



National Plan to End Violence against Women and Children – Second Action Plan

Submission to the
Department of Social
Services

3 August 2026

Acknowledgement of Country

Knowmore acknowledges the Traditional Owners of the lands and waters across Australia upon which we live and work.

We pay our deep respects to Elders past and present for their ongoing leadership and advocacy.

Content note

This submission discusses experiences of trauma, including child abuse.

If you need to talk to someone, support is available.

13 YARN – 13 92 76

Blue Knot Helpline – 1300 657 380

1800 RESPECT – 1800 737 732

Lifeline – 13 11 14

Suicide Call Back Service – 1300 659 467

Knowmore provides legal help and related support for victims and survivors of child sexual abuse. You can call Knowmore on 1800 605 762.

Reflections of Chris Coombes and Barbara Charan (Fernandez)

We are grateful for the insights of victims and survivors, whose lived experience has informed this submission. This includes reflections from:

- Chris Coombes, Lived Experience Lead at Knowmore Legal Service
- Barbara Charan (Fernandez), Victim-Survivor of Familial Abuse, Communications Manager at Knowmore Legal Service.

A series of short videos featuring Chris' and Barbara's reflections are available on [Knowmore's website](#).¹

The perspectives expressed by this submission are Knowmore's.



Photo of Barbara Charan (Fernandez) and Chris Coombes

¹ See Knowmore, *Stories*, accessed 22 July 2026, <knowmore.org.au/knowmore-stories/>.

Summary of Knowmore's submission

- The problems with how Australian society seeks to prevent and respond to violence against women and children are nation-wide problems that require national leadership to address. The Australian Government should lead a coordinated, national approach to preventing and responding to violence against women and children, including child sexual abuse.
- Ongoing access to legal and related support is one of the most important items for empowering victims and survivors. The Australian Government should fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse.
- There is momentum supporting reforms to improve child safety, presenting an opportunity for the Australian Government to lead further coordinated reform. This should include implementing a nationally consistent approach to preventing child abuse.
- While we welcome recognition of children as victims and survivors of violence in their own right, recognition is not enough. The Australian Government should lead work to ensure that recognition translates into stronger protection of children's rights in practice.
- Too many people fall through the gaps and experience additional trauma as a result. The Australian Government should lead work to drive greater integration of the relevant systems and services, while maintaining and expanding dedicated services for children and survivors of child abuse.
- Work to prevent and respond to violence against women and children has been undervalued, including on the basis of gender. The Australian Government should ensure that this work is appropriately valued in light of its complexity and social importance.

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Introduction

I'd love to go back and tell 4-year-old me that there was absolutely nothing she did to have warranted what happened to her, regardless of what her abuser and those around him said. She was never at fault, she didn't do anything wrong.

I would love to tell her that she deserved to be loved and deserved to be protected, and that I'm sorry that that's not what she had growing up. But I would also love to tell her that in her future there's safety and there's love and she's going to be lucky enough to be the mum of 2 amazing young men.

That's what I'd like her to know.

Reflections of Barbara Charan (Fernandez), Victim-Survivor of Familial Abuse, Communications Manager at Knowmore Legal Service



Photo of Barbara Charan (Fernandez) as a 4-year-old

As a nation-wide service assisting victims and survivors of child abuse, we have a deep appreciation of the importance of the *National Plan to End Violence against Women and Children 2022–2032* (National Plan), as well as a keen understanding of the priorities for further action.

Knowmore is proud to have played a significant role in the implementation of the National Plan – particularly as it relates to preventing and responding to violence against children. We provide a range of services on a nation-wide basis, relevant to the National Plan. Of particular relevance are our legal and related services for victims and survivors of child sexual abuse, which are funded by the Australian Government through the Department of Social Services and the Attorney-General's Department (for more information about our service, see appendix 1).

Knowmore has partnered with the National Centre for Action on Child Sexual Abuse in delivering community legal education on navigating Australia's child safe laws.² We have also undertaken significant advocacy to improve laws, policies and practices impacting children and survivors of child sexual abuse in all jurisdictions. In this way, we have made broad contributions to the National Plan, continuing to the present day.

Our comments in this submission focus on preventing and responding to violence against children, reflecting the focus of our work. However, our comments are also likely to have a broader relevance to preventing and responding to violence against women and other forms of gender-based violence.

Knowmore welcomes the approach of the consultation paper for the Second Action Plan (consultation paper) of 'focus[ing] on areas where available evidence suggests opportunities to strengthen, refine or expand comprehensive service and system responses in relation to violence against women and children and other forms of gender-based violence'.³ We particularly welcome the consultation paper's recognition of 'children

² National Centre for Action on Child Sexual Abuse and Knowmore, *Navigating Australia's child safe legislation*, September 2025, <www.youtube.com/watch?v=QQCTHef2l3g>.

³ Australian National Research Organisation for Women's Safety (ANROWS) and Australian Government, Department of Social Services, *Evidence to action: informing direction for the Second Action Plan* (Consultation paper), May 2026, p 45, <engage.dss.gov.au/wp-content/uploads/2026/05/second-action-plan-consultation-paper.pdf>.

and young people as victim survivors of violence in their own right'.⁴ This is consistent with a human rights approach, which recognises children as rights holders 'independently from their parents or other adults'.⁵ Children are not only secondary victims or witnesses to violence experienced by adults.

Following the guidance provided by the Australian Child Maltreatment Study, the Second Action Plan should recognise children as victims and survivors in their own right if they experience any of the following:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- exposure to domestic and family violence
- multi-type maltreatment (where a child experiences 2 or more different types of maltreatment).⁶

The Australian Child Maltreatment Study found that victims and survivors of child maltreatment generally experience multiple types of maltreatment.⁷ Similarly, the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission) reported that victims and survivors of child sexual abuse are often targeted for further abuse, in childhood and adulthood, by different perpetrators, and for emotional and physical abuse.⁸

⁴ Consultation paper, p 33.

⁵ Leiden University, *Key elements of a children's rights based approach to legislative reform*, accessed 26 July 2026, <www.childrensrightsreform.org/what/key-elements-of-a-childrens-rights-based-approach-to-legislative-reform/recognition-of-children-as-rights-holders>.

⁶ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, 2023, pp 6–7, <<https://www.acms.au/resources/the-prevalence-and-impact-of-child-maltreatment-in-australia-findings-from-acms-2023-brief-report%2F>>.

⁷ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 8.

⁸ Royal Commission, *Final report: volume 3, impacts*, December 2017, p 140, <www.childabuseroyalcommission.gov.au/impacts>.

While acknowledging the broad range of matters noted by consultation paper, we particularly wish to highlight the following:

- **Violence against children is widespread and gender-based.** More than 3 in 5 people in Australia (62.2%) have experienced child maltreatment.⁹ Girls are more likely than boys to experience sexual abuse, emotional abuse, neglect and multi-type maltreatment. Boys and girls experience comparable levels of physical abuse and exposure to domestic violence.¹⁰ Gender diverse people are more likely to experience all forms of child maltreatment.¹¹
- **Child sexual abuse is an especially gender-based form of violence.** Girls are twice as likely as boys to experience child sexual abuse. More than 1 in 3 girls (37.3%) and almost 1 in 5 boys (18.5%) have experienced child sexual abuse.¹² Most perpetrators of child sexual abuse are men.¹³
- **The majority of victims and survivors of child sexual abuse experienced the abuse in family or community settings.**¹⁴ The abuse most commonly involved harmful sexual behaviours by known adolescents under the age of 18, or child sexual abuse

⁹ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 14.

¹⁰ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, pp 20 and 23.

¹¹ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 21.

¹² Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 17.

¹³ National Office for Child Safety, *Who perpetrates child sexual abuse?*, accessed 26 July 2026, <www.childsafety.gov.au/about-child-sexual-abuse/who-perpetrates-child-sexual-abuse>.

