

UNICEF Australia's submission to the Department of Social Services' Consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022–2032)

Introduction

UNICEF Australia welcomes the opportunity to contribute to the consultation to inform the Second Action Plan under the *National Plan to End Violence against Women and Children 2022–2032* and related frameworks, including *Safe and Supported, Our Ways – Strong Ways – Our Voices* and the *National Strategy to Prevent and Respond to Child Sexual Abuse*.

UNICEF Australia brings a global child-focused perspective on preventing violence against children and young people, promoting their wellbeing and strengthening support systems. Our perspective is guided by the United Nations Convention on the Rights of the Child (CRC) and informed by UNICEF's work in more than 190 countries.

We recognise the progress made under the First Action Plan, including increased investment in child-centred services and greater recognition of online abuse and grooming as forms of violence. However, violence against children remains widespread and evolving. The latest Australian Child Maltreatment Study found that 62.2% of Australians have experienced at least one form of maltreatment in childhood.ⁱ These findings are reinforced by the [*State of Australia's Children 2025*](#) report by ARACY and UNICEF Australia, which highlights rising mental health concerns, growing online risks, and ongoing systemic challenges for children involved in child protection and youth justice systems. Together, these trends underscore the need for stronger prevention, early intervention and recovery supports to protect children from violence and harm, and create the conditions for them to thrive.

Despite being at heightened risk of violence and requiring responses tailored to their developmental needs, there was only one child specific commitment in the First Action Plan (*Action 8 - Develop and implement age-appropriate, culturally safe programs across all four domains*). We welcome the consultation paper's identification of "Children and young people in their own right" as a priority area for the Second Action Plan. The opportunities identified – including strengthening participation, responding to emerging online harms, supporting earlier intervention, and working with children and young people who use violence – provide a strong foundation for action.

Achieving these objectives will also require greater recognition of the ways violence against children intersects with violence against women. There is a well-established evidence-base demonstrating the various ways violence against children and violence against women intersect, with compounding consequences for children's and women's health and wellbeing.ⁱⁱ For example, research indicates that children in homes with intimate partner violence are more likely to experience violent discipline by both female and male caregivers.ⁱⁱⁱ The trauma of exposure to violence in childhood can also cause physiological changes, which may contribute to poor impulse control or other problems that can increase later risks of violence.^{iv}

These intersections must be considered and addressed through coordinated responses to enable every child in Australia to grow up free from violence, abuse, neglect, exploitation and other harmful practices.

Informed by our global experience, UNICEF recently published a series of briefs exploring these intersections and their implications for policy and practice,^v including:

- [Why it matters for children's protection and well-being](#)
- [Parent and Caregiver Support Programmes](#)
- [Adolescent programming to prevent violence](#)

These resources could help inform implementation of the Second Action Plan, particularly in relation to child-centred prevention and early intervention.

More broadly, [INSPIRE: Seven strategies for Ending Violence Against Children](#) and the accompanying [Indicator Guidance and Results Framework](#), provides a practical framework for strengthening the child-focused prevention architecture of the National Plan and related plans, and measuring outcomes. Developed jointly by UNICEF, the World Health Organization, World Bank and Global Partnership to End Violence Against Children, *INSPIRE* provides a globally recognised, evidence-based approach to preventing and responding to violence against children through coordinated action across law and policy reform, social norms change, safe environments, family support, economic strengthening, response services, and education.

The Second Action Plan presents an opportunity to strengthen Australia's child safety architecture by more systematically embedding children's rights, voices and developmental needs across policy, service design, implementation and accountability mechanisms. UNICEF Australia stands ready to work with the Government to support greater alignment across national frameworks that contribute to the safety and wellbeing of all children and young people.

Summary of recommendations

We provide the following recommendations to inform the Second Action Plan and related frameworks:

1. *Embed the four core principles of the CRC - non-discrimination, the best interests of the child, the right to life, survival and development, and the right of children to be heard – across the design, implementation, monitoring and evaluation of the Second Action Plan and related frameworks.*
2. *Recognise birth registration and birth certificates as protective factors and invest in targeted measures to improve access for children and families facing the greatest barriers.*
3. *Prevent and respond to online harms for children through child rights-based digital reform across online safety, privacy, and AI, and invest in building the evidence base on online child exploitation.*
4. *Prioritise safe, adequately resourced and meaningful participation of children and young people in co-designing solutions and shaping the policies, programs and support services that affect them, using age-appropriate, accessible and inclusive communication and engagement.*
5. *Invest in child rights education and workforce capability so children can better recognise and seek help for violence, abuse and exploitation, and the professionals who work with them are equipped to uphold children's rights in practice.*
6. *Strengthen First Nations leadership, self-determination and community-controlled responses across prevention, early intervention, response, recovery and healing.*
7. *Promote developmentally and culturally appropriate approaches to preventing and responding to the use of violence by children and young people that are co-designed by children and young people with lived experience.*

8. *Establish national minimum standards for youth justice systems and eliminate harmful practices in detention, including solitary confinement, prolonged isolation and inappropriate use of restraints.*
9. *Strengthen nationally consistent data, monitoring and accountability mechanisms across interconnected child safety frameworks.*

While UNICEF Australia supports action across all these recommendations, this submission focuses in greater depth on birth registration, digital safety and meaningful participation – three areas where we have developed particular expertise. These are important components of child safety, with the potential to strengthen prevention, early intervention, protection, response and recovery across multiple national plans and strategies.

