the gateway to accessing safety, justice and broader systems of support.¹

Through culturally safe and trauma-informed practice, Aboriginal and Torres Strait Islander community-controlled legal services assist victim-survivors to navigate complex legal issues while facilitating access to housing, health, child and family services, financial assistance and social and emotional wellbeing supports.² This recognises the reality that victim-survivors rarely experience legal issues in isolation and often require coordinated support across multiple systems.

QIFVLS' experience demonstrates that victim-survivors are more likely to seek assistance, disclose violence and remain engaged when support services are delivered by trusted, community-controlled organisations. Strengthening and investing in Aboriginal and Torres Strait Islander community-controlled legal services must therefore be a core component of the Second Action Plan. Without accessible, culturally safe legal assistance, many Aboriginal and Torres Strait Islander victim-survivors will continue to face barriers to safety, justice, and long-term wellbeing.

3. Response to Priority 1: Victim-Survivors

Aboriginal and Torres Strait Islander women experience family violence at disproportionately high rates and remain less likely to access to legal, justice and

¹ PricewaterhouseCoopers Australia. (2024). *Independent review of the National Legal Assistance Partnership 2020–2025: Final report*. Attorney-General's Department, Australian Government.

² Ibid.

support systems intended to protect them.³ Without targeted action to address these inequities, governments will not achieve the National Plan's objectives of improving safety, access to justice and recovery outcomes for victim-survivors.

It is also important to stress that Aboriginal and Torres Strait Islander women experience violence not only from Aboriginal and Torres Strait Islander men but also from non-Aboriginal and Torres Strait Islander men, including systemic violence when they seek help.

For many Aboriginal and Torres Strait Islander victim-survivors, barriers to support are systemic.⁴ Service gaps, workforce shortages, geographic isolation, racism, discrimination and institutional mistrust continue to limit access to assistance, particularly in regional, rural and remote communities.⁵ As a result, victim-survivors are often required to navigate complex and fragmented systems at a time of crisis.

The Second Action Plan should prioritise:

- (a) strengthening access to culturally safe legal assistance;
- (b) supporting integrated and community-controlled responses; and
- (c) responding to coercive control and emerging forms of abuse

3.1 Strengthening access to culturally safe legal assistance

Access to culturally safe legal assistance is fundamental to victim-survivor safety, justice and protection. Without it, many Aboriginal and Torres Strait Islander victim-survivors are unable to access protection orders, navigate family law proceedings, secure safe parenting arrangements or effectively navigate the legal system. Governments will not achieve the objectives of the National Plan while Aboriginal and Torres Strait Islander victim-survivors continue to face unequal access to justice.

Aboriginal and Torres Strait Islander community-controlled legal services and in particular, FVPLS's are uniquely positioned to address barriers experienced by victim-survivors. Governed by and accountable to the communities they serve, these community-controlled organisations provide culturally safe legal assistance grounded in trust, community connection and local knowledge. Their role extends beyond legal representation to include advocacy, safety planning, referral and practical supports that help victim-survivors navigate complex and often fragmented systems.

³ Australian Institute of Health and Welfare. (2025). *Family, domestic and sexual violence*. AIHW; Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. ANROWS.

⁴ Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. Australia's National Research Organisation for Women's Safety (ANROWS).

⁵ Ibid.

QIFVLS supports Aboriginal and Torres Strait Islander victim-survivors to navigate complex family law matters that arise alongside family violence. Timely access to culturally safe legal assistance protects the safety and wellbeing of both victim-survivors and their children while ensuring families are able to effectively engage with the legal system.



CASE STUDY: Protecting a child's wellbeing through culturally safe legal assistance

QIFVLS assisted an Aboriginal and Torres Strait Islander mother of three children who sought urgent legal assistance after her former partner refused to return their son following contact arrangements. The child, who has an intellectual disability and relies on daily medication and specialist appointments, had lived primarily with his mother for several years.

When the mother attempted to collect her son, she was informed that the father had obtained an urgent recovery order. QIFVLS immediately prepared and filed an application and arranged legal representation. In the week before the matter was heard, the child had reportedly not received his prescribed medication, had missed specialist appointments and had limited contact with his mother, causing significant concern for his wellbeing and routine.

QIFVLS provided ongoing legal advice and representation throughout the proceedings. Following consideration of the evidence, the Court found that the father's actions were not in the child's best interests and ordered the child be returned to his mother's care. The matter demonstrates the importance of timely, culturally safe legal assistance in supporting Aboriginal and Torres Strait Islander families to navigate complex legal issues, protect children's wellbeing and maintain stability during periods of family conflict.

This case study demonstrates that timely legal assistance can have immediate and life-changing consequences for the safety and wellbeing of Aboriginal and Torres Strait Islander children and families. However, access to that support depends on a strong, sustainable and properly resourced FVPLS sector.

The Second Action Plan should recognise culturally safe legal assistance as an essential service. Sustained investment in Aboriginal and Torres Strait Islander community-controlled legal services is critical to ensuring victim-survivors can access safety, justice and support wherever they live.



REFORM OPPORTUNITY: Strengthening access to justice through a sustainable FVPLS sector

Workforce shortages, recruitment challenges and increasing demand continue to place unsustainable pressure on community-controlled legal services, particularly in regional, rural and remote communities.

The Independent Review of the National Legal Assistance Partnership identified workforce sustainability as a key challenge across the legal assistance sector and recommended targeted action to strengthen recruitment, retention and workforce capability. While the National Access to Justice Partnership 2025–2030 includes a commitment to develop a National Legal Assistance Workforce Strategy by June 2027, workforce shortages continue to affect service delivery across the FVPLS sector.

Access remains a significant challenge for many Aboriginal and Torres Strait Islander victim-survivors. Despite the critical role of FVPLS's, substantial gaps in geographic coverage remain across Australia. Expanding access to culturally safe legal assistance should remain a priority, particularly in regional, rural and remote communities where victim-survivors often face the greatest barriers to support.

The Second Action Plan should support implementation of the National Legal Assistance Workforce Strategy and recognise equitable access to culturally safe legal assistance as a core component of victim-survivor safety. Aboriginal and Torres Strait Islander women should not be required to travel unreasonable distances to access specialist, community-controlled legal assistance.

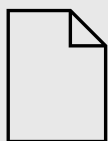
RECOMMENDATIONS

- Embed culturally safe legal assistance as a core component of victim-survivor safety, recovery, and access to justice under the Second Action Plan.
- Increase long-term investment in Aboriginal and Torres Strait Islander community controlled legal services, including FVPLS's, to meet growing demand and improve service accessibility.
- Expand access to culturally safe, place-based legal assistance for Aboriginal and Torres Strait Islander victim-survivors across metropolitan, regional, rural and remote communities.