¹⁴ Australian Child Maltreatment Study, *Main findings*, accessed 27 July 2026, <www.acms.au/findings>; Ben Mathews et al., *Child sexual abuse by different classes and types of perpetrator: prevalence and trends from an Australian national survey*, Child Abuse and Neglect, volume 147, January 2024, p 5, <<https://www.sciencedirect.com/science/article/pii/S0145213423005501?via%3Dihub>>.

perpetrated by parents or other adult-like caregivers within the home.¹⁵

- **There are associations between violence against children and later violence against women.** Both women who experience violence and people who use violence in the home are more likely to have experienced child abuse.¹⁶
- **Perpetrators often use child sexual abuse as a form of violence against women.** For example, perpetrators may say that ‘they abused a child to get back at the child’s mother’. This is often connected to the perpetrator’s perception that the mother ‘failed to adhere to traditional femininity and to fulfill for the role of romantic/sexual partner and/or mother/homemaker to the perpetrator’s standard and preferences’.¹⁷
- **Children who experience intersectional marginalisation are more likely to experience violence.**¹⁸ For example, the Disability Royal Commission found that people with disability are more than twice as likely to experience physical or sexual abuse before the age of 15 than people without disability.¹⁹ Further, research conducted for the SA Royal Commission into Domestic, Family and Sexual Violence (SA

¹⁵ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, 2023, pp 17–18.

¹⁶ See, for example, Australian Institute of Health and Welfare, *Family, sexual and domestic violence: young women*, last updated 24 February 2026, accessed 26 July 2026, <www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/young-women>.

¹⁷ Kelly Richards and Emma Hussey, *World’s largest study of child sexual abuse perpetrators reveal why they abuse*, The Conversation, 27 May 2026, <theconversation.com/worlds-largest-study-of-child-sexual-abuse-perpetrators-reveals-why-they-abuse-275930>.

¹⁸ The term ‘intersectional marginalisation’ recognises that individuals may experience multiple forms of marginalisation and that these experiences may overlap to create additional barriers. We make further comments about this on pages 24 to 25.

¹⁹ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission), *Final report: volume 3, nature and extent of violence, abuse, neglect and exploitation*, 29 September 2023, p 10, <disability.royalcommission.gov.au/publications/final-report-volume-3-nature-and-extent-violence-abuse-neglect-and-exploitation>.

Royal Commission) showed that ‘social disadvantage, discrimination and where children grow up is related to a disproportionate increase in the experience of domestic, family or sexual violence’, including for First Nations children.²⁰

We share the perspective of the SA Royal Commission that:

*The ongoing and systemic social conditions that enable domestic, family and sexual violence across generations are rooted in harmful patriarchal norms embedded within society. Equally, intersecting systems of oppression and discrimination – such as racism, homophobia, transphobia, ageism, and the enduring impacts of colonialism – further sustain and exacerbate violence in all its forms ... These patterns highlight the need to address gender inequality as a shared challenge ... they speak to the complexity of our society and the importance of building inclusive responses and approaches that work for everyone.*²¹

A key recommendation of our submission is that the Second Action Plan should include a commitment for the Australian Government to lead a coordinated, national approach to preventing and responding to violence against women and children. This should connect to a commitment for the Australian Government to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse. We propose to provide this service in accordance with our integrated, multidisciplinary model, including lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors, and financial counsellors.

Our submission proceeds in 3 parts:

- First, we make general comments, relevant to the consultation as a whole.

²⁰ SA Royal Commission into Domestic, Family and Sexual Violence (SA Royal Commission), *With courage: South Australia's vision beyond violence*, August 2025, pp 67 – 68, <www.royalcommissiondfsv.sa.gov.au/_data/assets/pdf_file/0006/1174695/With-Courage-Report.pdf>.

²¹ SA Royal Commission, *With courage: South Australia's vision beyond violence*, p 9.

- Second, we make comments about the need for the Australian Government to lead a coordinated, national approach to preventing and responding to violence against women and children. This includes comments about the need to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse.
- Third, we make comments about each 5 priority areas identified by the consultation paper.

List of recommendations

Recommendation 1

The Second Action Plan should include a commitment for the Australian Government to lead a coordinated, national approach to preventing and responding to violence against women and children.

Recommendation 2

The Second Action Plan should include an action item for the Australian Government to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse.

Recommendation 3

The nation-wide, legal and related support service for victims and survivors of child abuse (see recommendation 2) should be an integrated, multidisciplinary service, including lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors and financial counsellors.

Recommendation 4

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments in relation to the following matters:

- developing a national framework for redress and reparation schemes
- implementing best practice in victims support schemes
- implementing best practice in the role of victims' commissioners
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors
- addressing barriers to victims and survivors speaking out about their own experiences, while maintaining appropriate protections for the safety and privacy of children and other survivors
- expanding victims' and survivors' access to restorative justice options, with appropriate safeguards to support survivors to make informed decisions and protect against potential abuse of the processes by perpetrators
- addressing barriers to victims and survivors reporting child abuse to the police
- expanding the role of lived experience in decision-making and ensuring it is appropriately valued
- providing economic, social and cultural justice for victims and survivors of child abuse.

Recommendation 5

The Second Action Plan should maintain and expand the commitment expressed by the First Action Plan to addressing systemic inequalities that enable child abuse, marginalise victims and survivors and protect perpetrators from accountability. This should include developing and implementing strategies for preventing and responding to child abuse tailored to children, victims and survivors who experience intersectional marginalisation. These strategies should place great weight on the lived experience of children, victims and survivors who experience intersectional marginalisation.

Recommendation 6

The Second Action Plan should include action items for the Australian Government to lead work with state and territory governments to implement a nationally consistent approach to preventing child abuse. These should include:

- nation-wide implementation and enforcement of the Child Safe Standards and the National Principles for Child Safe Organisations
- implementing nationally consistent reportable conduct schemes, reflecting best practice standards
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors
- implementing a national information exchange scheme, enabling direct information-sharing for child safety purposes between relevant organisations, both within and across jurisdictions
- implementing a nation-wide approach to improve education and community awareness, including in relation to consent and ‘wellbeing, relationships, and safety, including online safety’ (consistent with item 4 of the First National Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse and recommendation 38 of the Australian Law Reform Commission’s *Safe, informed, supported* report)
- implementing a nation-wide approach to safely reducing the number of children in institutional environments that present a heightened risk of child sexual abuse, including prisons and out-of-home care

[Continued below]

[Continued from above]

- ensuring adequate and secure funding of all child safety regulators, recognising that this will require an increase in funding for many child safety regulators
- ensuring adequate and secure funding for offender prevention and intervention services for potential and existing offenders
- ensuring adequate and secure funding for support services, including a nation-wide support service to provide victims and survivors of child abuse with legal and related support in relation to the comprehensive range of legal issues that victims and survivors experience.

Recommendation 7

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to better recognise children as victims and survivors of violence in their own right, and to strengthen the protection of children's human rights in practice. This should include a commitment for the Australian Government to:

- establish a National Taskforce for reform of child justice systems, reporting to ministers responsible for child justice and wellbeing across jurisdictions
- appoint a federal Cabinet Minister for Children, with responsibility for the human rights and wellbeing of children in Australia
- establish a Ministerial Council for Child Wellbeing, reporting to the National Cabinet
- pass a National Children's Act and an Australian Human Rights Act to legally protect the human rights of children.

It should also include a commitment for the Australian Government to lead work with state and territory governments to implement reforms of a similar nature.

Recommendation 8

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to ensure that responses to people who use violence:

- are evidence-based
- prioritise preventing further violence, and providing safety, justice and healing for victims and survivors
- consider the complex and sensitive considerations that arise when a person who uses violence is also a survivor of violence themselves.

