

Submission to National Plan to End Violence Against Women and Children Second Action Plan

August 2026

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Acknowledgement

SNAICC shows respect by acknowledging the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities. SNAICC pays respects to Elders past and present and we acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted. SNAICC's head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally.

About SNAICC

SNAICC is the national non-government peak body for Aboriginal and Torres Strait Islander children. Our work is concentrated on the fulfilment of the rights of our children, to ensure their safety, development, and well-being. At the heart of SNAICC's work is championing the principles of community control and self-determination as the means for sustained improvements for children and families – whether in child protection and wellbeing or early childhood education and development. SNAICC has a dynamic membership of Aboriginal and Torres Strait Islander community-based child care agencies, Multi-functional Aboriginal Children's Services, crèches, long day care child care services, pre-schools, Aboriginal schools, early childhood education services, early childhood support organisations, family support services, foster care agencies, family reunification services, family group homes, services for young people at risk, community groups and voluntary associations, government agencies and individual supporters.

As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences, needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations. SNAICC's work in the Child and Family Wellbeing sector is critical in transforming Australia's systems to better foster strong, healthy, thriving Aboriginal and Torres Strait Islander children who are connected to family and culture and part of self-determining communities. We also endorse the importance of family, community, culture and country in child and family welfare policy, legislation and practice. Our work comprises policy, advocacy, and sector development. We work with non-Indigenous services alongside Federal, State and Territory Governments to improve how agencies design and deliver supports and services for Aboriginal and Torres Strait Islander children and families.

Executive Summary

SNAICC welcomes the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence Against Women and Children. We note that this plan is being developed at the same time as a number of other national action plans that aim to reduce violence and harm to children and increase supports to families, providing a unique opportunity to develop action plans that are complementary and mutually reinforcing of priorities for our children.

Aboriginal and Torres Strait Islander children experience disproportionately high levels of and exposure to family, domestic and sexual violence, child protection intervention, intergenerational trauma, and systemic disadvantage. These experiences result from historic and continuing discrimination, racism, disempowerment and over-surveillance. They increase the risk of child removal and vulnerability to homelessness, mental health issues and trauma, disconnection from education, and creates barriers to disclosure, healing and justice.

SNAICC believes the following are key to making progress in reducing violence under the Second Action Plan:

- Aboriginal Community-Controlled Organisations (ACCOs) must be recognised as primary partners in prevention, early intervention, healing and victim-survivor support.
- The Second Action Plan must embed Aboriginal and Torres Strait Islander self-determination as a core prevention strategy.
- Mainstream services must be culturally safe and available for Aboriginal and Torres Strait Islander children and families.
- Children and young people must be recognised as survivors in their own right, not secondary to women's experience of violence or as witnesses.
- Lasting progress cannot be made without good data and evaluation, grounded in Indigenous Data Sovereignty principles.

The Second Action Plan must align with and reinforce the other action and implementation plans currently being developed to support children and families and prevent harm:

- Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence. (First Action Plan)
- Safe and Supported: The National Framework for Protecting Australia's Children 2021–2031. (Second Action Plan and Second Aboriginal and Torres Strait Islander Action Plan)
- The National Child and Family Investment Strategy (Implementation Plans)
- the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030 (Second Action Plan)

Introduction

SNAICC welcomes the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence Against Women and Children (National Plan). SNAICC is committed to preventing family, domestic, and sexual violence (FDSV) through strengthening culture, family and community. Most of all, SNAICC is committed to keeping Aboriginal and Torres Strait Islander children safe from harm and promoting healing for those who have experienced and witnessed violence.

Reducing violence against Aboriginal and Torres Strait Islander women and children is a key priority for the National Plan. The development of Our Ways – Strong Ways – Our Voices allows for coordinated and focused effort on reducing violence against Aboriginal and Torres Strait Islander families while the National Plan prioritises system-wide reform and inclusive service provision. Alongside these plans, The National Agreement on Closing the Gap (National Agreement) provides additional policy levers of increased shared decision making and self-determination, transforming government systems and strengthening the ACCO sector to make progress in achieving *Outcome 13: Aboriginal and Torres Strait Islander families and households are safe*.