3.2 Supporting integrated and community-controlled responses

Fragmented service systems shift the burden of coordination onto victim-survivors at a time of heightened risk and vulnerability.⁶ Governments cannot expect improved outcomes while maintaining service systems that require victim-survivors to repeatedly navigate multiple agencies, retell traumatic experiences and coordinate their own support. These fragmented systems create barriers to safety and increase the likelihood that victim-survivors disengage from support, fall through service gaps and remain exposed to ongoing risk.⁷ Improving outcomes for victim-survivors requires coordinated, culturally safe and community-controlled responses that recognise the interconnected nature of legal, social and practical support needs.

Community-controlled organisations are uniquely placed to deliver these responses. QIFVLS' integrated practice model combines legal assistance with embedded case management. This enables victim-survivors to access coordinated support through a trusted service while addressing practical barriers that may affect their safety, wellbeing and engagement with the legal system.



PRACTICE EXAMPLE: QIFVLS Integrated Service Model

Victim-survivors often require support across multiple systems at the same time. Through the QIFVLS integrated service model, legal assistance is complemented by culturally safe case management, including risk assessment, safety planning, referrals, advocacy and practical support to address barriers relating to housing, health, child protection, financial hardship and social and emotional wellbeing.

The establishment of the Case Management Services Unit (CMSU) strengthens this approach by providing statewide specialist oversight, secondary risk assessment, structured case review and practice support for complex matters. This enables more consistent, accountable and trauma-informed responses for Aboriginal and Torres Strait Islander victim-survivors experiencing domestic, family and sexual violence, while improving service quality, workforce support and system coordination.

One of the most significant learnings from the implementation of the case management service model was the importance of responding to the whole person, rather than only the presenting legal issue. From QIFVLS' early implementation experience, the value of integration is not measured by how many referrals are made. It is measured by whether services communicate with one another, whether

⁶ Australia's National Research Organisation for Women's Safety. (2022). *Transforming the service system for victim-survivors of domestic and family violence and sexual assault*. ANROWS.

⁷ Ibid; Department of Social Services. (2022). *National Plan to End Violence against Women and Children 2022–2032*. Australian Government.

victim-survivors feel supported instead of overwhelmed, whether victim-survivors have to repeat their story multiple times and whether someone remains alongside them while circumstances continue to change. Although the refined service (which has been built off an initial model trialled by QIFVLS and independently evaluated) has only been operating since March 2026, practitioners are already observing that coordinated legal and case management services reduce fragmentation, strengthen engagement and provide greater continuity for victim-survivors navigating multiple systems simultaneously.

QIFVLS is continuing to build the evidence base of what works for an integrated service model through implementation, monitoring, quality assurance, cultural governance, client and community feedback, and ongoing evaluation. While it is still too early to quantify the long-term outcomes, the early implementation experience provides confidence that integrated, community-controlled and culturally governed responses offer a stronger foundation for improving safety, wellbeing, healing and self-determination for Aboriginal and Torres Strait Islander women, children, families and communities.

Victim-survivors should not be responsible for coordinating the systems intended to support them. The Second Action Plan should invest in integrated, community-controlled service models that deliver coordinated responses across legal, health, housing and community services.

RECOMMENDATIONS

- Invest in Aboriginal and Torres Strait Islander community-controlled organisations to deliver integrated responses that combine legal assistance with case management, advocacy and broader support services.
- Strengthen cross-sector referral pathways and service coordination between legal assistance, housing, child protection, health and community services.
- Support place-based and community-led service models that enable Aboriginal and Torres Strait Islander organisations to design and deliver responses that reflect local needs and priorities.

3.3 Strengthening responses to coercive control and emerging forms of abuse

Coercive control sits at the centre of family violence.⁸ Yet, many Aboriginal and Torres Strait Islander victim-survivors continue to experience patterns of abuse that remain misidentified, hidden or misunderstood by the systems intended to protect them.⁹ As

⁸ Stark, E. (2007). *Coercive control: How men entrap women in personal life*. Oxford University Press; Women's Safety and Justice Taskforce. (2021). *Hear her voice – Report one – Addressing coercive control and domestic and family violence in Queensland*. Queensland Government.

⁹ Women's Safety and Justice Taskforce. (2022). *Hear her voice – Report two – Women and girls' experiences across the criminal justice system*. Queensland Government.

governments strengthen legislative and policy responses to coercive control, Aboriginal and Torres Strait Islander communities must be supported to recognise, respond to and recover from these forms of abuse. Raising awareness of coercive control is essential, but awareness alone does not guarantee access to support. Aboriginal and Torres Strait Islander victim-survivors must also be able to access culturally safe legal assistance, community support and practical pathways to safety.

Coercive control can extend beyond intimate partner relationships and involve the misuse of child protection systems, family law proceedings, financial dependence, community relationships and other institutions to maintain power and control.¹⁰ People who use violence may exploit existing power imbalances, including fear of child removal, institutional mistrust and experiences of racism and discrimination, to further entrench control and undermine a victim-survivor's credibility.¹¹ Technology-facilitated abuse, image-based abuse and systems abuse are expanding the ways violence can be perpetrated, monitored and concealed.¹² When these forms of abuse are not recognised, systems intended to protect victim-survivors can become mechanisms through which abuse is reinforced.¹³



CASE STUDY: Recognising coercive control and systems abuse

QIFVLS was approached by an Aboriginal and Torres Strait Islander woman who had recently been named as the respondent on a Police Protection Notice and had her youngest child removed from her care by Child Safety. Following initial engagement, QIFVLS formed the view that the woman had been misidentified as the person using violence and was, in fact, experiencing extensive domestic and family violence, including coercive control, physical violence and systems abuse perpetrated by her former partner.

The woman disclosed a history of serious physical violence, including strangulation and assaults that resulted in significant injuries. Throughout the relationship, her former partner closely monitored her movements, attended her medical appointments and exercised significant control over her interactions with services. He had also made repeated reports to police and health professionals alleging that the woman was violent and experiencing significant mental health issues. As a result, by the time the woman sought assistance, concerns had already been raised with statutory agencies regarding her capacity to safely parent her child.

¹⁰ Douglas, H. (2018). *Legal systems abuse and coercive control*. *Criminology & Criminal Justice*, 18(1), 84–99.