Recommendation 9

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to drive greater integration of systems and services for preventing and responding to family and domestic violence, sexual violence and child abuse. This should include:

- providing adequate funding for support services to undertake collaborative work, recognising the additional work that is often required to implement a successful collaborative project
- ensuring that systems navigation services are available to all children and survivors of child abuse
- ensuring that reporting hubs are available to all victims and survivors of child abuse
- maintaining and expanding dedicated services for children and survivors of child abuse.

Recommendation 10

The Second Action Plan should include a commitment for the Australian Government to ensure that work to prevent and respond to violence against women and children is appropriately valued in light of its complexity and social importance. In doing this, the Australian Government should take into account:

- the need to recruit and retain suitably skilled staff
- the pay and conditions of equivalent roles in the government and private sectors
- the importance not only of formal qualifications, but also of lived experience, cultural knowledge and experience in community-based work
- the gender-based undervaluation of relevant work.

Recommendation 11

The Second Action Plan should include a commitment for the Australian Government, and state and territory governments, to ensure that support services have adequate and secure funding. This must include:

- a realistic assessment of the demand for the service
- indexation to reflect the increasing costs of delivering services
- funding terms of at least 5 years
- at least 12 months' notice of any funding decrease.

Recommendation 12

In developing the Second Action Plan, the Department of Social Services should consider Knowmore's capability development service as a model that has significant potential to further strengthen and support the workforces engaged in preventing and responding to violence against women and children.

General comments relevant to the consultation as a whole

We make general comments below, relevant to the consultation as a whole, about the following matters:

- terms used in this submission
- the importance of lived experience
- the Australian Government's commitment to a 'tell us once' approach
- the importance of moving away from siloed approaches to preventing and responding to child abuse.

Terms used in this submission

Knowmore recognises that people who have experienced gender-based violence have diverse perspectives about the most appropriate terms to use. In this submission, we have generally used the terms 'victims and survivors' and 'survivors', informed by our experience assisting victims and survivors of child abuse, and guidance from the National Centre for Action on Child Sexual Abuse (National Centre).²²

We commend the National Centre for producing *The child sexual abuse language guide*, which provides practical guidance informed by the lived experience of victims and survivors.²³

²² National Centre for Action on Child Sexual Abuse, *The child sexual abuse language guide*, 2025, p 19, <nationalcentre.org.au/wp-content/uploads/2025/08/1.-NC-Language-Guide_FINAL.pdf>.

²³ National Centre for Action on Child Sexual Abuse, *The child sexual abuse language guide*, p 6.

The importance of lived experience

To me, lived experience means nothing about us without us. As a survivor myself, I want to use my own experience to prevent harm to others.

Reflections of Chris Coombes, Lived Experience Lead at Knowmore Legal Service

We welcome the National Plan's recognition of the importance of lived experience in preventing and responding to violence against women and children:

No effective solutions can be developed without the people most affected by them, and whom this National Plan intends to serve. Victim-survivors must be at the heart of solutions. Victim-survivors have specific and contextual expertise that comes from lived experience of abuse and violence. They have intimate first hand knowledge of services, systems, and structures that are meant to support them but have sometimes failed them. They know from experience the weaknesses and strengths of interventions in practice.

The National Plan commits to working with victim-survivors and recognises the value of lived experience in informing appropriate and effective initiatives.²⁴

In Knowmore's view, lived experience should be given substantial weight in developing, implementing and evaluating the Second Action Plan. For many victims and survivors of child abuse, contributing to systemic change is an important part of their healing journey. We see the immense value of lived experience in shaping systems reform, as it puts the

²⁴ Australian Government, Department of Social Services, *National Plan to End Violence against Women and Children 2022–2032* (National Plan), p 68, accessed 30 July 2026, <<https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>>.

experiences of those impacted at the centre of decision-making and helps to ensure that service systems are fit-for-purpose.²⁵

Human rights law recognises that all children have the right to participate in matters that affect them.²⁶ This includes participation, in an age-appropriate way, in decision-making about matters of child safety, wellbeing and justice.²⁷ For example, we note recent consultations that supported direct participation by children and young people by the Australian Human Rights Commission,²⁸ the Disability Royal Commission²⁹ and the WA Commissioner for Children and Young People.³⁰ We make further comments about children's participation in decision-making on pages 61 to 63.

We wish to emphasise the importance of an intersectional approach to understanding the experiences of children, victims and survivors. An intersectional approach recognises that individuals may experience

²⁵ See Knowmore, *Helping survivors advocate for change*, accessed 19 June 2026, <www.knowmore.org.au/leading-change/supporting-survivors/>.

²⁶ *Convention on the Rights of the Child*, article 12, <www.ohchr.org/sites/default/files/crc.pdf>.

²⁷ See Royal Commission, *Final report: volume 10, harmful sexual behaviours by children*, December 2017, p 36, table 10.1, <www.childabuseroyalcommission.gov.au/children-harmful-sexual-behaviours>.

²⁸ Australian Human Rights Commission, *'Help way earlier!': How Australia can transform child justice to improve safety and wellbeing* (Help way earlier), 21 June 2024, p 23, <humanrights.gov.au/sites/default/files/document/publication/1807_help_way_earlier_accessible_0.pdf>

²⁹ See, for example, Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission), *Public hearing 24: the experience of children and young people with disability in different education settings*, accessed 22 July 2026, <disability.royalcommission.gov.au/public-hearings/public-hearing-24-experience-children-and-young-people-disability-different-education-settings>.

³⁰ WA Commissioner for Children and Young People, *What young people said: youth consultation on the social media plan*, 2026, pp 7–8, <www.ccyp.wa.gov.au/media/zcvh4bhz/what-young-people-said-web.pdf>.

multiple forms of marginalisation and that these experiences may overlap to create additional barriers.³¹

As noted on page 11, children who experience intersectional marginalisation are more likely to experience abuse. This is consistent with Knowmore's experience – many of our clients experience intersectional marginalisation, impacting their experience of strategies to prevent and respond to child abuse. For example, more than half of Knowmore's clients identify as having a disability, and 2 in 5 of our clients identify as Aboriginal and/or Torres Strait Islander peoples. Many Aboriginal and/or Torres Strait Islander clients are also people with disability, which can lead to additional barriers when seeking safety, justice and support.³²

For further comments about the importance of lived experience, see pages 49 and 75 to 76.

The 'tell us once' approach

We note that the Australian Government is working on 5 closely related action plans under 4 national frameworks, including the Second Action Plan under the *National Plan to End Violence against Women and Children*.³³ We welcome the Australian Government's commitment to a 'tell us once' approach to the consultations on the various actions plans, 'so that people don't have to tell their story or advise us multiple times'.³⁴ This reduces the barriers to participating in the consultations, including the risk

³¹ See for example, United Nations Network on Racial Discrimination and Protection of Minorities, *Guidance Note on Intersectionality, Racial Discrimination and Protection of Minorities*, 22 September 2022, p 3, <www.ohchr.org/sites/default/files/documents/issues/minorities/30th-anniversary/2022-09-22/GuidanceNoteonIntersectionality.pdf>.

³² For more information about who we assist, see appendix 1.

³³ Australian Government, Department of Social Services, *Consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022-2032)*, accessed 1 June 2026, <<https://engage.dss.gov.au/second-action-plan/>>; National Office for Child Safety, *Community survey to inform the development of the Second Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*, accessed 27 July 2026, <consultations.ag.gov.au/rights-and-protections/nocs-community-survey/>.

³⁴ Australian Government, Department of Social Services, *Consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022-2032)*.

of retraumatisation for victims and survivors. Due to the significant overlap between the various action plans and national frameworks, a ‘tell us once’ approach will help to ensure that all of the consultations are informed by the relevant information.