Despite efforts to improve systems and supports through the First Action Plan, Aboriginal and Torres Strait Islander women and children continue to experience disproportionate levels of violence and its impacts compared to non-Indigenous women and children. The Second Action Plan must better capitalise on the policy frameworks, intergovernmental commitments and sound evidence base to enable a concerted effort to address this over-representation.

Aboriginal and Torres Strait Islander children who are at risk of or experience violence have unique needs for responses and prevention strategies that promote their safety and wellbeing. The voices and lived experience of Aboriginal and Torres Strait Islander children and young people must be prioritised in developing and implementing the Second Action Plan. The focus of FDSV services on adults and the limited availability of Aboriginal and Torres Strait Islander community-controlled services restricts the responsiveness to the needs of Aboriginal and Torres Strait Islander children. It is important that there is a clear focus and visibility of responses to the unique needs of children across all action plans.

It is also critical that the understanding of need and priorities for children is informed by children and young people themselves. Children have internationally recognised human rights to participate in decisions and inform the policy setting that impact them. In line with these rights, the voices and lived experience of Aboriginal and Torres Strait Islander children and young people must be prioritised in developing and implementing the Second Action Plan.

The Second Action Plan must also acknowledge and respond to the fact that Aboriginal and Torres Strait Islander children's experience of violence flows from intergenerational trauma and system failures that have had broad impacts on the social and economic factors that impact safety for children. Addressing violence requires holistic responses that address risk factors and promote the social determinants of wellbeing for children. As such, FDSV can only be addressed in combination with efforts to:

- Strengthen families and communities.
- Improve housing security.
- Reduce poverty.
- Increase culturally safe access to holistic support services.
- Reduce child removal and child protection system contact.

Governments and communities must work together to ensure that responses to these issues are aligned to achieve sustainable improved outcomes across the board.

Self-Determination is Protective

Evidence consistently demonstrates that services designed and delivered by Aboriginal and Torres Strait Islander communities improve engagement, trust, disclosure and outcomes. Consistent with the National Agreement on Closing the Gap, SNAICC's Transformation Principles Framework and the National Child and Family Investment Strategy, the Second Action Plan must prioritise government investment in ACCOs and drive the transition of decision-making, funding and service delivery to the Aboriginal community-controlled sector. Where mainstream services continue to play a role, this must occur through respectful partnerships with ACCOs, ensuring Aboriginal and Torres Strait Islander children and families have access to holistic, culturally safe support wherever they live.

Prevalence

For Aboriginal and Torres Strait Islander children and families, FDSV is "a critical public health issue and a symptom of ongoing colonial violence" and the manifestation of generations of trauma (Yoorrook Justice Commission 2025) that affects every community in Australia. Overwhelmingly violence against Aboriginal and Torres Strait Islander women and children is perpetrated by men, and this includes both non-Indigenous and Aboriginal and Torres Strait Islander men (AIHW 2025). Aboriginal and Torres Strait Islander women are 27 times more likely to be hospitalised due to FDSV than non-Indigenous women (AIHW 2025).

To address Aboriginal women and children's experience of FDSV, reforms must address the gendered, systemic and individual drivers of violence. This includes everyday experiences of a lack of physical, emotional and cultural safety in interactions with individuals, organisations and systems that are common for Aboriginal and Torres Strait Islander people (Productivity Commission 2024c).

Impacts

The immediate and lifelong impacts of FDSV on Aboriginal and Torres Strait Islander children have been well established and include:

- child removal, including permanent removal from family, community and country.

- housing insecurity and homelessness.
- interrupted education and poor education outcomes.
- greater risk of becoming victims or perpetrators in adulthood.
- social, cognitive, and mental health impacts.
- early and continuing contact with the criminal justice system and incarceration.

Failure to adequately address the causes of FDSV and to provide intensive family supports have led to compounding intergenerational violence and criminalisation (Yoorrook Justice Commission 2023 and 2025).