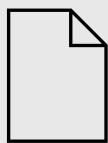
¹¹ Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. Australia's National Research Organisation for Women's Safety (ANROWS); SNAICC – National Voice for our Children. (2021). *The Family Matters Report 2021*. SNAICC.

¹² Australia's National Research Organisation for Women's Safety. (2022). *Technology-facilitated abuse and domestic and family violence: Women's experiences*. ANROWS.

¹³ Douglas, H. (2018). *Legal systems abuse and coercive control*. *Criminology & Criminal Justice*, 18(1), 84–99.

QIFVLS provided legal advice and representation in relation to the Police Protection Notice and child protection proceedings and supported the woman to engage with police and Child Safety. Following further incidents involving the former partner, police and Child Safety developed a greater understanding of the pattern of coercive control and abuse the woman had experienced. QIFVLS subsequently supported the woman in seeking protection from her former partner and continues to assist her to engage with child protection processes and work towards reunification with her child.

This case study demonstrates the significant impacts coercive control can have when patterns of abuse are not recognised early. When coercive control is not recognised, systems can become tools of abuse. Victim-survivors may be misidentified as perpetrators, disbelieved by authorities or subjected to interventions that reinforce the very harm those systems are intended to prevent. Effective responses require more than legislative reform. They require culturally safe education, workforce capability and community awareness so that victim-survivors are identified, believed and supported early.



PRACTICE EXAMPLE: QIFVLS partnership with the Department of Justice (QLD)

In 2025, QIFVLS delivered coercive control training, education and awareness workshops in partnership with the Queensland Department of Justice's First Nations Justice Office and Indigenous Justice Program. These workshops were designed to build understanding of coercive control among Aboriginal and Torres Strait Islander community members and frontline service providers within the 52 Community Justice Groups across Queensland, including how coercive control can manifest in different relationships and contexts.

The training package included the delivery of a work book, PowerPoint presentations as well as the facilitation of learning firstly through an initial on-line learning workshop, which was then followed by a more intensive in-person workshop that ran between 1.5-2 days.

Evaluation data demonstrated the effectiveness of these initiatives. Across in-person workshop cohorts delivered in Brisbane, the Torres Strait and Northern Peninsula Area, and Cairns, participants reported increased understanding of coercive control, improved confidence in recognising patterns of abuse, and greater awareness of available support pathways. Participants consistently identified the cultural relevance of the training, practical examples, and community discussions as key strengths. There was also strong demand for further education on family

violence, family law, child protection and culturally informed responses to coercive control.

Similarly, participants in QIFVLS' online coercive control training reported increased awareness of coercive control, improved understanding of behavioural indicators and escalation patterns, and enhanced confidence in supporting community members experiencing abuse. All participants reported that the training provided clearer information about coercive control, while almost all participants identified the training as extremely useful in supporting their work within community.

The Second Action Plan is an opportunity to strengthen Aboriginal and Torres Strait Islander-led responses to coercive control and emerging forms of abuse. This requires sustained investment in community education, workforce capability and community-controlled services that can respond to increasingly complex patterns of violence and ensure victim-survivors can access support before abuse escalates.

RECOMMENDATIONS

- Invest in Aboriginal and Torres Strait Islander-led responses to coercive control and emerging forms of abuse, including culturally safe support services, workforce capability building and community education initiatives.
- Strengthen legal, justice and community sector capability to identify and respond to coercive control, technology-facilitated abuse, systems abuse and financial abuse.

4. Response to Priority 2: Prevention and Early Intervention

Australia cannot end family violence through crisis response alone. While crisis services remain essential, governments will not reduce rates of violence by investing primarily in responses after harm has occurred.¹⁴ Lasting change requires sustained upstream investment in prevention, healing and early intervention.

Aboriginal and Torres Strait Islander communities have long led prevention efforts through initiatives that strengthen culture, healing, family relationships and community connection.¹⁵ These are critical protective factors that help prevent violence, support

¹⁴ Our Watch. (2021). *Change the story: A shared framework for the primary prevention of violence against women in Australia* (2nd ed.). Our Watch.

¹⁵ Australian Government. (2023). *Aboriginal and Torres Strait Islander Action Plan 2023–2025 under the National Plan to End Violence against Women and Children 2022–2032*. Commonwealth of Australia; Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS), & VicHealth. (2018). *Changing the picture: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*. Our Watch.

healing and strengthen resilience. Yet, prevention and early intervention continue to receive significantly less attention and investment than crisis responses.

The Second Action Plan should prioritise:

- (a) strengthening social and emotional wellbeing;
- (b) supporting earlier access to culturally safe legal assistance and integrated support; and
- (c) building community capability, workforce planning and local leadership.

4.1 Strengthening social and emotional wellbeing

Family violence cannot be prevented by crisis response alone. Current investment remains heavily weighted towards responding after harm has occurred, while prevention, healing, and social and emotional wellbeing comparatively receive less investment.¹⁶ As a result, governments continue to bear the escalating social and economic costs of family violence while failing to address many of its underlying drivers.

For Aboriginal and Torres Strait Islander communities, social and emotional wellbeing is not separate from violence prevention.¹⁷ Strong connections to culture, Country, family and community are protective factors that support safety, resilience, healing and wellbeing.¹⁸ Strengthening these protective factors reduces vulnerability to violence and supports stronger outcomes for individuals, families and communities.

The *National Strategic Framework for Aboriginal and Torres Strait Islander Peoples' Mental Health and Social and Emotional Wellbeing* recognises that wellbeing is shaped by a broad range of social, cultural and economic determinants.¹⁹ Investment in these determinants is, at its core, violence prevention.

ACCOs are uniquely placed to deliver these responses because they can address legal, social, cultural and wellbeing needs through a single, culturally safe service. QIFVLS' experience demonstrates that victim-survivors rarely present with legal issues in isolation. Family violence frequently intersects with housing insecurity, financial hardship, child protection involvement, trauma and broader social and emotional wellbeing needs. Effective responses must reflect this reality. Community-

¹⁶ Our Watch. (2021). *Change the story: A shared framework for the primary prevention of violence against women in Australia* (2nd ed.). Our Watch.

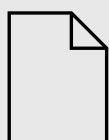
¹⁷ Australian Government. (2017). *National strategic framework for Aboriginal and Torres Strait Islander peoples' mental health and social and emotional wellbeing 2017–2023*. Department of the Prime Minister and Cabinet.