We consider that the Australian Government’s approach to the relevant consultations has significant potential to strengthen coordination across action plans. We hope that this will result in broad-based improvements to safety, justice and healing outcomes, while continuing to recognise the importance of dedicated support services for victims and survivors of child abuse.

We have made a related submission to the National Office for Child Safety about the Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*. We intend to publish our submissions, and have no concerns about our submissions being shared for the purpose of informing the relevant consultations.

The importance of moving away from siloed approaches

We note that ‘child sexual abuse occurring outside domestic and family violence contexts’ were outside the scope of the consultation paper for the Second Action Plan under the *National Plan to End Violence against Women and Children*. The consultation paper directs readers to the consultation to inform the Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*.³⁵ We hope that the ‘tell us once’ approach will minimise the impact of this (see the discussion above).

We share the consultation paper’s perspective that institutional child sexual abuse requires ‘dedicated policy attention, specialist expertise, a focused review of the evidence ... and tailored responses’.³⁶ At the same time, we consider that there must be a move away from siloed approaches to preventing and respond to child abuse, depending on

³⁵ Consultation paper, p 13.

³⁶ Consultation paper, p 3.

whether the abuse was sexual or non-sexual, and whether the abuse occurred in an institutional, family or community setting.

The siloed approach is, to some extent, a legacy of the Royal Commission's terms of reference, which directed the Royal Commission not to 'specifically examine the issue of child sexual abuse and related matters outside institutional context'.³⁷ However, even the Royal Commission's terms of reference recognised that the Royal Commission's recommendations were 'likely to improve the response to all forms of child sexual abuse in all contexts'.³⁸ The Royal Commission likewise observed:

Throughout our inquiry, we often heard that institutional child sexual abuse has occurred alongside child sexual abuse in familial or community contexts. Many survivors told us the impacts they experienced in institutions were compounded by sexual abuse they experienced elsewhere ...

*We recognise that the services and systems responses we have considered will in many circumstances be applicable to all survivors of child sexual abuse, no matter what the context of the abuse ... it is unrealistic in some situations for advocacy and support services to only be provided to institutional survivors.*³⁹

This aligns with our experience in delivering legal and related support services to victims and survivors of child sexual abuse, under our funding agreements with the Australian Government (see page 32 and appendix 1). Clients' understandings of their own experiences, rights and needs often do not align neatly with a distinction between institutional and non-institutional abuse. Given the nature and impacts of child sexual abuse,⁴⁰ it

³⁷ Royal Commission, *Terms of reference*, 14 November 2014, <www.childabuseroyalcommission.gov.au/terms-reference>.

³⁸ Royal Commission, *Terms of reference*.

³⁹ Royal Commission into Institutional Responses to Child Sexual Abuse, *Final report: volume 9, advocacy, support and therapeutic treatment services*, December 2017, p 9, <www.childabuseroyalcommission.gov.au/advocacy-support-and-therapeutic-treatment-services>.

⁴⁰ See generally Royal Commission, *Final report: volume 3, impacts*, pp 73-156; Royal Commission, *Final report: volume 4, identifying and disclosing child sexual abuse*, December 2017, pp 78-108, <www.childabuseroyalcommission.gov.au/identifying-and-disclosing-child-sexual-abuse>.

is common for clients to have highly personalised ways of describing what happened to them, or alternatively, not to have clear language at all. It is also common for us to experience multiple disclosures of child abuse over the course of working with a client, which may include abuse in both institutional and non-institutional settings. For clients who have experienced multiple incidents of child abuse, it would often be challenging and artificial to attribute the impacts (such as mental health impacts and their flow-on effects) to specific incidents of abuse, rather than the client's experience of abuse as a whole.

As a result of these factors, we avoid a siloed approach to service delivery to the extent that our funding agreements allow it. For example, we have a single intake process for clients, regardless of whether they experienced institutional abuse, non-institutional abuse or both. Our lawyers can provide advice relevant to both forms of abuse in a single appointment. This allows for advice that holistically considers the client's legal options and needs, and minimises the need for a client to re-tell their story multiple times.

We are approaching end of the National Redress Scheme (NRS) for victims and survivors of institutional child sexual abuse, with the deadline for applications on 30 June 2027 and the end of the NRS on 1 July 2028.⁴¹ After this point, a siloed approach to providing support is likely to become even more artificial, as there will no longer be a national redress scheme that distinguishes between institutional and non-institutional child sexual abuse.

The development of multiple action plans at the same time provides an opportunity for Australian governments to further move away from siloed approaches, and consider what would be most effective in ensuring child safety and responding to child abuse. As noted on page 9, victims and survivors of child maltreatment generally experience multiple types of maltreatment. We make further comments relevant to moving away from siloed approaches throughout this submission.

⁴¹ *National Redress Scheme for Institutional Child Sexual Abuse Act 2018* (Cth), sections 20(1)(e) and 193(1).

Key recommendations for the Second Action Plan

As noted on page 12, a key recommendation of our submission is that the Second Action Plan should include a commitment for the Australian Government to lead a coordinated, national approach to prevent and respond to violence against women and children. This should connect to a commitment for the Australian Government to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse. We make comments about these matters below.

The need for national leadership

A striking feature of laws, policies and practices that seek to prevent and respond to violence against women and children is the significant inconsistencies across different Australian jurisdictions. These inconsistencies affect many aspects of how governments seek to prevent and respond to child abuse –our submission includes many examples. We particularly wish to highlight the inconsistencies in victims' support schemes (see pages 29 to 30) and the regulatory environments for child safety (see pages 53 to 59).

There is no good reason for the level of inconsistency we see between different Australian jurisdictions. These inconsistencies result in significantly different levels of protection and support for children, victims and survivors, depending on where they live or where the abuse occurred. There are often additional challenges for victims and survivors whose experiences cross borders – for example, victims and survivors who have experienced child abuse in more than one jurisdiction. In relation to child safety, inconsistencies between regulatory frameworks contribute to gaps in

protection and the associated risk of jurisdiction-shopping by perpetrators.⁴²

There are also challenges for services in providing support across borders. Even within a particular subject area, there is often no one approach that will work nation-wide. For example, each state and territory has its own approach to victims' support schemes, requiring support services to develop different approaches to assisting victims and survivors to navigate these schemes in each state and territory.

The problems outlined in this submission are nation-wide problems that require national leadership to address. This insight underpins the National Plan.⁴³ It has been emphasised by many reviews and inquiries, from the Royal Commission through to recent reviews.⁴⁴ In relation to the Australian Government's role, we note that the Australian, state and territory governments have all endorsed the National Framework for Protecting Australia's Children (National Framework).⁴⁵ The National Framework recognises that all jurisdictions are responsible for working together to protect children in Australia, but in particular, 'the Australian Government provides national leadership in improving the wellbeing of Australia's children, families and communities'.⁴⁶ The Second Action Plan under the National Plan presents an opportunity to strengthen this leadership.

Knowmore recommends that the Second Action Plan include a commitment for the Australian Government to lead a coordinated,

⁴² See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, October 2025, p 20, <knowmore.org.au/wp-content/uploads/2025/10/submission-quality-and-safety-of-australias-early-childhood-education-and-care-system-cth.pdf>.

⁴³ National Plan.

⁴⁴ See, for example, Royal Commission, *Final report: volume 6, making institutions child safe*, December 2017, pp 249–253, <https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_6_making_institutions_child_safe.pdf>; Australian Human Rights Commission, *Help way earlier*, pp 12–13; Jay Weatherill AO and Pam White PSM, *Rapid Child Safety Review*, August 2025, p 3, <www.vic.gov.au/rapid-child-safety-review>.

⁴⁵ Australian Government, *Safe and supported: The National Framework for Protecting Australia's Children 2021–2031* (National Framework), 2021, pp 2–3, <www.dss.gov.au/the-nationalframework-for-protecting-australias-children-2021-2031>.