Family domestic and sexual violence impact over-representation across tertiary systems

Direct or indirect exposure to FDSV is a primary driver of children entering child welfare systems. The fear and very real risk of child removal is a major deterrent for women reporting FDSV and seeking help, which has significant impacts on women and children's safety and wellbeing. FDSV is also a key driver of Aboriginal and Torres Strait Islander children's contact with the criminal justice system, leading to the 'crossover cohort' of children in OOHC and youth justice, and the so-called 'pipeline' from OOHC to youth justice and to adult prison. (Yoorrook Justice Commission 2023 and 2025, RCIADIC 1991, AHREOC 1997, ALRC 2018).

These impacts are compounded by significant gaps and limitations in available data about FDSV experienced by Aboriginal and Torres Strait Islander people, including children (ANROWS 2024). This lack of reliable, consistent data increases the invisibility of Aboriginal and Torres Strait Islander children in policy and program responses to FDSV and its impacts (Australian Senate 2024; Victorian Commission for Children Young People 2021 a and b).

Alignment with Our Ways – Strong Ways – Strong Voices

The Second Action Plan under the National Plan has an important role in strengthening and supporting work that will be done under the first action plan for Our Ways – Strong Ways – Our Voices.

This can be achieved by explicit alignment between the National Plan's four priorities:

- Prevention – stopping violence before it starts.
- Early intervention – helping early when people are at risk.
- Response – supporting people when violence happens.
- Recovery and healing – helping people heal and rebuild their lives.

and the five threads of Our Ways – Strong Ways – Our Voices:

- **centring Aboriginal and Torres Strait Islander voice, self-determination, and agency.** This gives the plan its direction, integrity, and cultural authority. This thread is based on respect for Indigenous peoples and their inherent human rights.

- **Aboriginal and Torres Strait Islander-led solutions.** These must be sustainably supported, built on strength and resilience, and grounded in safety and healing that responds to local contexts and cultures.
- **reforming institutions and systems that impact safety.** Justice, health, education, housing, disability support and advocacy, and child protection must be transformed, addressing systemic discrimination to become culturally safe, responsive, and accountable to community.
- **strengthening evidence, research, and the data ecosystem through Indigenous Data Sovereignty.** This ensures knowledge is gathered and used ethically, with Indigenous leadership guiding how data and research will inform reform, and how evidence systems will be grown by community to be rigorous and culturally grounded.
- **breaking cycles of harm through strengthened housing and financial security.** Without safe homes and economic stability, safety and healing cannot be sustained. Targeted reform must address economic disparities for women and gaps in access to safe, stable and affordable housing.

Prevention through culture, family and community

(National Plan priorities 1 and 2; Our Ways – Strong Ways – Our Voices threads 1 and 2)

The top priority for the Second Action Plan should be investment in culturally safe early intervention and prevention programs and services in every community. The Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP) has been agreed by all jurisdictions and provides a framework for child safety that prioritises connection to culture with a focus on prevention. In July 2026 a majority of Ministers for Children reaffirmed their commitment to the ATSCIPP, and its requirement for connection to community and culture to be recognised as central to the safety and wellbeing of Aboriginal and Torres Strait Islander children and young people. (DSS 2026) The Second Action Plan must reflect that commitment by reflecting and implementing the ATSICPP in actions and activities across the plan, particularly those concerned with prevention. Strong culture, connection to country, kinship and community leadership are protective factors that must be recognised explicitly. This is especially true for children who not only experience and witness violence but are at risk of being removed from their families, community and culture as a result.

Prevention supports require resourcing across the range of ACCO and mainstream services that respond to the drivers and impacts of violence, including broader family and social support services alongside specialist FDSV and legal responses. Strong culture, connection to country, kinship and community leadership are protective factors that must be recognised explicitly within the Second Action Plan. This is especially true for children who not only experience and witness violence but are at risk of being removed from their families, community and culture as a result. Children are often overlooked in the FDSV system and are supported as extensions of their parents, rather than victim survivors themselves. Early intervention and prevention for children is critical, requiring intentional investment and commitment by governments to support safer families and individuals.