Recognising birth registration and certificates as protective factors

Birth registration and birth certificates are a foundational child protection measure. They ensure children are visible in official systems, accounted for in government planning, and able to access early learning, education, specialised healthcare and support services that help keep them safe and thriving. They can also help ensure children do not fall through the cracks when it comes to detecting and responding to child maltreatment and disadvantage.

National data shows that around 12,600 births go unregistered in Australia each year, with delays disproportionately affecting children in remote communities, areas of socio-economic disadvantage, First Nations children, and babies born to mothers under the age of 25.^{vi} Despite important progress, barriers to registration and certification, such as cost, administrative complexity and identity requirements, persist.

A lack of birth registration or a birth certificate can be both a consequence and an enabler of child exploitation, trafficking, child labour and child marriage.^{vii} It can also create barriers for children leaving situations of abuse, neglect, exploitation and other harm, and for victim-survivors seeking support and recovery.

If left unaddressed, a lack of birth certificate can also reinforce intergenerational disadvantage. In a study conducted by UNICEF Australia, 35% of parents identified a lack of identity documents as a barrier to registering their child's birth, including 10% who did not have a birth certificate themselves.^{viii} Community consultations highlighted additional challenges for mothers experiencing domestic and family violence or unstable housing, where identity documents had been lost, withheld or were unsafe to access.

A young mother of five we interviewed described the birth registration process as confusing and heavily reliant on online systems that did not work for her. Without her children's birth certificates, she struggled to:

- Enrol her children in early learning and school;
- Maintain Centrelink payments;
- Apply for NDIS support for one child with additional needs; and
- Provide required identification for social housing.

These findings demonstrate the need to simplify birth registration processes and remove financial and practical barriers to obtaining birth certificates, ensuring that children and families facing the greatest risks are not excluded from accessing timely support.

Our report [Certify Hope: The Social Return on Birth Registration](#), developed with Social Ventures Australia, sets out a practical roadmap for reform. This reform includes free first birth certificates, increased community outreach, simpler registration processes and enhanced systems integration. Our analysis shows that an \$11 million investment in free first birth certificates and targeted outreach for families facing the greatest barriers could generate approximately \$67 million in social and economic returns over children's lifetimes – a return of \$6.10 for every dollar invested.

A birth certificate is a child's passport to protection. It should therefore be recognised as a foundational element of Australia's child safety architecture and elevated as a national priority. The Second Action Plan and related frameworks can support this by recognising birth registration and certificates as protective factors and investing in targeted measures to improve access for children and families facing the greatest barriers.

Preventing and responding to harms in children's online environments

The distinction between the offline and online worlds has never been more blurry, particularly for so many issues concerning the protection of children from violence, exploitation and abuse. We see this when we learn of horrific sexual abuse in childcare settings because an offender is caught distributing exploitation material online. We see this when a student in secondary school shares an AI-generated intimate image of a classmate to hundreds of their peers. And every time an image of a child is uploaded online, some level of privacy risk is introduced.

Because of this, our child protection and family violence reforms cannot be made in isolation of broader digital reforms either underway or on the horizon in Australia. From online safety to privacy to AI, there are several priority areas for action which should help address harm to children wherever it occurs, including in online environments. There also remains a need to build the evidence base on how online harm occurs across Australia, so we can better respond to it. To this end, we offer several recommendations:

- **Legislating a digital duty of care** – Our current online safety frameworks are reflective of a “notice and takedown” approach. The focus is on harmful content which we identify and then remove, after harm has occurred. But we need to respond to harm *before* it occurs and a digital duty of care will go some way to addressing this. Through this approach, tech companies would be compelled to consider the safety of children at all stages of the lifecycle of platform development. From design to testing to eventual roll-out to millions of Australian children, companies would need to consider how their platform impacts the safety of children, identifying risk and then developing and implementing appropriate mitigations. The Australian Government has already committed to legislating a digital duty of care. Progressing it with urgency will be crucial to provide stronger protections for children in digital environments;
- **Progressing privacy reform** – Online safety and privacy are inseparable. Every piece of data, information or content that relates to a child online carries some level of risk. Our privacy laws govern how this data is collected and used, and they are in great need of updating. The