¹⁸ Gee, G., Dudgeon, P., Schultz, C., Hart, A., & Kelly, K. (2014). *Aboriginal and Torres Strait Islander social and emotional wellbeing*. In P. Dudgeon, H. Milroy, & R. Walker (Eds.), *Working together: Aboriginal and Torres Strait Islander mental health and wellbeing principles and practice* (2nd ed.). Commonwealth of Australia.

¹⁹ Australian Government. (2017). *National strategic framework for Aboriginal and Torres Strait Islander peoples' mental health and social and emotional wellbeing 2017–2023*. Department of the Prime Minister and Cabinet..

controlled services are able to effectively respond as they are connected, culturally safe, community-led and capable of responding to the complex realities experienced by Aboriginal and Torres Strait Islander individuals, children, families and communities.

QIFVLS' evolving case management model demonstrates how community-controlled organisations can embed healing, social and emotional wellbeing, and practical supports within family violence responses in recognition that recovery requires more than legal assistance alone.



PRACTICE EXAMPLE: Strengthening social and emotional wellbeing through Therapeutic Case Management

QIFVLS is implementing a staged transition of its CMSU to strengthen social and emotional wellbeing outcomes for Aboriginal and Torres Strait Islander victim-survivors. During the initial phase, the CMSU will establish statewide governance, risk management, supervision and quality assurance mechanisms to support integrated legal and case management practice. Once these foundations are embedded, QIFVLS intends to progressively introduce therapeutic, neuro-informed and trauma-informed approaches through enhanced screening, holistic assessment and trauma-informed case formulation.

In later phases, it is intended that the model will incorporate multidisciplinary therapeutic oversight and stronger integration with healing, health and wellbeing services. This staged approach recognises that social and emotional wellbeing is integral to safety and recovery and seeks to embed healing-centred practice alongside legal and practical support

The Second Action Plan should recognise Aboriginal and Torres Strait Islander social and emotional wellbeing as essential violence prevention infrastructure. Sustained investment in Aboriginal and Torres Strait Islander-led healing and wellbeing responses is critical to reducing family violence, strengthening resilience and improving long-term outcomes for Aboriginal and Torres Strait Islander families and communities.

RECOMMENDATIONS

- Increase investment in Aboriginal and Torres Strait Islander-led healing, social and emotional wellbeing and cultural strengthening initiatives as core violence prevention infrastructure.
- Support community-led initiatives that strengthen connection to culture, Country, family and community as protective factors against family violence.

- Embed healing-centred and trauma-informed approaches within family violence prevention and early intervention responses.

4.2 Earlier access to culturally safe legal assistance and integrated support

Early intervention improves outcomes for families and reduces demand on statutory systems.²⁰ Yet, many Aboriginal and Torres Strait Islander victim-survivors and families do not access legal assistance or support until risks have escalated, statutory intervention has occurred and critical decisions have already been made.²¹

For Aboriginal and Torres Strait Islander victim-survivors, earlier access to culturally safe legal assistance can help prevent issues from escalating into crisis. Community-controlled legal services are uniquely placed to identify emerging risks, support informed decision-making, connect families with broader services and assist victim-survivors to understand and exercise their rights before statutory intervention becomes necessary.

QIFVLS' experience demonstrates that legal assistance can play a critical prevention and early intervention role, particularly where violence intersects with child protection, housing insecurity, financial hardship and other forms of vulnerability. Governments should recognise safe legal assistance as part of Australia's prevention infrastructure and invest accordingly. This should include investment in system-wide early intervention through proactive referral pathways, including an Aboriginal and Torres Strait Islander Child Protection Notification and Referral Scheme, which QIFVLS has proactively voiced in its advocacy, most recently in its capacity as a party to proceedings to Queensland's Commission of Inquiry into the Child Safety System.



CASE STUDY: The importance of early intervention before child protection escalation

QIFVLS was referred a 15-year-old Aboriginal and Torres Strait Islander young person who was pregnant and due to give birth within weeks. The young person was subject to a Long-Term Guardianship Order to the Chief Executive and residing in a residential care placement. Although she had been advised that her baby would not be able to remain with her once born, she had not been provided with clear

²⁰ Australian Institute of Family Studies. (2020). *The economic cost of violence against women and their children in Australia*. Australian Government; SNAICC – National Voice for our Children. (2021). *The Family Matters Report 2021*. SNAICC.

²¹ Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. Australia's National Research Organisation for Women's Safety (ANROWS); SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC.

information about future care arrangements, the concerns held by Child Safety, or the planning that had occurred for her and her baby following the birth.

QIFVLS acted quickly to provide legal and advocacy support and facilitated discussions with Child Safety before the birth. However, given the late stage of the pregnancy, there was limited opportunity to undertake comprehensive planning or explore options that may have supported the young person and her baby to remain together safely.

Following the birth, Child Safety obtained a Temporary Custody Order for the baby prior to discharge from hospital. The young person returned to her residential care placement while her baby was placed in foster care. Child Safety has since applied for a two-year Short-Term Custody Order. QIFVLS continues to support the young person to engage with Child Safety, understand the department's concerns and work towards reunification goals.

This case study demonstrates the consequences of delayed engagement. By the time legal assistance was accessed, there was limited opportunity to undertake meaningful planning, address concerns or explore options that may have supported the mother and her baby to remain together safely after the baby was born. Earlier access to culturally safe legal assistance may have enabled stronger planning, clearer communication and greater support before statutory intervention occurred.

The Second Action Plan should recognise culturally safe legal assistance as a core prevention and early intervention strategy. Earlier access to legal assistance helps families understand their rights, engage with services, address emerging risks and access support before matters reach crisis point.



REFORM OPPORTUNITY: Child Protection Notification and Referral Scheme

Fear of child protection involvement remains a significant barrier to help-seeking for many Aboriginal and Torres Strait Islander victim-survivors. Concerns about child removal, negative experiences with statutory systems and the ongoing legacy of the Stolen Generations continue to shape how families engage with services and government agencies.

Earlier access to culturally safe legal assistance can address these barriers by ensuring families understand their rights, receive independent advice and are connected with support before concerns escalate. This is particularly important where family violence is a contributing factor to child protection involvement.

QIFVLS, alongside our sister Family Violence Prevention Legal Services and our Peak, the First Nations Advocates Against Family Violence (FNAAFV), supports the establishment of an Aboriginal and Torres Strait Islander Child Protection Notification and Referral Scheme. Earlier referral to culturally safe legal assistance would enable families to access advice, advocacy and support at the earliest stage of child protection involvement rather than after key decisions have already been made.

The Child Protection Notification and Referral Scheme was a key recommendation made by QIFVLS during the recent Independent Commission of Inquiry into Queensland's Child Safety system.