Common practice in FDSV and child protection services reflects the lack of dedicated responses and supports available for children. Typically, where a child is recorded as a witness to violence, or as having been ‘exposed’ to it, the child does not hold a case in their own right, is not independently assessed, is not asked what they want to happen, and loses support when the adult’s case closes or in damaging circumstances, the child is removed from their family. Recognition of children as victim survivors in their own right is essential, but recognition alone will not change practice unless it is accompanied by a funded entitlement to independent assessment, an independent support person, and a say in the plans made about them.

Responses to FDSV grounded in community, culture and country are key at every stage including through increased community-led prevention and healing initiatives; addressing discriminatory justice and policing responses; providing trauma responsive supports for victim-survivors and ensuring accountability of perpetrators. Culturally safe responses should seek to ensure that the removal of children from mothers who are victim-survivors is a last resort and supports are put in place for children to be safely reunified when they are removed for reasons of violence (Yoorrook Justice Commission 2023 and 2025; Carlson et al. 2024; SNAICC 2017).

Recommendations

1. Increased investment in Aboriginal and Torres Strait Islander-led primary prevention and early intervention initiatives.
2. Expansion of culturally grounded parenting, family strengthening and early years programs across the country.
3. Investment in and support for Aboriginal and Torres Strait Islander led place-based community prevention strategies.
4. Establishment of a funded entitlement for children who are victim survivors to independent assessment, an independent support person, and participation in decisions.

Aboriginal and Torres Strait Islander Community-Controlled responses

(National Plan priorities 1, 2, 3 and 4; Our Ways – Strong Ways – Our Voices threads 1 and 2)

Strengthening Aboriginal and Torres Strait Islander community-controlled responses for children and young people affected by FDSV can be supported at a number of levels:

- System-wide transformation and transfer of responsibilities and funding from mainstream organisations.
- Increased direct investment in ACCOs to provide tailored, trauma-informed supports and healing for children and young people.

System change

SNAICC sees the new Children and Family Support (CaFS) program as an opportunity to work with government and the sector to transfer responsibilities and funding to ACCOs. Through progressing this opportunity throughout CaFS implementation, the Second Action Plan could showcase how to operationalise system transformation as envisaged by the National Agreement on Closing the Gap, Safe and Supported, and the National Child and Family Investment Strategy. SNAICC anticipates the role of the CaFS program in driving ACCO led family support and prevention approaches will likely be a key focus of *Safe and Supported* second action plans, providing a key alignment opportunity across plans.

In this context, CaFS implementation should reflect evidence-based priorities for the transition of services to ACCO leadership, including:

- ACCOs recognised and prioritised as preferred providers for Aboriginal and Torres Strait Islander children and families.
- reallocation of a proportion of the former FaC Activity funding to directly fund ACCOs in alignment with the level of need for Aboriginal and Torres Strait Islander children and families.
- long-term core operational funding to ensure sustainability and capacity for ACCOs to deliver.
- seed funding for ACCOs to undertake community-led design and build readiness to deliver
- community representation in funding decisions.
- mainstream organisations only receiving funding to deliver services to Aboriginal and Torres Strait Islander children and families where genuine partnerships and measurable transition arrangements exist.

Tailored, trauma-informed supports

There is an urgent need to increase the availability of programs and services led by the Aboriginal and Torres Strait Islander Community Controlled Sector to address the significant impacts of FDSV on children. Evidence describes the importance that services adopt a social and emotional wellbeing lens, that recognises and responds in therapeutic ways to the impacts of violence-related trauma on children (Freijah et al 2026; Morgan et al 2023; SNAICC 2025a). These programs are crucial to recovery for those who are affected by FDSV (Yoorrook Justice Commission 2023 and 2025; Australian Human Rights Commission 2020a and b).

Key aspects of children and young people's healing are tailored, trauma-informed supports coordinated through dedicated safety and healing plans, rather than having children and young peoples' supports as an aspect of the primary victim survivor's (the mother's) plan.

The Safe and Supported Aboriginal and Torres Strait Islander Outcomes Framework (DSS 2023) provides a useful roadmap to improve ACCO-led solutions across the sector for Aboriginal and Torres Strait Islander children and young people impacted by FDSV. The Framework outlines processes for ACCOs to develop culturally safe healing and therapeutic professional practice and services to address the impacts of FDSV on children and young people.