⁴⁶ Australian Government, National Framework, p 15.

national response to preventing and responding to violence against women and children.

Recommendation 1

The Second Action Plan should include a commitment for the Australian Government to lead a coordinated, national approach to preventing and responding to violence against women and children.

This should connect to a commitment to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse. We make further comments about this below.

A nation-wide legal and related support service

I googled Knowmore and it brought me to a number that I called, and I decided that it was probably time that I speak up about what happened to me as a child.

Talking about your hardest, darkest days is scary. I was fearful that I was going to have to share it all in one go. That wasn't the case. I got chatting to some lovely humans who made me feel really safe and made me feel I could go at my own pace as well. I think that really, really set the tone. The way that they provided me with a sense of control and autonomy throughout the process really took the edge off the anxiety that I was feeling about having to share the hard bits.

I felt a sense of relief once I did speak up. It was a gift to myself.

Reflections of Chris Coombes, Lived Experience Lead at Knowmore Legal Service

As highlighted by our comments above, the Second Action Plan should include a commitment for the Australian Government to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse. We propose to provide this service in accordance with our integrated, multidisciplinary

model, including lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement officers, and financial counsellors.

Although our recommendation is relevant to many parts of the National Plan, it would particularly build upon action 9 of the First Action Plan:

*Improve police responses and the justice system to better support victim-survivors through the provision of trauma-informed, culturally safe supports that promote safety and wellbeing, and hold people who choose to use violence to account.*⁴⁷

As highlighted by our comments on page 8, Knowmore provides a range of legal and related support services relevant to action 9. Of particular relevance are our services for victims and survivors of child sexual abuse, which are funded by the Australian Government through the Department of Social Services and the Attorney-General's Department.

This funding equips us to provide victims and survivors of child sexual abuse with legal and related support in relation to the following matters:

- the National Redress Scheme for victims and survivors of institutional child sexual abuse
- state/territory government-based victims support schemes
- redress schemes provided by an institution where child sexual abuse occurred
- reporting child sexual abuse to the police
- compensation or restitution orders against offenders as part of a criminal law process
- accessing documents from government and/or non-government organisations
- speaking out about experiences of child abuse – for example, navigating defamation law issues.

⁴⁷ Australian Government, Department of Social Services, *First Action Plan 2023–2027 under the National Plan to End Violence against Women and Children 2022–2032* (First Action Plan), 2023, p 13, <www.dss.gov.au/national-plan-end-violence-against-women-and-children/resource/first-action-plan-2023-2027>.

We work with both children and adults. This involves making situation-specific assessments of the person's capacity. The Law Society of NSW recognises that children regularly have the capacity to instruct a lawyer by the time they are 6- or 7-years old.⁴⁸ We consider what steps we can take to enhance a person's capacity,⁴⁹ which involves respectfully adjusting communication.⁵⁰ We also consider what support we can provide a person if they do not have the capacity to instruct a lawyer. This might include providing the person with information of a general nature and a supported referral to an appropriate service.

Knowmore undertakes advocacy, informed by our clients' experiences and perspectives, to improve laws, policies and practices impacting children and survivors of child abuse in all Australian jurisdictions. For many of our clients, contributing to systemic change is an important part of their healing journey. Many of our clients are motivated to come forward because they do not want anyone else to experience the same harm. Advocating for systemic change for children, victims and survivors is an important part of standing with our clients and honouring their experiences.

Although we are not specifically funded as system navigators (see pages 41 to 46), in practice, we provide significant assistance to victims and survivors in navigating complex legal and related support systems. This includes information and referrals.

Knowmore does not provide legal advice about civil law claims compensation. We refer victims and survivors to private lawyers for legal advice about civil law claims.

Our comments below address the following matters:

- victims' and survivors' experiences of the legal system

⁴⁸ Law Society of NSW, *Representation principles for children's lawyers*, 4th edition, August 2014, p 15, principle C1, <www.lawsociety.com.au/sites/default/files/2018-03/Representing%20Children.pdf>.

⁴⁹ Law Society of NSW, *Representation principles for children's lawyers*, 4th edition, p 15, principle C2.

⁵⁰ Law Society of NSW, *Representation principles for children's lawyers*, 4th edition, p 26–28, principle D6.

- the importance of trauma-informed legal support
- Knowmore's integrated, multidisciplinary model
- reflections from Knowmore's staff.

Victims' and survivors' experiences of the legal system

I don't think I know what justice means. I talk to a lot of victims and survivors of abuse and, for each and every person, the answer is different.

For me, justice was about being believed. A person in authority – in this case, the government – recognising that the abuse happened. Being believed in that way did feel like justice.

I feel like justice is also economic justice. I was working 2 jobs through my 20s to process and digest some of what happened to me as a child. Getting my counselling paid for from the redress scheme did feel like justice, that I didn't have to pay for that anymore.

Reflections of Chris Coombes, Lived Experience Lead at Knowmore Legal Service

The Royal Commission made detailed comments about the importance of a trauma-informed support service system for victims and survivors of child sexual abuse.⁵¹ In relation to legal support, the Royal Commission observed that:

... the complexity of the legal system, negative previous experiences with this system and the impacts of trauma can leave victims and survivors feeling disempowered and cause them additional and unnecessary distress. Legal elements within other service systems can also be difficult for victims and survivors to manage.⁵²

⁵¹ See Royal Commission into Institutional Responses to Child Sexual Abuse, *Final report: volume 9, advocacy, support and therapeutic treatment services*, pp 9–14.

⁵² Royal Commission into Institutional Responses to Child Sexual Abuse, *Final report: volume 9, advocacy, support and therapeutic treatment services*, p 175, recommendation 9.4.

More recently, the Australian Law Reform Commission (ALRC) undertook a landmark inquiry into justice responses to sexual violence, delivering the *Safe, informed, supported* report in January 2025. The ALRC described a justice system that remains largely inaccessible and retraumatising for victims and survivors of sexual violence, including child sexual abuse:

*For individuals and society to benefit from the justice system, people who have experienced sexual violence need to have access to it. But 9 out of 10 women who have experienced sexual violence do not report it to the police. Where there is engagement with the justice system, that engagement is usually short-lived. Those who do engage too often experience the justice system as retraumatising.*⁵³

These comments by the Royal Commission and the ALRC resonate with our experience assisting victims and survivors of child abuse. As we reflected in our submission to the ALRC:

*Many victims and survivors of child sexual abuse achieve life-changing outcomes through the legal system. However, many are also let down by legal processes that are not survivor-focused – processes that are inaccessible, retraumatising and culturally unsafe. Many victims and survivors never receive justice for the abuse perpetrated against them as children and many feel that the legal system only exacerbated the harm.*⁵⁴

The ALRC considered that:

The problem demands the justice system do better, and respond in a way that promotes a fairer, more respectful, and safer society. The key to achieving this is increasing access to justice for sexual violence. If more people can access the justice system, meaningfully engage with it, and reach a just outcome, the justice system's critical role in responding to harm can be better realised, bringing

⁵³ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, January 2025, p 62, paragraph 1.3, <www.alrc.gov.au/wp-content/uploads/2025/02/JRSV-Final-Report-Book-for-Web-final-20250211.pdf>.

⁵⁴ Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, June 2024, p 12, <knowmore.org.au/wp-content/uploads/2024/06/submission-justice-responses-to-sexual-violence-cth.pdf>.

*benefits to people who have experienced sexual violence and the community, and moving us closer to ending sexual violence.*⁵⁵

Knowmore broadly agrees. We particularly welcome the ALRC's recognition that the justice needs of victims and survivors are broader than access to legal options. Although access to legal options is certainly important, the legal system is often unjust. The justice needs of victims and survivors also often include 'participation, voice, validation, vindication, and accountability'.⁵⁶ We would add that, in our experience, the justice needs of victims and survivors also often include answers to their questions about the abuse and change to prevent harm further harm (see page 33).