RECOMMENDATIONS

- Recognise culturally safe legal assistance as a prevention and early intervention strategy and embed legal assistance within integrated family violence responses.
- Increase investment in Aboriginal and Torres Strait Islander community controlled legal services to support earlier engagement with individuals and families experiencing family violence and related risks.
- Implement mechanisms, including Child Protection Notification and Referral Schemes, that facilitate earlier referral to culturally safe legal assistance and support services.

4.3 Community capability, workforce and local leadership

Workforce sustainability is one of the most significant implementation risks facing the National Plan. Without a sustainable Aboriginal and Torres Strait Islander workforce, governments will struggle to translate policy commitments into measurable improvements in safety and wellbeing outcomes.

Aboriginal and Torres Strait Islander community-controlled organisations play a critical role in prevention and early intervention work. Beyond service delivery, they contribute to community development, workforce capability, cultural continuity and local decision-making. Consistent with Closing the Gap, strengthening the community-controlled sector is critical to achieving sustainable improvements in safety and wellbeing.²²

Despite this, workforce shortages remain a significant barrier to delivering effective prevention and early intervention responses.²³ Community-controlled organisations continue to face significant recruitment and retention challenges. Short-term funding

²² Coalition of Peaks & Australian Governments. (2020). *National Agreement on Closing the Gap*. Commonwealth of Australia; Productivity Commission. (2024). *Review of the National Agreement on Closing the Gap*. Commonwealth of Australia.

²³ PricewaterhouseCoopers Australia. (2024). *Independent review of the National Legal Assistance Partnership 2020–2025: Final report*. Attorney-General's Department, Australian Government.

arrangements, workforce burnout and increasing demand have intensified these pressures.²⁴ Without targeted action, these pressures will continue to constrain the sector's ability to deliver prevention and early intervention initiatives and respond to growing demand.

Sustainable reform also requires investment in the infrastructure that supports Aboriginal and Torres Strait Islander leadership across the family violence sector. Queensland does not have a dedicated Aboriginal and Torres Strait Islander family violence peak body. This represents a significant gap in the state's family violence infrastructure and limits opportunities for coordinated Aboriginal and Torres Strait Islander leadership, sector development and engagement in statewide reform processes.

Governments cannot expect Aboriginal and Torres Strait Islander communities to lead solutions while underinvesting in the workforce, organisations and infrastructure required to support that leadership. The Second Action Plan should prioritise sustained investment in ACCOs, workforce development initiatives and sector leadership to ensure communities are equipped to drive long-term reform.



REFORM OPPORTUNITY: Establishment of a Queensland Aboriginal and Torres Strait Islander Family Violence Peak Body

Aboriginal and Torres Strait Islander community-controlled organisations play an essential role in preventing and responding to family violence across Queensland. A key gap in Queensland's family violence service system is the absence of a dedicated Aboriginal and Torres Strait Islander family violence peak body. Without a strong statewide voice to lead sector development and systems reform, Aboriginal and Torres Strait Islander organisations are required to engage government on a fragmented basis, reducing the sector's collective capacity to influence policy, drive reform and support sustainable workforce and service development.

The success of the National Plan depends on strong Aboriginal and Torres Strait Islander sector infrastructure capable of leading reform, supporting workforce development and partnering with governments. Establishing and sustainably funding a Queensland Aboriginal and Torres Strait Islander family violence peak body as a key action under the Second Plan would strengthen community capability, facilitate collaboration across the sector and advance Closing the Gap Priority Reforms by supporting self-determination, community control and shared decision-making.

²⁴ Ibid.

RECOMMENDATIONS

- Invest in long-term Aboriginal and Torres Strait Islander workforce development across the family violence, legal assistance, health, social and emotional wellbeing and child and family supports sector.
- Support local leadership, community capability and self-determination by investing in Aboriginal and Torres Strait Islander organisations as key prevention infrastructure.
- Support the establishment and ongoing resourcing of a Queensland Aboriginal and Torres Strait Islander family violence peak body to provide statewide sector leadership, policy advocacy, workforce development and systems reform expertise.

5. Response to Priority 3: Children in their own right

Aboriginal and Torres Strait Islander children are disproportionately represented across child protection and youth justice systems.²⁵ These outcomes do not occur in isolation. Family violence, intergenerational trauma, child protection involvement and youth justice contact are deeply interconnected and often reflect the cumulative impacts of unmet need, structural disadvantage and system failures.²⁶

Government will not reduce the overrepresentation of Aboriginal and Torres Strait Islander children in statutory systems without addressing family violence and trauma. Effective responses must strengthen children's safety while supporting their connection to family, culture, community and Country.

Consistent with the Aboriginal and Torres Strait Islander Child Placement Principle, reforms affecting Aboriginal and Torres Strait Islander children should prioritise family preservation, cultural connection, self-determination and Aboriginal and Torres Strait Islander-led decision-making.²⁷ The Second Action Plan is an opportunity to strengthen child-centred responses that recognise children as victim-survivors in their own right and invest in the protective factors that support healing, resilience, and social and emotional wellbeing.

The Second Action Plan should prioritise:

- (a) protecting children's rights to family, culture and identity;

²⁵ Australian Institute of Health and Welfare. (2025). *Child protection Australia 2023–24*. AIHW; Australian Institute of Health and Welfare. (2025). *Youth justice in Australia 2023–24*. AIHW.

²⁶ The Healing Foundation. (2023). *Are you waiting for us to die? The unfinished business of Bringing Them Home*. The Healing Foundation; SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC; Australian Institute of Health and Welfare. (2025). *Child protection Australia 2023–24*. AIHW; Australian Institute of Health and Welfare. (2025). *Youth justice in Australia 2023–24*. AIHW.

²⁷ SNAICC – National Voice for our Children. (2018). *The Aboriginal and Torres Strait Islander Child Placement Principle: A guide to support implementation*. SNAICC.

- (b) preventing the criminalisation of Aboriginal and Torres Strait Islander children affected by family violence; and
- (c) strengthening Aboriginal and Torres Strait Islander-led healing responses.

5.1 Protecting children's rights to family, culture and identity

Efforts to end family violence cannot be separated from efforts to reduce the overrepresentation of Aboriginal and Torres Strait Islander children in statutory systems.²⁸ Family violence is a significant driver of child protection involvement and many Aboriginal and Torres Strait Islander families are required to navigate family violence, child protection and legal systems simultaneously.²⁹

QIFVLS regularly supports families experiencing family violence and child protection involvement at the same time.