Aboriginal and Torres Strait Islander children and families are more likely to engage with trusted Aboriginal-controlled services than mainstream systems. ACCOs and their workforce should be prioritised for investment to deliver quality and culturally safe services to Aboriginal and Torres Strait Islander women and children. This is a key aspect of responding to violence across the service system.

Recommendation

5. Implementation of the Children and Family Support (CaFS) Program to drive system transformation by shifting responsibilities and funding to the Aboriginal community-controlled sector, aligned to commitments in the National Agreement on Closing the Gap, Safe and Supported and the National Child and Family Investment Strategy.
6. Increased investment in ACCO-developed programs to support healing for Aboriginal and Torres Strait Islander children and young people.

Service access can be increased by using hub models where frequently used services are co-located and operate on mutual referral terms (Sydenham et al 2026). Integrated multidisciplinary service models have been successfully supporting families across the early childhood, maternal and child health, education and employment sectors. Most recently the Metcalfe report (2024) recommended the development and resourcing of multi-functional service hubs for separating or separated First Nations families, delivered by ACCOs.

While multiservice hubs have been implemented in five communities in Western Australia under the First Action Plan (DSS 2025), there needs to be a national approach to providing service choice and access to all Aboriginal and Torres Strait Islander women, children and families. These hubs should provide multidisciplinary services across the continuum of prevention, early intervention and emergency response to FDSV.

Recommendation

7. Establishment and resourcing of ACCO delivered culturally safe, multidisciplinary family relationship service hubs for Aboriginal and Torres Strait Islander families to increase access to holistic services, aligned to recommendation 8 of the Metcalf Review of the Family Relationship Services Program (2024).

Agency of Aboriginal and Torres Strait Islander children and young people

(National Plan priorities 1, 2, 3 and 4; Our Ways – Strong Ways – Our Voices threads 1 and 3)

SNAICC's Youth Voice

Across 2025, SNAICC undertook a national engagement process to inform the design of a national Aboriginal and Torres Strait Islander Youth Voice mechanism. SNAICC heard directly from more than 150 people, the majority of whom were Aboriginal and Torres Strait Islander community members, children and young people, including from over 45 ACCOs and other NGOs across 13 locations in remote, regional and urban Australia. There were also online meetings and submissions which were considered in the development of this work (SNAICC 2026).

From that national engagement, there is now a functioning SNAICC Youth Voice mechanism, which sits alongside and within long-standing community-led structures, that have been convening and supporting the views and rights young Aboriginal and Torres Strait Islander peoples for years. Governments must fund and use what the community-controlled sector has already built to ensure youth voices inform and drive implementation of the Action Plan.

Voices of children and young people matter

All children have a right to be involved in decisions that affect their lives. For Aboriginal and Torres Strait Islander children and young people, that right is also collective, connected to culture, Community, kinship and Country.

Aboriginal and Torres Strait Islander children and young people are among those most affected by FDSV, and among those least present in the decisions made about it. Children and young people appear in the data, in the impact statements and in the language of beneficiaries, but not in the rooms where measures are designed, funded, monitored or evaluated. This is the participation gap the Second Action Plan has an opportunity to close by taking genuine steps including fund share-decision-making, recognise self-determination, and create fairer and more just opportunities for the lives of these children and young people to develop and contribute meaningfully within society.

The children most harmed are the least likely to be reached

A genuine response must reach beyond children and young people already engaged through services and ongoing engagement structures.

'Focus on reaching those who've been failed by the system – not just those with positive service experiences.' – Mounty Aboriginal Youth and Community Services, Sydney (New South Wales) (SNAICC 2026)

The Aboriginal and Torres Strait Islander children and young people most seriously affected by FDSV are also those least likely to be reached by consultation. They are in out-of-home care, in youth detention, in refuges and homelessness services, in kinship placements, and in communities where there are limited to no specialist services through which their views can be properly considered and actioned.

