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Ms Sam Byng
First Assistant Secretary
Children and Families Division
Justice and Communities Group
Attorney-General's Department

By email: samantha.byng@ag.gov.au

Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*

Thank you for the opportunity to contribute to the consultations about the Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030* (the CSA SAP), and to provide these comments after the closing date for submissions.

Relationships Australia recently provided a comprehensive submission about the Second Action Plan under the *National Plan to End Violence Against Women and Children 2022-2032*, which is available on our website at <https://www.relationships.org.au/research/#advocacy>. We have also recently made a submission to the National Redress Scheme Eighth Anniversary Review (which is also on our website). This letter is meant to complement those submissions, with a narrow focus on some particular aspects of the Public Consultation Paper about the CSA SAP.

Relationships Australia provides services to adult and child victim-survivors of child sexual abuse, both through specialised programs such as the Redress Support Services, and more general programs supporting individuals and families.

Recommendations

Recommendation 1 That the CSA SAP prioritise the next phase of the Australian Child Maltreatment Study, including by committing Australian governments to ongoing funding for the Study.

Recommendation 2 That the CSA SAP support greater integration with frameworks, strategies and plans to prevent and respond to other kinds of child maltreatment, under the umbrella of *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031* (Safe and Supported), including with:

- public awareness and education campaigns to promote a shared understanding of what constitutes each sub-type of child maltreatment, and
- service responses that take a lifecourse approach to relational wellbeing.

Recommendation 3 The CSA SAP should recognise that children and adolescents who are exposed to abuse and mistreatment of older family members are, by virtue of that exposure, experiencing one of the recognised sub-types of child maltreatment (ie exposure to DFV).

Recommendation 4 The CSA SAP should:

- be underpinned by a whole of lifecourse approach to understanding the experience of DFSV (including compounding harms) as well as risk and protective factors for experiencing and using DFSV
- adopt a wraparound, multi-disciplinary ‘whole of family’ approach, which sees and responds to victim survivors not as isolated individuals, but within their family (past and present), community and cultural contexts, and which lifts the burdens of fragmentation from victim survivors, and users, of child sexual abuse
- take a universal, population-level approach to primary prevention of CSA
- promote collaboration among services, supported by appropriate funding envelopes (rather than relying on the discretionary time, effort and goodwill of already over-worked and under-remunerated staff), and
- drive improved collaboration among jurisdictions, so that no child is disadvantaged in terms of service (including justice) responses because of where they are located.

Recommendation 5 The CSA SAP should include a tailored set of measures to prevent and respond to child sexual abuse occurring in out of home care.

Recommendation 6 The CSA SAP should include a tailored set of measures to enhance the supports available for non-offending partners and other family members of victim survivors of child sexual abuse.

Recommendation 7 The CSA SAP should centre the voices of children and young people as intrinsic to effective service design, delivery and evaluation.

Recommendation 8 The CSA SAP should support universal risk screening for children, using a validated tool such as DOORS for Kids.

Recommendation 9 The CSA SAP should extend the *National Strategic Framework for Information Sharing between the Family Law and Family Violence and Child Protection Systems* (the Information Sharing Framework)¹ to prescribe Children’s Contact Services, Family Dispute Resolution services, and post-separation parenting programme providers, as Authorised Information Sharing Entities.

Comments on Public Consultation Paper

Research

The Australian Child Maltreatment Study has been of incalculable value in improving knowledge and understanding of the nature and prevalence of CSA, as well as of the other sub-types of child maltreatment. To support understanding of the impact of measures undertaken under the National Strategy, and build on the findings of the first phase, we recommend that the CSA

¹ National Strategic Framework for Information Sharing between the Family Law and Family Violence and Child Protection Systems. Accessible at <https://www.ag.gov.au/families-and-marriage/publications/national-strategic-framework-information-sharing-between-family-law-and-family-violence-and-child-protection-systems>

SAP prioritise the next phase of the Australian Child Maltreatment Study, including by committing Australian governments to ongoing funding for the Study. **(Recommendation 1)**

Multi-type child maltreatment in Australia

The Australian Child Maltreatment Study found that multi-type child maltreatment is common, describing it as the ‘typical experience of Australians who experience any child maltreatment’.² Accordingly, Relationships Australia **recommends** that the CSA SAP should be integrated with frameworks, strategies and plans to prevent and respond to other kinds of child maltreatment under the umbrella of under *Safe and Supported: The National Framework for Protecting Australia’s Children 2021-2031*, including with:

- public awareness and education campaigns to promote a shared understanding of what constitutes each sub-type of child maltreatment, and a shared awareness that the protection of children from maltreatment is a whole of community responsibility, and
 - service responses that take a lifecourse approach to relational wellbeing.
- (Recommendation 2)**

Relationships Australia acknowledges the historical fact that a standalone National Strategy in relation to child sexual abuse was a response to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. A standalone Strategy also reflects the criminality of this sub-type of maltreatment, which is shared only to varying extents by other sub-types of child maltreatment. Relationships Australia is, however, concerned about maintaining fragmentation of legal, policy and service responses to different sub-types. That fragmentation does not reflect:

- the prevalence of co-occurring sub-types of child maltreatment, and
- the adverse impacts, across the lifecourse, of experiencing each sub-type.

Scott et al (2023) observed that

....the prevalence of mental disorders was significantly increased for Australians who experienced any child maltreatment compared with that for those who did not experience child maltreatment (48.0% v 21.6%), and higher again for those who experienced multi-type child maltreatment (54.8%)..... all forms of child maltreatment were similarly associated with mental health harm, although associations were strongest for sexual abuse and emotional abuse.

² Higgins, D.J., Mathews, B., Pacella, R., Scott, J.G., Finkelhor, D., Meinck, F., Erskine, H.E., Thomas, H.J., Lawrence, D.M., Haslam, D.M., Malacova, E. and Dunne, M.P. (2023), The prevalence and nature of multi-type child maltreatment in Australia. *Med J Aust*, 218: S19-S25. <https://doi.org/10.5694/mja2.51868>

While emotional abuse is the sub-type least likely to attract legal sanction, the Australian Child Maltreatment Study found that its impact can be as devastating, and enduring, as child sexual abuse.³ The ACMS found that:

...emotional abuse was also consistently and independently associated with increased odds of most mental disorders, with associations similar in magnitude to those for sexual and physical abuse.... The associations between reported child maltreatment and mental disorders persisted throughout life.⁴

Continuing to isolate child sexual abuse within a standalone strategy:

- is not supported by the contemporary research literature
- entrenches siloed policy, justice and therapeutic service responses
- risks overlooking other forms of maltreatment, the consequent harms of which may be equally damaging, across the child's lifespan, and
- perpetuates stigma that may be an obstacle to help-seeking by both victim survivors and people who have engaged in child sexual abuse.

Relational wellbeing across the lifecourse

Relationships are not merely a proxy for other wellbeing measures; they are a primary determinant of safety, health and social and economic participation.

A whole of life course approach includes when people are children in a family, when they are out on their own and single, when they're in couples or other relationships, when they are parents of children and adolescents. This is rarely a linear progression in contemporary Australia. Relational wellbeing across the lifecourse and through periods of transition is a prerequisite of population health.

Building capacity for safe and meaningful relationships starts at infancy and extends through early childhood and adolescence. Increased awareness and apparent prevalence of adolescents using violence in the home, and of children and young people engaging in sexual violence against other family members and their peers, underscore the importance of capacity building for relational health at this developmental stage.⁵ Throughout early, middle and late adulthood, preventing relational distress and supporting relational health and skills development pays

³ Scott, J.G., Malacova, E., Mathews, B., Haslam, D.M., Pacella, R., Higgins, D.J., Meinck, F., Dunne, M.P., Finkelhor, D., Erskine, H.E., Lawrence, D.M. and Thomas, H.J. (2023), The association between child maltreatment and mental disorders in the Australian Child Maltreatment Study. *Med J Aust*, 218: S26-S33.

<https://doi.org/10.5694/mja2.51870>

⁴ Scott, J.G., Malacova, E., Mathews, B., Haslam, D.M., Pacella, R., Higgins, D.J., Meinck, F., Dunne, M.P., Finkelhor, D., Erskine, H.E., Lawrence, D.M. and Thomas, H.J. (2023), The association between child maltreatment and mental disorders in the Australian Child Maltreatment Study. *Med J Aust*, 218: S26-S33.

<https://doi.org/10.5694/mja2.51870>

⁵ See, eg, Fitz-Gibbon, K., Meyer, S., Boxall, H., Maher, J., & Roberts, S. (2022). Adolescent family violence in Australia: A national study of prevalence, history of childhood victimisation and impacts (Research report, 15/2022). ANROWS https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2022/09/06192210/RP.20.03-RR1_FitzGibbon-AFVinAus.pdf

powerful dividends in scaffolding a flourishing, cohesive community, and permanently disrupting intergenerational cycles of dysfunction, violence, and exclusion.