CASE STUDY: Supporting Family Preservation and connection to family

QIFVLS supported an Aboriginal and Torres Strait Islander mother experiencing domestic violence. The family had also become involved with the child protection system due to concerns about her ability to care for her children. At the time, the mother was living in a motel after leaving an unsafe relationship and was caring for several young children, including a newborn. Child Safety sought long-term guardianship orders for five children.

Throughout the proceedings, the mother faced significant barriers associated with family violence, including housing instability and ongoing abuse from the children's father. QIFVLS provided legal representation, advocacy and practical support to assist the mother to engage with Child Safety, attend appointments and court proceedings, access support services and address concerns relating to the children's safety and wellbeing. The matter involved extensive negotiations, family group meetings and a contested hearing.

Following consideration of the evidence, the Court refused Child Safety's application for long-term guardianship orders and instead made supervision and protection orders, enabling the children to remain in their mother's care with appropriate supports in place.

This case study demonstrates the importance of culturally safe legal assistance, early intervention and sustained support in helping Aboriginal and Torres Strait Islander

²⁸ SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC.

²⁹ Ibid; Australian Institute of Health and Welfare. (2025). *Child protection Australia 2023–24*. AIHW.

families navigate family violence and child protection involvement, while supporting children to remain safely connected to family, culture and community.

For many Aboriginal and Torres Strait Islander victim-survivors, concerns about child protection involvement can also act as a barrier to seeking support. Fear of child removal, negative experiences with statutory experiences and the ongoing legacy of the Stolen Generations continue to influence how families engage with services and government agencies.³⁰

Recent child protection reform discussions in Queensland have renewed consideration of adoption as a permanency pathway for children in out-of-home care, including through recommendations arising from the Queensland Child Safety Commission of Inquiry.³¹ In its final submission to the Commission of Inquiry, QIFVLS strongly argued against adoption being established in the permanency hierarchy for Aboriginal and Torres Strait Islander children. Any reform that increases reliance on adoption for Aboriginal and Torres Strait Islander children carries significant policy, cultural and historical implications. Governments must ensure that efforts to improve permanency do not undermine commitments under Closing the Gap, the Child Placement Principle and broader efforts to reduce the overrepresentation of Aboriginal and Torres Strait Islander children in out-of-home care.

The Second Action Plan should recognise that supporting Aboriginal and Torres Strait Islander children to remain safely connected to family and kin, culture and community is a critical component of long-term safety, healing and wellbeing.

RECOMMENDATIONS

- Embed the Aboriginal and Torres Strait Islander Child Placement Principle across all reforms affecting Aboriginal and Torres Strait Islander children and families.
- Invest in early intervention, family preservation, reunification and kinship care initiatives that enable children to remain safely connected to family, culture and community.
- Reduce the overrepresentation of Aboriginal and Torres Strait Islander children in statutory systems through culturally safe, community-led responses to family violence.

5.2 Preventing the criminalisation of Aboriginal and Torres Strait Islander children affected by family violence

³⁰ SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC.

³¹ Child Safety Commission of Inquiry. (2026). *From pressure to purpose: Reforming child protection in Queensland*. Queensland Government. Recommendation 15.

Aboriginal and Torres Strait Islander children experience family violence at disproportionately high rates and remain significantly overrepresented across Australia's youth justice systems.³² These issues are deeply interconnected. For many children, contact with the youth justice system occurs in a broader context of adverse childhood experiences including family violence, intergenerational and cumulative trauma, child protection involvement, housing instability and unmet support needs.³³

Queensland's recent youth justice reforms have focused heavily on accountability and criminal justice responses.³⁴ While community safety remains critical, there is a risk that children who have experienced violence and trauma are increasingly met with punitive responses rather than support, healing and intervention. Government cannot arrest their way out of the consequences of family violence for children and young people. Without sustained investment in prevention, early intervention and community-led responses, systems will continue to respond to the symptoms of harm while failing to address its underlying drivers.

The Second Action Plan provides an opportunity to strengthen responses for Aboriginal and Torres Strait Islander children before they enter the youth justice system. This requires investment in culturally safe family violence prevention, legal assistance, family supports and community-controlled services that address risk early, strengthen protective factors and support connection. Reducing the overrepresentation of Aboriginal and Torres Strait Islander children in the youth justice system cannot be achieved through justice responses alone. It requires governments to address the family violence, trauma and structural disadvantage that too often sit behind children's system contact.

RECOMMENDATIONS

- Strengthen culturally safe legal assistance, advocacy and diversion programs for Aboriginal and Torres Strait Islander children affected by family violence.
- Improve coordination between family violence, child protection and youth justice systems to ensure children experiencing violence and trauma receive support before crisis point.
- Prioritise initiatives that contribute to Closing the Gap Target 11 by addressing the underlying drivers of Aboriginal and Torres Strait Islander children's contact with the youth justice system.

³² Australian Institute of Health and Welfare. (2025). *Family, domestic and sexual violence*. AIHW; Australian Institute of Health and Welfare. (2025). *Youth justice in Australia 2023–24*. AIHW.

³³ Australian Institute of Health and Welfare. (2025). *Youth justice in Australia 2023–24*. AIHW; SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC; The Healing Foundation. (2023). *Are you waiting for us to die? The unfinished business of Bringing Them Home*. The Healing Foundation.

³⁴ Queensland Government. (2025). *Adult Crime, Adult Time legislative reforms*. Queensland Government.

5.3 Strengthening Aboriginal and Torres Strait Islander-led healing responses

Intergenerational trauma does not resolve through statutory intervention alone. Without sustained investment in healing, governments will continue to respond to the consequences of trauma rather than its underlying causes. Trauma affects how children experience safety, form relationships, regulate emotions, and develop a sense of identity and belonging.³⁵ Without access to healing responses, the impacts of family violence can continue long after the violence has ended which contributes to ongoing cycles of trauma, system involvement and disadvantage.

For Aboriginal and Torres Strait Islander children and young people, healing is a critical component of violence prevention, recovery and long-term wellbeing. The Healing Foundation and SNAICC have consistently identified healing as a holistic process that strengthens connections to family, culture, community, identity and Country while addressing the impacts of trauma.³⁶ Strong cultural identity, connection to community and supportive relationships are recognised as protective factors for children and young people that promote resilience and support recovery from adversity.