These are precisely the children whose experience of violence, and of the systems that responded to it, that the Second Action Plan most needs to understand.

Case study: Ngaga-dji – engaging the children the system has failed

In 2018 the Koorie Youth Council published *Ngaga-dji* ('hear me'), a youth-led and Aboriginal-led research project that gathered the stories of 42 Aboriginal and Torres Strait Islander children and young people in Victoria's youth justice system through yarning circles and individual interviews. The report was explicitly framed as amplifying the voices of children 'that society silences with incarceration and stigma' (Koorie Youth Council 2018).

Ngaga-dji used community-designed yarning circles rather than survey instruments; de-identified composite accounts reviewed by a young people's focus group before

publication; and solutions authored by young people and grounded in self-determination, rather than extracted from them and interpreted by adults. It demonstrates that children inside statutory systems can be engaged safely, ethically and in depth, particularly when conducted through the lens of Aboriginal ways of knowing, doing and being.

Ngaga-dji is a model the Second Action Plan can fund and adapt for children and young people affected by FDSV, but this must be delivered and designed by Aboriginal and Torres Strait Islander peoples. To do this well, this means translating policy into practice, with shared decision-making principles and approaches embedded.

Safe participation is the institution's responsibility, not the child's responsibility

Engaging children about FDSV carries risks that do not attach to other policy topics. A child asked about violence in their home is speaking to a system that holds the power to remove them or their siblings. Mandatory reporting obligations sit behind every conversation and are rarely explained to a child in advance.

For the Second Action Plan, this means engagement with children must be designed with:

- a clear advance explanation of what will happen to what a child says and what must be reported.
- the option to contribute without identifying themselves or their family.
- an independent support person who is not the reporting agency.
- ACCO delivery.
- cultural and psychological support during and after.

These are design requirements, not optional enhancements, and they should be funded as part of any engagement measure. These voices and perspectives are essential to meet the needs of children and young people.

Consultation without transformative action is itself a harm

Young people were direct that being asked to give an account of their life and then never being told what changed is itself a harm (SNAICC, 2026). Young Aboriginal and Torres Strait Islander people are repeatedly asked to recount experiences of violence, removal and racism in consultations, inquiries, research and media interviews, frequently without transformative action following.

Cory et al (2024), building on the Koorie Youth Council's Wayipunga framework (2022), propose five requirements for meaningful participation:

1. visibility
2. inclusion
3. acknowledgement of structural and relationship power dynamics
4. free, prior and informed consent
5. a genuine shift of power.

Engagement with children and young people under the Second Action Plan should be tested against these established Aboriginal and Torres Strait Islander-led standards. Young

people are not asking only for truth-telling. They are asking for truth-listening that leads to transformative action.

Resourcing participation

Participation of this quality cannot be delivered from within existing peak body core funding.

SNAICC currently sustains the Youth Voice from organisational core funds on a small operational footprint. Extending that participation to the scale and duration of not just the requirements of this Second Action Plan requires, but also the development of the first action plan under Our Ways – Strong Ways – Our Voice across all matters impacting children and young people's lives, must be properly resourced.

For these plans – design input, implementation advice, and a continuing role through monitoring and evaluation across the life of the plans – requires dedicated Commonwealth resourcing, committed at the outset rather than deferred to later phases, including the implementation phase.

Recommendations

8. Funding a national Aboriginal and Torres Strait Islander children and young people's voice function, delivered by SNAICC in partnership with jurisdictional ACCO peaks and existing community-led youth structures.
9. Engaging with the National Aboriginal and Torres Strait Islander Commissioner for Children and Young People to support its core function to ensure the voices of children and young people are reflected in advice to government.
10. Developing a national children and young people engagement strategy under the Second Action Plan to inform implementation, monitoring and evaluation using established Aboriginal and Torres Strait Islander-led methods such as (but not limited to) the Ngaga-dji model and Wayipunga framework.