The importance of trauma-informed legal support

For me, trauma-informed practice recognises and responds to the impact of trauma on the whole person. It is a strength-based, holistic approach.

It prioritises cultural safety, empowerment, trust, choice and collaboration to reduce retraumatisation, and to support healing and wellbeing.

This really matters because victims and survivors have experienced trauma attached to people who hold positions of authority and power – whether in institutions, in families or in community settings.

A trauma-informed legal service has a responsibility to resist retraumatisation by avoiding procedures and practices that may inadvertently recreate circumstances or experiences that mirror survivors' trauma.

Reflections of Yvonne Urry, Manager Trauma Informed Practice at Knowmore Legal Service

⁵⁵ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 64, paragraph 1.10.

⁵⁶ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 52.

If I look back over my life, I can see the impact that trauma has had in interpersonal relationships, connecting with loved ones, connecting with friends, education. There was a period where I was zoning out a lot at school and just wanting to be elsewhere, so I think it does have a lifelong impact and I think it's hard to know what that is at any one point in time.

It might be the flashbacks that people have, or certain smells or sensations that take you away from the very real moments where we're interacting with others. I think that's the way that trauma can show up over the life course.

Reflections of Chris Coombes, Lived Experience Lead at Knowmore Legal Service

As highlighted on page 35, the legal system is complex and often inaccessible and retraumatising for victims and survivors of child sexual abuse. Many inquiries, over many years and across Australian jurisdictions, have highlighted the need to provide victims and survivors with greater support to navigate the legal system. For example, the Victorian Victims of Crime Commissioner (VOCC) made the following comments in the report on a systemic inquiry into victim participation in the justice system in November 2023:

There have been sufficient reviews and inquiries, including reviews examining the existing system in depth, to demonstrate that the current approach to victim support is not meeting victims' needs.

...

Victims need, and deserve, a properly resourced victim support system that can provide the type of support they need, including in

*duration, intensity and specialisation. The current victim support system has already been found to be inadequate and falling short.*⁵⁷

In relation to legal assistance specifically, the Victorian Victims of Crime Commissioner commented that:

Findings relating to victims' unmet legal needs are not new.

...

*Victims' views, consultations with experts and stakeholders, and the overwhelming evidence from previous reviews and inquiries, support the VOCC's conclusion that enhanced legal advice and assistance is fundamental to victim participation in the justice system.*⁵⁸

The Victorian Victims of Crime Commissioner recommended that the Victorian Government 'fund an enhanced victim support system in Victoria'⁵⁹ and expand the existing Victims Legal Service in Victoria 'to provide victims with specialist, state-funded legal assistance in relation to the comprehensive range of legal issues that victims face'.⁶⁰ Knowmore supports these recommendations.

However, as a nation-wide service that assists victims and survivors of child abuse, we are concerned by the gaps in assistance in all parts of Australia and recognise the importance of a nationally consistent response. In Knowmore's view, victims and survivors of child abuse in all parts of Australia should have access to free, independent and trauma-informed legal assistance and wraparound support in relation to the comprehensive range of legal issues that victims and survivors experience. This is particularly important for ensuring that victims and survivors not only have meaningful access to legal options, but to the full range of

⁵⁷ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, November 2023, p 360, <www.victimsofcrimecommissioner.vic.gov.au/media/lpufjx5h/silenced-and-sidelined_systemic-inquiry-into-victim-participation.pdf>.

⁵⁸ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 369 and 373.

⁵⁹ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 362, recommendation 17.

⁶⁰ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 376, recommendation 21.

services that can assist victims and survivors with safety, justice and healing.

Some elements of such a service already exist, or will soon be piloted, in many parts of Australia.⁶¹ However, there is not presently a service that provides free, independent and trauma-informed legal assistance and wraparound support in relation to the comprehensive range of legal issues that victims and survivors of child sexual abuse experience, let alone survivors of child abuse more broadly.

We envisage a comprehensive service assisting victims and survivors of child abuse with at least the broad range of matters identified by the Victorian Victims of Crime Commissioner (see appendix 2).⁶² In addition to those matters, the same comprehensive service should be funded to assist victims and survivors of child abuse to understand and access their redress and justice-making options (for example, redress schemes provided by institutions), and provide independent legal support to victims and survivors in relation to all parts of the criminal legal process (see pages 47 to 48).

A comprehensive service is especially important, as many victims and survivors do not know what their legal options are, let alone which options will best meet their needs, before receiving legal advice. Based on our experience as a multidisciplinary service, we also consider it essential for this legal assistance to be delivered by dedicated services that can provide wraparound support, recognising the impacts of child abuse and the importance of a trauma-informed response.

Knowmore considers that what is needed is a free and independent, nation-wide service that provides legal and related support to victims and survivors of all forms of child abuse. This would include child sexual abuse,

⁶¹ See Knowmore, *Submission to the Australian Law Reform Commission Inquiry into justice responses to sexual violence*, 7 June 2024, pp 15–16; Hon Michelle Rowland MP, *Expanded access to specialised and trauma-informed sexual violence legal services pilots in NSW and Qld*, 8 March 2026, accessed 30 July 2026, <<https://ministers.ag.gov.au/media-centre/expanded-access-specialised-and-trauma-informed-sexual-violence-legal-services-pilots-nsw-and-qld-08-03-2026>>.

⁶² Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 373–375.

but also physical abuse, emotional abuse, neglect, exposure to domestic and family violence, and multi-type maltreatment.⁶³ A comprehensive service of this nature would be appropriate for the following reasons:

- It would better align with the experiences, perspectives and needs of many victims and survivors. As noted on page 9, victims and survivors of child maltreatment generally experience multiple forms of maltreatment.
- A comprehensive service could better assist victims and survivors of child abuse in navigating the complex and fragmented systems for accessing safety, justice and support. This complexity and fragmentation is illustrated by many of the challenges we already assist our clients to navigate. For example, we often experience difficulties in getting the National Redress Scheme to recognise grooming and voyeurism as child sexual abuse.⁶⁴ We also experience difficulties in getting victims' support schemes to recognise forms of abuse that were not crimes at the time they occurred, or without evidence that the abuse caused a specific injury or loss.⁶⁵
- A comprehensive service would address a critical gap in support for victims and survivors of non-sexual forms of child abuse.

In light of the above, we consider that a comprehensive service would be best able to provide legal and related support to victims and survivors of child abuse broadly. We therefore recommend that the Australian Government fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse.

⁶³ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, pp 6–7.

⁶⁴ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 97–101, <knowmore.org.au/wp-content/uploads/2026/03/submission-joint-standing-committee-on-implementation-of-the-national-redress-scheme.pdf>.

⁶⁵ See, for example, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 49–50.

Recommendation 2

The Second Action Plan should include an action item for the Australian Government to fund Knowmore as a nation-wide legal and related support service for victims and survivors of child abuse, including child sexual abuse.

We consider that ongoing access to legal and related support is one of the most important items for empowering victims and survivors. We make further comments about this in relation to the relevant priority area for the consultation on pages 47 to 50.

While ever child abuse continues to occur, victims and survivors must be able to have confidence that Knowmore will remain funded to provide legal and related support. We make further comments about the importance of adequate and secure funding for support services on pages 76 to 77.

Knowmore's integrated, multidisciplinary model

Knowmore uses an integrated, multidisciplinary model to provide trauma-informed, client-centred and culturally safe legal assistance to clients. We have a unique service delivery model, bringing together lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors and financial counsellors to provide coordinated support to clients (see appendix 1 for more information about Knowmore's model). This is recognised as a best practice approach to assisting clients who have experienced trauma.