Effective healing responses recognise that children do not heal in isolation. Family violence often occurs within a broader context of intergenerational trauma, grief, loss and disadvantage.³⁷ Healing initiatives that focus solely on a child without supporting parents, carers and communities risk addressing symptoms while leaving underlying drivers unchanged. Aboriginal and Torres Strait Islander-led healing responses are uniquely placed to support recovery across families and communities while strengthening the protective factors that prevent future harm and cumulative trauma.

Emerging evidence continues to demonstrate the value of Aboriginal and Torres Strait Islander-led, place-based healing initiatives in improving social and emotional wellbeing, strengthening resilience, and supporting recovery from trauma.³⁸ Despite this, healing often remains peripheral to policy and funding frameworks. This must change.

Healing should be recognised as a distinct objective of the Second Action Plan rather than merely an outcome of service delivery. Investment in Aboriginal and Torres Strait

³⁵ Australian Childhood Foundation. (2021). *Making space for learning: Trauma-informed practice in schools*. Australian Childhood Foundation.

³⁶ The Healing Foundation. (2021). *Our healing, our way: Leading and shaping our future*. The Healing Foundation; SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC.

³⁷ Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS), & VicHealth. (2018). *Changing the picture: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*. Our Watch.

³⁸ The Healing Foundation. (2021). *Our healing, our way: Leading and shaping our future*. The Healing Foundation.

Islander-led healing initiatives should form a core component of child-centred responses to family violence.

RECOMMENDATIONS

- Recognise healing as a distinct policy objective within the Second Action Plan.
- Increase investment in Aboriginal and Torres Strait Islander-led healing initiatives for children, families and communities affected by family violence.
- Expand access to culturally grounded, place-based responses that strengthen connection to family, culture, community and Country.

6. Response to Priority 4: People who use violence

Victim-survivor safety must remain the non-negotiable foundation of all responses to people who use violence. However, governments will not reduce family violence by responding only after harm has occurred. Long-term reductions in violence require investment in approaches that strengthen accountability, support behaviour change and prevent future harm. Without effective responses to people who use violence, governments will continue to manage the consequences of violence rather than reduce its prevalence.

For Aboriginal and Torres Strait Islander communities, responses to people who use violence are complex. Many people who use violence themselves have experienced family violence, intergenerational trauma, child protection involvement, incarceration and other forms of disadvantage or adversity.³⁹ These experiences do not excuse violence nor diminish the harm experienced by victim-survivors. However, they highlight the importance of responses that address the underlying risk factors contributing to violence while maintaining a focus on accountability and victim-survivor safety.

The Second Action Plan should support Aboriginal and Torres Strait Islander-led responses that strengthen accountability, promote behaviour change and improve community safety. Consistent with the principles of self-determination and community control, these responses should be designed, delivered and evaluated in partnership with Aboriginal and Torres Strait Islander communities.

The Second Action Plan should prioritise:

³⁹ Our Watch. (2021). *Change the story: A shared framework for the primary prevention of violence against women in Australia* (2nd ed.). Our Watch; Malvaso, C. G., Day, A., & Casey, S. (2019). Young people who offend, maltreatment, and trauma: A developmental perspective. *Trauma, Violence, & Abuse*, 20(5), 738–749; Weatherburn, D., Cush, R., & Saunders, P. (2007). Screening for risk of further violence among Aboriginal and Torres Strait Islander offenders. *Crime and Justice Bulletin*, 107, 1–16.

- (a) ensuring accountability remains victim-survivor centred;
- (b) supporting earlier intervention and behaviour change; and
- (c) building the evidence base for Aboriginal and Torres Strait Islander-led responses to people who use violence.

6.1 Accountability must remain victim-centred

Responses to people who use violence should never come at the expense of victim-survivor safety. Victim-survivor safety, wellbeing, and access to justice remain the primary consideration in all responses to people who use violence. Efforts to support behaviour change should strengthen accountability for violence, not reduce it. Investment in responses for people who use violence should not come at the expense of legal assistance, advocacy, safety planning and other supports for victim-survivors.

Aboriginal and Torres Strait Islander communities have consistently recognised that accountability and healing are not competing objectives. Sustainable behaviour change is more likely when individuals are supported to understand the impacts of their behaviour, take accountability for their actions and engage with culturally safe supports that strengthen identity, relationships and community connection.⁴⁰

Accountability cannot be reduced to punishment alone. Without effective accountability responses, victim-survivors remain at risk of repeat victimisation and communities continue to bear the social, economic and cultural costs of ongoing violence. While legal consequences play a critical role, long-term reductions in violence require responses that support people who use violence to recognise the harm they have caused, take responsibility for their behaviour and actively work to prevent future violence.⁴¹ Responses that focus solely on punishment may do little to address the factors contributing to violence or reduce the likelihood of future harm.

The Second Action Plan should support Aboriginal and Torres Strait Islander-led approaches that maintain a clear focus on victim-survivor safety while strengthening accountability, behaviour change and community safety.

RECOMMENDATIONS

- Ensure victim-survivor safety remains the primary consideration in all responses to people who use violence
- Invest in Aboriginal and Torres Strait Islander-led responses that promote accountability, behaviour change and community safety, including supporting communities to design, deliver and evaluate culturally grounded approaches.

⁴⁰ Day, A., Chung, D., O'Leary, P., & Carson, E. (2009). Programs for men who perpetrate domestic violence: An examination of the issues underlying the effectiveness of intervention programs. *Journal of Family Violence*, 24(3), 203–212.

⁴¹ Ibid.

6.2 Supporting earlier intervention and behaviour change

By the time violence reaches crisis intervention point, significant harm has often already occurred. Earlier intervention is critical to preventing violence, strengthening community safety and reducing future contact with child protection and justice systems.⁴²

Violence is often the end point of multiple unmet needs and unaddressed harms. Exposure to family violence, childhood trauma, child protection involvement, racism, incarceration, alcohol and other drug use and poor social and emotional wellbeing can all increase vulnerability to future use of violence.⁴³ These factors do not excuse violence. However, they demonstrate why governments cannot rely solely on crisis responses and criminal justice interventions if they are serious about reducing violence over the long-term.

Aboriginal and Torres Strait Islander communities are often best placed to identify emerging risks, strengthen protective factors and support behaviour change before violence escalates. Earlier access to culturally safe supports, social and emotional wellbeing initiatives, mentoring, cultural strengthening programs and community-led interventions can address risk factors associated with violence while strengthening healthy relationships, cultural identity and community wellbeing.

Effective early intervention requires more than referral to a behaviour change program after violence has occurred. It requires sustained investment in approaches that strengthen protective factors, support emotional regulation, promote healthy relationships and address the underlying drivers of violence before harm occurs.