Strengthened whole of system responses

(National Plan priorities 1, 2, 3 and 4; Our Ways – Strong Ways – Our Voices threads 3 and 5)

The Second Action Plan must reiterate and implement the National Plan's commitment to improving and building capacity in mainstream government institutions, services and responses in line with Priority Reform Three of Closing the Gap, so that these are culturally safe and can better meet the needs of Aboriginal and Torres Strait Islander peoples and communities. The Productivity Commission and Coalition of Peaks reports into implementation of the National Agreement found that progress under Priority Reform Area Three had been slow. The Second Action Plan provides an opportunity to model system

change and transformation by following the principles set out in SNAICC's Transformation Principles Framework, and National Child and Family Investment Strategy.

Increased investment must also be made in ACCO-designed, developed and led training and development in cultural capability for mainstream services, such as expanding SNAICC's Waterways program. The Safe and Supported Aboriginal and Torres Strait Islander Outcomes Framework prioritises a non-Indigenous child and family workforce and sector that are more culturally responsive, trauma-aware and healing-informed.

Recommendations

11. Commitment to determined action on sector reform and transformation in line with Priority Reform Area Three of the National Agreement on Closing the Gap.
12. Establishing contracts and reporting obligations for mainstream organisations that require active, demonstrated effort to provide culturally safe services for Aboriginal and Torres Strait Islander people and communities.
13. Increased investment in ACCO-designed, developed and led training and development in cultural capability for mainstream services.

Data, research and evidence

(Our Ways – Strong Ways – Our Voices thread 4)

Since the National Agreement was signed in August 2020 there has been little progress in measuring progress in meeting Outcome 13. The baseline data measure of the 2018/19 NATSISS has not changed despite data measures for Outcome 13 being a priority in the Closing the Gap Data Development Plan 2022-2030. Data remains patchy and not comparable across jurisdictions. Currently much of what we know about our children's experience of violence is deduced from other data, usually mediated through their mothers' access to services: homelessness, child removal, education disruption, trauma and long-term mental health issues. The delay in developing agreed data measures undermines the safety of our children. There is an urgent need to develop appropriate, consistent headline data measures for Outcome 13 of Closing the Gap.

It is disappointing that so many data and evaluation activities under the First Action Plan and the Aboriginal and Torres Strait Islander Action Plan, are still in the planning stage (DSS 2025). Finlay et al (2026) have recently pointed to the lack of consistent evaluation across Aboriginal and Torres Strait Islander programs and projects, and the impact this has on the development of sound, evidence-based and community-relevant policy and practice. The Second Action Plan must prioritise coordinated evaluation combined with evidence-based policy and programs led by Aboriginal and Torres Strait Islander communities.

There have been extensive inquiries and research into the experiences of Aboriginal and Torres Strait Islander women and children impacted by violence with clear recommendations for reform. Efforts to reduce violence against our women and children

must take account of these, including the 2024 Senate Inquiry into Missing and murdered First Nations women and children, coroners' reports and the increasing body of academic research.

Children and young people are close to invisible in the current data. Almost all of what is known about their experience of FDSV is inferred from adult service contact, and no headline measure under Outcome 13 reports a child's own account of whether they are safe. Two gaps matter particularly for this Plan:

- there is no specific national data and reporting on the impact of family violence as a factor contributing to child removal
- there is no comparable national measure of harm to children while in out-of-home care
- there is no comprehensive data on whether children receive therapeutic response supports when they are identified as victim survivors of FDSV and
- there is no measure of children's and young people's own assessment of whether a service made them safer.

Recommendations

14. Developing appropriate, consistent baseline data measures for Outcome 13 as an urgent priority.
15. Disaggregation of relevant data by age band, Indigenous status, jurisdiction, remoteness and, where relevant, care status.
16. Establishing an evaluation framework for the Second Action Plan that is grounded in evidence and culturally and practically relevant for Aboriginal and Torres Strait Islander children and families. This should be developed in partnership with peaks and key ACCOs.
17. Developing a national measure of children's and young people's own reported experience of safety, developed with Aboriginal and Torres Strait Islander young people through the community-controlled sector.
18. Applying Indigenous Data Sovereignty and Indigenous Data Governance principles, as articulated by Maïam nayri Wingara, to all data collected about Aboriginal and Torres Strait Islander children under the Plan, including community determination of what is collected and how it is used.
19. Increasing investment in ACCOs to grow Aboriginal and Torres Strait Islander-led research, monitoring and evaluation.