The Australian Child Maltreatment Study found that

Improving parenting skills and supporting healthy family interactions are fundamental to prevention of child maltreatment.⁶

Australia cannot end child maltreatment without confronting abuse and mistreatment across the lifecourse, at whatever life stage it presents. Disrupting chronic, intergenerational patterns of conflict and violence today (which may, for example, manifest through abuse and mistreatment of older family members) prevents child maltreatment tomorrow. Relationships Australia **recommends** that the CSA SAP recognise that children and adolescents who are exposed to abuse and mistreatment of older family members are, by virtue of that exposure, experiencing one of the recognised sub-types of child maltreatment (ie exposure to DFV) (ACMS, 2023). (**Recommendation 3**)

Fragmentation

Policy and service fragmentation remain substantial barriers to help-seeking for our clients, including those who have experienced child sexual abuse. Children and young people who have experienced any form of maltreatment may be engaged by multiple service systems, including health, education, adult justice, youth justice, family law courts, and child protection systems.

We welcome the work done to ‘apply the intent of Royal Commission recommendations to child sexual abuse in all settings, rather than limiting reforms to child sexual abuse that happens in institution’ (p 33 of the Strategy), as well as efforts to improve coordination in policy development, such as is currently occurring with this consultation and the consultation about the SAP for the National Plan to End Violence Against Women and Children.

However, fragmentation across and within systems persists. While, as noted above, much work is being done to reduce fragmentation, there remain extensive opportunities for governments to lift the burden of fragmentation from the shoulders of those least equipped to bear it.

Consistent with previous submissions about family violence and family law systems, Relationships Australia **recommends** that the CSA SAP should:

- be underpinned by a whole of lifecourse approach to understanding the experience of DFSV (including compounding harms) as well as risk and protective factors for experiencing and using DFSV

⁶ Scott, J.G., Malacova, E., Mathews, B., Haslam, D.M., Pacella, R., Higgins, D.J., Meinck, F., Dunne, M.P., Finkelhor, D., Erskine, H.E., Lawrence, D.M. and Thomas, H.J. (2023), The association between child maltreatment and mental disorders in the Australian Child Maltreatment Study. *Med J Aust*, 218: S26-S33.
<https://doi.org/10.5694/mja2.51870>

- adopt a wraparound, multi-disciplinary ‘whole of family’ approach, which sees and responds to victim survivors not as isolated individuals, but within their family (past and present), community and cultural contexts
 - take a universal, population-level approach to primary prevention of CSA
 - promote collaboration among services, supported by appropriate funding envelopes (rather than relying on the discretionary time, effort and goodwill of already over-worked and under-remunerated staff), and
 - drive improved collaboration among jurisdictions, so that no child is disadvantaged in terms of service (including justice) responses because of where they are located.
- (Recommendation 4)**

Children in out of home care

Relationships Australia **recommends** that the CSA SAP include a tailored set of measures to prevent and respond to child sexual abuse occurring in out of home care. **(Recommendation 5)**

Support for non-offending partners and other family members

Relationships Australia **recommends** that the CSA SAP include a tailored set of measures to enhance the supports available for non-offending partners and other family members of victim survivors of child sexual abuse. **(Recommendation 6)**

Amplifying the voices of children and young people through co-design

Children are independent rights-bearers. They are also victim-survivors of DFSV in their own right. Children and young people have been telling governments for some time that, to keep them safe from being victim survivors *and* from becoming users of violence, they need to have a voice and they need governments, service providers and other community members to listen to that voice.⁷ They have rightly objected to the dismissal and minimisation of their voices when they have tried to tell adults that they are in danger.

In our outreach and other services in educational settings, children and young people are expressing an urgent appetite for developmentally appropriate information and resources that are tailored to them and the specific relationship challenges they face. They are eager to develop relational skills to keep themselves, and other young people, safe, and to build their capacities to have flourishing, positive relationships.

⁷ See, eg, Carson, R., Dunstan, E., Dunstan, J., & Roopani, D. (2018). Children and young people in separated families: Family law system experiences and needs. Melbourne: Australian Institute of Family Studies. https://aifs.gov.au/sites/default/files/publication-documents/1806_children_and_young_people_in_separated_families_report_0.pdf; Australian Human Rights Commission (2024). ‘Help way earlier!’: How Australia can transform child justice to improve safety and wellbeing. Sydney: Australian Human Rights Commission. https://humanrights.gov.au/data/assets/pdf_file/0025/25477/1807_help_way_earlier_-_accessible_0-1-2.pdf. See also Consultation Paper, p 34.