Governments cannot continue to invest predominantly in responding to the consequences of violence while underinvesting in opportunities to prevent it. Prevention and early intervention must form part of any long-term approach to reducing violence. The costs of failing to intervene early are significant, increasing demand on child protection, health, housing and justice systems while exposing more victim-survivors and children to harm. The Second Action Plan should support Aboriginal and Torres Strait Islander-led initiatives that intervene early, strengthen accountability and support meaningful behaviour change.

⁴² SNAICC – National Voice for our Children. (2023). *The Family Matters Report 2023*. SNAICC; Productivity Commission. (2024). *Review of the National Agreement on Closing the Gap*. Commonwealth of Australia.

⁴³ Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS), & VicHealth. (2018). *Changing the picture: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*. Our Watch; Malvaso, C. G., Day, A., & Casey, S. (2019). Young people who offend, maltreatment, and trauma: A developmental perspective. *Trauma, Violence, & Abuse*, 20(5), 738–749.

RECOMMENDATIONS

- Increase investment in Aboriginal and Torres Strait Islander-led prevention and early intervention initiatives that address the underlying drivers of violence before harm occurs
- Expand access to culturally safe social and emotional wellbeing, mentoring, cultural strengthening and community-led programs that support behaviour change and strengthen community safety
- Support Aboriginal and Torres Strait Islander communities to design, deliver and evaluate locally led initiatives that identify risks early, strengthen protective factors and prevent violence from becoming entrenched

6.3 Building the evidence base for Aboriginal and Torres Strait Islander-led interventions

Governments frequently call for evidence-based responses to people who use violence. Yet, Aboriginal and Torres Strait Islander-led initiatives are often expected to demonstrate evidence of effectiveness without receiving the long-term investment required to generate that evidence. This creates a policy failure in which governments continue funding what has been evaluated rather than what is most likely to work.

The existing evidence gap does not reflect a lack of expertise, innovation or promising practice within Aboriginal and Torres Strait Islander communities for responding to people who use violence. Rather, it reflects longstanding underinvestment in Aboriginal and Torres Strait Islander-led program design, delivery, evaluation and evidence-building.⁴⁴ As a result, governments continue to rely heavily on evidence generated through mainstream interventions while comparatively little evidence exists regarding culturally grounded approaches developed by Aboriginal and Torres Strait Islander communities.⁴⁵

Aboriginal and Torres Strait Islander-led initiatives are often expected to demonstrate evidence of effectiveness before receiving investment, yet many initiatives have never received the long-term funding required to generate that evidence. This creates a cycle in which Aboriginal and Torres Strait Islander-led programs struggle to secure funding because they have not been evaluated while lacking the resources necessary to undertake robust evaluation.

⁴⁴ Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. Australia's National Research Organisation for Women's Safety (ANROWS); Dudgeon, P., Milroy, H., Calma, T., Luxford, Y., Ring, I., Walker, R., Cox, A., Georgatos, G., & Holland, C. (2017). *Solutions that work: What the evidence and our people tell us*. Aboriginal and Torres Strait Islander Suicide Prevention Evaluation Project.

⁴⁵ Blagg, H., Williams, E., Cummings, E., Hovane, V., & Torres, M. (2018). *Innovative models in addressing violence against Indigenous women: Final report*. Australia's National Research Organisation for Women's Safety (ANROWS).

Building the evidence base for what works in responding to people who use violence requires more than funding evaluation activities. It requires investment in culturally informed evaluation frameworks that reflect Aboriginal and Torres Strait Islander concepts of wellbeing, healing, accountability and community safety. Mainstream evaluation approaches may not always capture the outcomes that communities identify as meaningful, including strengthened cultural identity, improved relationships, increased engagement with support services and enhanced community wellbeing.

Breaking this cycle requires sustained investment in Aboriginal and Torres Strait Islander-led research, evaluation and evidence-building. Without a stronger evidence base, governments will continue to make policy and funding decisions without a clear understanding of what works for Aboriginal and Torres Strait Islander communities. This creates a risk that investment is directed towards interventions that are easier to evaluate rather than those most likely to improve safety outcomes.

The Second Action Plan should invest in Aboriginal and Torres Strait Islander-led research, evaluation and evidence-building as a core reform priority. Governments cannot make evidence-based decisions while continuing to underinvest in the evidence base.

RECOMMENDATIONS

- Commit to long-term investment in Aboriginal and Torres Strait Islander-led research, evaluation and evidence-building, supported by culturally informed evaluation frameworks.

7. From commitment to implementation: embedding accountability for the Second Action Plan

Many of the reforms identified throughout QIFVLS' submission are not new. Aboriginal and Torres Strait Islander communities have consistently called for greater investment in community-controlled organisations, culturally safe service systems, workforce development, healing-informed responses and shared decision-making. These priorities are already reflected across the National Plan, Our Ways and Closing the Gap.

The success of the Second Action Plan will depend on whether governments can translate the committed actions into measurable improvements in safety and wellbeing for Aboriginal and Torres Strait Islander women, children, families and communities. Without clear accountability mechanisms, there is a risk that commitments to self-determination, community control and Closing the Gap remain aspirational rather than operational.



REFORM OPPORTUNITY: Accountability and shared decision-making under the Second Action Plan

Closing the Gap recognises that governments achieve better outcomes when Aboriginal and Torres Strait Islander peoples are genuine partners in the design, delivery and evaluation of policies and programs that affect their communities. Consistent with this approach, accountability mechanisms under the Second Action Plan should extend beyond reporting on activities undertaken and focus on whether reforms are improving outcomes for Aboriginal and Torres Strait Islander women, children, families and communities. Strengthening accountability will support implementation, build trust and ensure governments remain focused on achieving the objectives of the National Plan.

QIFVLS calls for the implementation of the Second Action Plan to:

- require public reporting on progress against actions affecting Aboriginal and Torres Strait Islander peoples;
- demonstrate how Aboriginal and Torres Strait Islander advice has informed implementation, monitoring and evaluation;
- embed Aboriginal and Torres Strait Islander representation within governance, oversight and decision-making structures;
- align monitoring and reporting with the Closing the Gap Priority Reforms and Target 13; and
- measure success through outcomes for Aboriginal and Torres Strait Islander women, children, families and communities rather than service outputs alone.

Ultimately, Aboriginal and Torres Strait Islander communities should not have to wait for another action plan to see commitments translated into action. Our communities have repeatedly identified what works. The challenge now is whether governments are prepared to listen, invest and act.