Conclusion

SNAICC supports the continued implementation of the National Plan and welcomes the development of the Second Action Plan, in conjunction with the Our Ways – Strong Ways – Our Voices first Action Plan.

Meaningful progress for Aboriginal and Torres Strait Islander children requires a shift from crisis-driven responses toward self-determined prevention, culturally safe healing and Aboriginal and Torres Strait Islander community control. It is imperative that all Aboriginal and Torres Strait Islander women, children and families are able to access a full range of culturally safe services in their community.

The Second Action Plan must embed self-determination, invest in ACCOs and establish clear accountability mechanisms to ensure Aboriginal and Torres Strait Islander children grow up safe, connected to culture and free from violence.

SNAICC is committed to continuing work with all governments to ensure the safety and wellbeing of children. The Aboriginal and Torres Strait Islander Community Controlled sector are the experts in supporting our families. Investing in our sectors and communities offers the greatest hope for sustained positive change.

Closing the Gap starts with our children.

Recommendations

SNAICC recommends that the Second Action Plan includes:

1. Increased investment in Aboriginal and Torres Strait Islander-led primary prevention and early intervention initiatives.
2. Expansion of culturally grounded parenting, family strengthening and early years programs across the country.
3. Investment in and support for Aboriginal and Torres Strait Islander led place-based community prevention strategies.
4. Establishment of a funded entitlement for children who are victim survivors to independent assessment, an independent support person, and participation in decisions.
5. Implementation of the Children and Family Support (CaFS) Program to drive system transformation by shifting responsibilities and funding to the Aboriginal community-controlled sector, aligned to commitments in the National Agreement on Closing the Gap, Safe and Supported and the National Child and Family Investment Strategy.
6. Increased investment in ACCO-developed programs to support healing for Aboriginal and Torres Strait Islander children and young people.
7. Establishment and resourcing of ACCO delivered culturally safe, multidisciplinary family relationship service hubs for Aboriginal and Torres Strait Islander families to increase access to holistic services, aligned to recommendation 8 of the Metcalf Review of the Family Relationship Services Program (2024).
8. Funding a national Aboriginal and Torres Strait Islander children and young people's voice function, delivered by SNAICC in partnership with jurisdictional ACCO peaks and existing community-led youth structures.
9. Engaging with the National Aboriginal and Torres Strait Islander Commissioner for Children and Young People to support its core function to ensure the voices of children and young people are reflected in advice to government.

10. Developing a national children and young people engagement strategy under the Second Action Plan to inform implementation, monitoring and evaluation using established Aboriginal and Torres Strait Islander-led methods such as (but not limited to) the Ngaga-dji model and Wayipunga framework.
11. Commitment to determined action on sector reform and transformation in line with Priority Reform Area Three of the National Agreement on Closing the Gap.
12. Establishing contracts and reporting obligations for mainstream organisations that require active, demonstrated effort to provide culturally safe services for Aboriginal and Torres Strait Islander people and communities.
13. Increased investment in ACCO-designed, developed and led training and development in cultural capability for mainstream services.
14. Developing appropriate, consistent baseline data measures for Outcome 13 as an urgent priority.
15. Disaggregation of relevant data by age band, Indigenous status, jurisdiction, remoteness and, where relevant, care status.
16. Establishing an evaluation framework for the Second Action Plan that is grounded in evidence and culturally and practically relevant for Aboriginal and Torres Strait Islander children and families. This should be developed in partnership with peaks and key ACCOs.
17. Developing a national measure of children's and young people's own reported experience of safety, developed with Aboriginal and Torres Strait Islander young people through the community-controlled sector.
18. Applying Indigenous Data Sovereignty and Indigenous Data Governance principles, as articulated by Maïam nayri Wingara, to all data collected about Aboriginal and Torres Strait Islander children under the Plan, including community determination of what is collected and how it is used.
19. Increasing investment in ACCOs to grow Aboriginal and Torres Strait Islander-led research, monitoring and evaluation.

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