In his 2022 book, *Monetary abuse for redress in state care*, Dr Stephen Winter provided the following outline of the support needs of victims and survivors of child sexual abuse. Although Dr Winter's comments were made in relation to the NRS, they are broadly relevant to the support needs of victims and survivors when navigating their options for accessing safety, justice and support. Dr Winter commented:

Survivors need support when preparing and submitting redress applications; they need help through (often protracted) assessment processes, assistance when they receive payments, and afterwards.

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Large numbers of survivors will have 'low levels of education and varying literacy skills, high levels of mental health issues and a reduced capacity to cope with delays and frustrations' ... The resulting difficulties make good support necessary to survivors and to the effectiveness of any redress programme. Support work is not ancillary, it is part of redress.⁶⁶

Dr Winter noted the effectiveness of Knowmore's service model in meeting these needs:

A community law initiative in Australia offers a promising model for holistic practice. Originally developed to help survivors work with the McClellan Commission (2013–2017), knowmore was well-positioned to support applicants when the NRS began in 2018. Services are free to survivors because knowmore receives block funding from Australian governments. Block funding limits cost-building incentives: because knowmore staff are salaried (and not fee-for-service), they do not profit from individual claims. More importantly, knowmore trains legal professionals to work with survivors. That includes training in Indigenous cultures and workshops on trauma-informed practices (AU Interview 5). As a result, knowmore's lawyers are redress experts with a personal and professional ethos that prioritises the survivors' well-being. And, of course, knowmore's funding structure and ethos limits the prospect of gross malpractice.

knowmore's holistic practice offers counselling and financial advice alongside legal services. It can be difficult to talk about injurious experiences with a lawyer. Some survivors will be difficult clients – they will miss meetings, fail to provide evidence, or have problems managing their emotions. Trauma-informed training can help lawyers learn how to get information from clients effectively in ways that make survivors feel safe and supported (AU Interview 10). At

⁶⁶ Stephen Winter, *Monetary Redress for Abuse in State Care*, Cambridge University Press, part III, 18 November 2022, section 12.1, <www.cambridge.org/core/books/monetary-redress-for-abuse-in-state-care/monetary-redress-for-abuse-in-state-care/2670958350A4774D9D38A92D1171DD0A>.

*knowmore, lawyers and counsellors collaborate to promote survivor-focussed practice.*⁶⁷

The Australian Parliament's Joint Standing Committee on Implementation of the National Redress Scheme also recognised that Knowmore 'is highly regarded for the quality of their work'.⁶⁸

The following reflections from Knowmore's staff illustrate the importance of a multidisciplinary model when assisting victims and survivors of child abuse. We recommend that the nation-wide, legal and related support service for victims and survivors of child abuse (see recommendation 2) should be an integrated, multidisciplinary service, including lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors and financial counsellors.

Recommendation 3

The nation-wide, legal and related support service for victims and survivors of child abuse (see recommendation 2) should be an integrated, multidisciplinary service, including lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors and financial counsellors.

The reflections below also demonstrate the diverse and sophisticated skills required to provide appropriate support to victims and survivors of child abuse, and the organisational capability of Knowmore developed over 13 years of providing legal and related support to survivors. This, in turn, highlights the importance of long-term investment in appropriate support services. We make further comments about this in relation to workforce considerations on pages 72 to 77.

⁶⁷ Stephen Winter, *Monetary Redress for Abuse in State Care*, section 12.3.

⁶⁸ Australian Parliament, Joint Standing Committee on Implementation of the National Redress Scheme, *Redress: journey to justice*, November 2024, p 21, paragraph 1.102, <https://parlinfo.aph.gov.au/parlInfo/download/committees/reportjnt/RB000213/toc_pdf/RedressJourneytoJustice.pdf>.

Reflections from Knowmore's staff

There's been a lot of news lately that's reminded the community that child sexual abuse isn't something that's rare, nor is it something that's just of the past. It's got a lot of survivors asking questions like, 'What are my legal options?' 'What are my support options?'

For a lot of people, it can feel really overwhelming. They might not know where to start or who they can call to ask these questions.

Some people may have heard of the National Redress Scheme, which has helped many survivors, but it only covers people who have experienced institutional child sexual abuse after 30 June 2018. It's also ending – you have to have your application in by 30 June 2027.

This leaves many survivors feeling really uncertain about what options are actually out there for them. These systems are really complex and too many survivors fall through the gaps.

Understanding your options really is the starting point. Knowmore is here to help with that. Our lawyers not only provide legal advice, but also community legal education to make the information more widely available.

Reflections of Mary Nguyen, Senior Lawyer at Knowmore Legal Service

The Support Services team at Knowmore is itself a multidisciplinary team of social workers, counsellors and therapists.

We support clients in legal appointments, and provide a triage response to clients presenting with imminent safety, risk and wellbeing concerns. We also provide short-term and long-term ongoing support to clients navigating the National Redress Scheme or victims of crime schemes.

The Support Services team provides trauma-informed debriefing, consultation and training for our colleagues. This ensures staff at Knowmore are equipped to navigate situations where clients present with distress and dysregulation in a way that is safe for both clients and staff. It also equips staff to identify and respond appropriately to safety and wellbeing concerns.

Reflections of Yvonne Urry, Manager Trauma Informed Practice at Knowmore Legal Service

Our service model has Aboriginal and Torres Strait Islander staff lead our engagement in urban, regional and remote areas. We have gender specific roles identified through the service methodology; clients have the choice of male or female Aboriginal and Torres Strait Islander engagement advisors. The role of these advisors is to work with all disciplines in Knowmore and services provided to clients across the footprint of our country.

An important part of our service delivery is the cultural lens which we share across all disciplines, this has been an important factor in focusing the work we do by building a platform which is the foundation of Indigenous intellect based on the values and lore that are evidence in Indigenous society across the contemporary landscape that captures and embraces the oldest living culture in the world.

Reflections of Gary Oliver, Executive Director Strategy and First Nations Engagement at Knowmore Legal Service

Redress and other significant payments can bring complex emotional responses. For some, they are a powerful acknowledgement of harm. For others, they can trigger feelings of anger or distress that the money is not enough to recognise the harm. Survivors may spend quickly to cope with trauma or repair lost connections. At Knowmore, we respond with compassion, understanding the link between money and trauma, so that payments support justice, healing and recovery.

Knowmore's financial counsellors help survivors prepare for and manage lump sum payments, addressing issues such as debts, impacts on Centrelink, housing, or aged care, and ensuring protections promised by government and banks are applied.

We help survivors in assessing their financial circumstances and prioritising debts. We provide survivors with advice about their options and advocate for our clients in dealings with debtors, governments and banks.

We help survivors to feel empowered in decision-making and to understand their rights. Our work helps to ensure that survivors receive the full benefit of their payments, and improves survivors' financial capability and wellbeing.

We were fortunate enough to be granted funding from the Financial Counselling Industry Fund to expand our service to all survivors of child sexual abuse. This is an area where we need increased funding. Survivors who we support under this funding stream do not have the same protections as survivors who receive a payment from the National Redress Scheme. However, they often have the same limited experience with lump sum payments and often have unmanaged debt.

I love that my role includes coordinating a program and supporting a team of people who are creating this justice pathway.

Reflections of Jenna Conway-Jones, Manager Financial Counselling at Knowmore Legal Service

Priority areas for consultation

We note that the consultation paper has proposed 5 priority areas for consultation:

- victim-survivors of violence against women and children and other forms of gender-based violence
- prevention and early intervention
- children and young people in their own right
- people who use violence
- system integration and workforce.⁶⁹

We make comments about each of these priority areas below.⁷⁰

Victim-survivors of violence against women and children and other forms of gender-based violence

We note that the National Plan and the consultation paper make detailed comments about the experiences and needs of victims and survivors.⁷¹ Previous reviews and inquiries have also made detailed comments relevant to this priority area.⁷² We do not seek to repeat those comments here.