Centring lived expertise, through authentic co-design,⁸ enhances the transparency and public accountability in policy and programme development, and the efficiency of government services, by supporting delivery of outcomes that are valued by service users, not just administrators. Further, where reform bears directly on people's lives and addresses a recognised public health issue such as child sexual abuse, rigorous scrutiny and testing of proposed amendments with the constituency is not merely a procedural nicety, but a substantive safeguard.

Relationships Australia has been heartened by recent progress towards elevating the rights and agency of children and young people, and amplifying their voices at systemic levels and in legal processes concerning them as individuals. We welcomed the inclusion of children explicitly as victim-survivors in their own right throughout the National Plan to End Violence Against Women and Children, as well as the expectation, set out in the National Principles to Address Coercive Control in Family and Domestic Violence, that the perspectives of children and young people be sought in implementing those Principles.

Relationships Australia **recommends** that the CSA SAP centre the voices of children and young people as intrinsic to effective service design, delivery and evaluation. **(Recommendation 7)** For the reasons canvassed in our submission about the Second Action Plan under the *National Plan to End Violence Against Women and Children 2022-2032*, we further **recommend** that the CSA SAP support universal risk screening for children, with a validated tool such as DOORS for Kids.⁹ Such screening is particularly critical in light of the ACMS findings about the high prevalence of multi-type maltreatment, and would offer a holistic picture of all the risks to which a child or young person is exposed at the outset of service intervention. **(Recommendation 8)**

Information sharing

Relationships Australia has welcomed the substantial progress, over the past years, in enhancing mechanisms by which salient information about DFSV risks can be more readily shared, to support the safety of victim survivors.

Services such as Children's Contact Services, Family Dispute Resolution Practitioners and Family Relationships Centres work directly with children and adults experiencing DFSV (including child sexual abuse), and those engaging in these forms of violence and abuse. However, these services are not included as Authorised Information Sharing Entities in the *National Strategic Framework for Information Sharing between the Family Law and Family Violence and Child*

⁸ For discussion of the abasement of the term 'co-design', particularly in First Nations policy, see eg Butler, T., Anderson, K., Black, O., Gall, A., Ngampromwongse, K., Murray, R., Mitchell, L., Wilkinson, K., Heris, C., Whop, L. J. (2025) Co-design Versus Faux-Design of Aboriginal and Torres Strait Islander Health Policy: A Critical Review.

⁹ Bailey, A., McIntosh, J.E., Booth, A., Lee, J. & Ralfs, C. (2023). The Kids' DOORS Handbook. Unpublished Manuscript. The Bouverie Centre, La Trobe University and Relationships Australia SA. Accessible at <https://familydoors.com/wp-content/uploads/2025/07/DOORS-Handbook-Final.pdf>

Protection Systems (the Information Sharing Framework).¹⁰ By extending the Framework, Government would make them safer for victim survivors of all forms of DFSV, including child sexual abuse and other sub-types of child maltreatment.

Accordingly, in our contribution to the statutory review of the Information Sharing Act and Regulations, and commenting on an Exposure Draft of the Family Law Amendment (Information Sharing) Bill 2026, we have recommended that:

- services such as Children’s Contact Services, Family Dispute Resolution services, and post-separation parenting programme providers be included as AISEs [Authorised Information Sharing Entities] under the Information Sharing Framework
- education programs to raise awareness of the Information Sharing Framework be extended to these parts of the ecosystem
- training and awareness programs should deal explicitly with the relationship between the Information Sharing Framework and applicable Commonwealth, State and Territory privacy legislation, and
- resourcing should be made available on a recurrent basis to support initial and ongoing refresher training, to enable professionals to keep up to date as the Information Sharing Framework and associated arrangements evolve. (See our letter of 14 May 2026 to the Family Safety Information Team in your Division)

We maintain this recommendation for the purposes of this consultation (**Recommendation 9**).

Conclusion

Thank you again for the opportunity to participate in this consultation. Please do not hesitate to contact me at ntebbey@relationships.org.au, or our National Policy Manager, Dr Susan Cochrane, at scochrane@relationships.org.au, should you wish to discuss this correspondence, or any other aspect of the work of Relationships Australia.

Kind regards



Nick Tebbey
National Policy Manager

¹⁰ National Strategic Framework for Information Sharing between the Family Law and Family Violence and Child Protection Systems. Accessible at <https://www.ag.gov.au/families-and-marriage/publications/national-strategic-framework-information-sharing-between-family-law-and-family-violence-and-child-protection-systems>