Government is already progressing the creation of a Children's Online Privacy Code which should become law by late 2026. It will need to be backed with appropriate resourcing to ensure it is effectively implemented and delivers on its promise to provide greater protection for children's data;

- **Responding to AI-related risks** – UNICEF Australia's research paper [Algorithmic Kids](#) found that Generative AI (GenAI) is rapidly changing childhood in Australia. Children are using GenAI to alter or create illicit images and videos, often of their peers. AI companions and chatbots designed for adults are also being used by children with a lack of safeguards putting developmentally vulnerable children at risk. And most concerning, GenAI tools are being used to alter or create illegal child exploitation and abuse material. In response to this, we need to utilise existing digital reforms in Australia (like duty of care and privacy reform) to make them fit-for-purpose for AI, then plug any gaps with new laws and regulations. An immediate example is updating Australia's commonwealth criminal codes to ensure they're responsive to AI-related harms; and
- **Building the evidence base** – Online child sexual exploitation and abuse is one of the greatest emerging threats to child protection. And while an evidence base is growing in Australia, a more complete picture of how this issue manifests is needed to strengthen our response. UNICEF's [Disrupting Harm](#) project provides exactly this. Disrupting Harm conducts multi-sectoral, multi-method national-level research to determine children's exposure to online sexual exploitation and abuse and the capacity of law enforcement, the social service workforce, and judiciary to respond to these crimes. By conducting a Disrupting Harm national assessment, Australia would be the first high-income country in the world to do in-depth research on online child sexual abuse that will significantly aid the government's capacity to prevent and respond to this crime.

Embedding children's voices in decision-making

The consultation paper's recognition of "*Children and young people in their own right*" as a priority area should be reflected not only in the content of the Second Action Plan, but also in how it is designed, implemented and evaluated. Consistent with Article 12 of the CRC, the Second Action Plan should embed safe, inclusive and meaningful participation across policy development, service design, implementation, monitoring and evaluation.

This includes ongoing co-design processes, child and youth advisory mechanisms, participatory evaluation, and transparent feedback loops demonstrating how children's views have informed decisions. Particular effort should be made to engage children and young people who are often excluded from decision-making processes, including Aboriginal and Torres Strait Islander children, children with disabilities, children in out-of-home care, and children with lived experience of violence and abuse. To support meaningful participation, engagement processes involving children and young people should be:

- transparent and informed;
- voluntary;
- respectful;
- inclusive and non-discriminatory;
- child-safe and risk-aware;
- culturally appropriate;
- supported by appropriate training and resources; and
- accountable.

Appropriate safeguarding, accessibility supports, remuneration and trauma-informed approaches should be integrated into all participation activities to ensure engagement is both meaningful and safe. UNICEF's [Guidance on Child and Adolescent Participation](#) provides practical insights for implementing these principles and embedding children's voices in the design, delivery and evaluation of policies and programs.

Thank you again for the opportunity to contribute to this important reform, which should help strengthen our child safety architecture and provide greater protection for Australia's children.



ⁱ Mathews, Ben, [The Australian Child Maltreatment Study: National prevalence and associated health outcomes of child abuse and neglect](#), *Journal of the Australian Medical Association*, 218(6), 2023.

ⁱⁱ Guedes, Alessandra, *et al.*, 'Bridging the Gaps: A global review of intersections of violence against women and violence against children', *Global Health Action*, vol. 9, no. 1, 2016, 31516; UNICEF, [Gender Dimensions of Violence Against Children and Adolescents](#), accessed July 2026.

ⁱⁱⁱ See, e.g. Pearson, Isabelle, *et al.*, 'The Co-Occurrence of Intimate Partner Violence and Violence Against Children: A systematic review on associated factors in low- and middle-income countries', *Trauma Violence Abuse*, vol. 24, no. 4, 2023, pp. 2097–2114.

^{iv} Sijtsema, Jelle J., Elena A. Stolz and Stefan Bogaerts, 'Unique Risk Factors of the Co-Occurrence Between Child Maltreatment and Intimate Partner Violence Perpetration', *European Psychologist*, vol. 25, 2020, pp. 122–133.

^v UNICEF, [Working at the Intersections of Violence Against Children and Violence Against Women](#), accessed July 2026.

^{vi} UNICEF Australia, [Certify Hope: Rights from the start](#), 2024.

^{vii} See e.g., UNICEF USA, [Birth Registration Essential for the Protection of Children's Rights Everywhere](#), accessed 27 July 2026; Anti-slavery, [How birth registration can support a life of freedom](#), 2 June 2026; Asadisarvestani K. 'Structural, economic, and socio-cultural barriers to birth and death registration in Iran: a qualitative study', *International Journal for Equity in Health*. 2025 Dec 20;25(1):25. doi: 10.1186/s12939-025-02744-4. PMID: 41422034; PMCID: PMC12837044.

^{viii} UNICEF Australia, [Certify Hope: The Social Return on Birth Registration](#), 2026, p.13.