We have made detailed comments about the importance of legal and related support for victims and survivors of child abuse, including child sexual abuse (see pages 31 to 41). In our view, this must be among the highest priorities for the Second Action Plan. It is essential for ensuring that victims and survivors can understand and access their options for safety, justice and healing. From our perspective as a nation-wide service for

⁶⁹ Consultation paper, p 12.

⁷⁰ Consultation paper, p 12.

⁷¹ See, for example, National Plan, pp 39–46; Consultation paper, pp 14–15.

⁷² See, for example, Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, pp 91–104; Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, pp 63–66.

victims and survivors of child abuse, the most significant issues also include:

- the inconsistencies in the justice-making and support options available to victims and survivors across different Australian jurisdictions (see the discussion on pages 67 to 72)
- the inadequate protection of victims' and survivors' rights in all Australian jurisdictions
- the marginalisation of victims and survivors from legal processes in all Australian jurisdictions – for example, criminal legal processes that treat victims and survivors as witnesses for the prosecution, rather than participants with a right to be heard.

These are nation-wide problems that require national leadership to address. We therefore consider that the Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments in relation to the following matters:

- developing a national framework for redress and reparation schemes, providing guidance to governments and institutions about best practice beyond the end of the National Redress Scheme⁷³
- implementing best practice in victims' support schemes, including in relation to eligibility, time limits, payment amounts, support options, application processes and review options⁷⁴
- implementing best practice in the role of victims' commissioners, including independence from government departments and services, legislative protections for the role, and broad functions to promote and protect needs of victims and survivors⁷⁵

⁷³ See, Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 189–191, recommendation 43.

⁷⁴ See, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 47–49.

⁷⁵ See, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 18–20.

- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors (for further comments about children’s rights, see pages 60–63 below)⁷⁶
- addressing barriers to victims and survivors speaking out about their own experiences, while maintaining appropriate protections for the safety and privacy of children and other survivors⁷⁷
- expanding victims’ and survivors’ access to restorative justice options, with appropriate safeguards to support survivors to make informed decisions and protect against potential abuse of the processes by perpetrators⁷⁸
- addressing barriers to victims and survivors reporting child abuse to the police⁷⁹
- providing victims and survivors with a right to be heard in relation to all parts of the criminal legal process⁸⁰
- expanding the role of lived experience in decision-making and ensuring it is appropriately valued (see pages 23–25)
- providing economic, social and cultural justice for victims and survivors of child abuse – for example, by ensuring adequate access to therapeutic services, cultural healing options and housing.⁸¹

⁷⁶ See, Knowmore, *Submission on the quality and safety of Australia’s early childhood education and care system*, pp 32–34, recommendation 7.

⁷⁷ See, Knowmore, *Speaking out*, accessed 29 July 2026, <<https://knowmore.org.au/for-survivors/speaking-out/>>.

⁷⁸ See, Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, pp 43–45, recommendations 17 and 18.

⁷⁹ See, Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, pp 21–28.

⁸⁰ See, Knowmore, *Submission: review of Queensland’s Charter of Victims’ Rights*, 17 October 2025, pp 11–13, <<https://knowmore.org.au/wp-content/uploads/2025/12/2025-10-17-Knowmore-Submission-Review-of-Queenslands-Victims-Charter.pdf>>.

⁸¹ See, National plan, pp 86–88.

Recommendation 4

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments in relation to the following matters:

- developing a national framework for redress and reparation schemes
- implementing best practice in victims support schemes
- implementing best practice in the role of victims' commissioners
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors
- addressing barriers to victims and survivors speaking out about their own experiences, while maintaining appropriate protections for the safety and privacy of children and other survivors
- expanding victims' and survivors' access to restorative justice options, with appropriate safeguards to support survivors to make informed decisions and protect against potential abuse of the processes by perpetrators
- addressing barriers to victims and survivors reporting child abuse to the police
- expanding the role of lived experience in decision-making and ensuring it is appropriately valued
- providing economic, social and cultural justice for victims and survivors of child abuse.

Prevention and early intervention

I had heard through the family that there was a younger family member who was, at the time, the age I was when my abuse started. I knew that my abuser had access to her and the adults around her who knew of my abuse were giving him access to her.

I didn't want to be like the adults I had around me when I was growing up.

Reflections of Barbara Charan (Fernandez), Victim-Survivor of Familial Abuse, Communications Manager at Knowmore Legal Service

We recognise that significant work has taken place in recent years to prevent child abuse and to strengthen early intervention.⁸² This work is having an impact. As the Australian Child Maltreatment Study states:

In recent years, there have been reductions in physical abuse, and in some types of sexual abuse. These reductions are extremely important. They mean that fewer children are suffering, and they indicate that change is possible. Policies and programs to reduce these types of maltreatment are having an effect.

Yet, there are other concerning trends, with some types of maltreatment becoming even more common, including emotional

⁸² National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Third Annual Report 2025*, 22 April 2026, pp 73–93, <<https://www.childsafety.gov.au/system/files/2026-04/third-annual-report-national-strategy-to-prevent-and-respond-to-child-sexual-abuse-2021-2030.PDF>>; National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Second Annual Report 2024*, 16 December 2024, pp 77–93, <<https://www.childsafety.gov.au/system/files/2024-12/national-strategy-second-annual-report-2024.pdf>>; National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: First Annual Report 2023*, 15 December 2023, pp 70–92, <<https://www.childsafety.gov.au/system/files/2023-12/first-annual-report-national-strategy-2023.PDF>>.

*abuse, some types of sexual abuse, and exposure to domestic violence. And new types of sexual victimisation are also emerging.*⁸³

As noted on page 10, violence against children is widespread in Australian society. We note that there has been an increase in harmful sexual behaviours by adolescent children, 'especially by those who are or were in a romantic relationship'.⁸⁴ We also note that online child sexual abuse is widespread and increasing.⁸⁵

Our comments in this section focus on improving the prevention of child abuse, including child sexual abuse. However, many of these comments are also relevant to strengthening early intervention and for informing responses to people who use violence (see pages 63 to 66).

Our comments below address the following matters:

- addressing the systemic inequalities that enable child abuse
- improving the regulatory environments for child safety.

Addressing the systemic inequalities that enable child abuse

We welcome the commitment of the First Action Plan to addressing 'the social, cultural, political and economic factors that drive gendered violence'.⁸⁶ As highlighted by our comments on pages 10 to 12, these factors are both gendered and intersectional, including 'racism, homophobia, transphobia, ageism, and the enduring impacts of colonialism'.⁸⁷ They

⁸³ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 2.

⁸⁴ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 18.

⁸⁵ Kerryann Walsh et al., *Prevalence and characteristics of online child sexual victimisation: findings from the Australian Child Maltreatment Study*, Child Abuse and Neglect, February 2025, volume 160, <www.sciencedirect.com/science/article/pii/S0145213424005799>; Australian Parliament, Employment References Committee, *Quality and safety of Australia's early childhood education and care system*, 31 March 2026, p 25, paragraph 2.4, <https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000685/toc_pdf/QualityandsafetyofAustralia'searlychildhoodeducationandcaresystem.pdf>.

⁸⁶ First Action Plan, p 23.

⁸⁷ SA Royal Commission, *With courage: South Australia's vision beyond violence*, p 9.

include, but extend beyond ‘attitudes and social norms’,⁸⁸ encompassing all of the systemic inequalities that enable child abuse, marginalise victims and survivors, and protect perpetrators from accountability.

In Knowmore’s view, the Second Action Plan should maintain and expand the commitment to addressing these systemic inequalities. This should include developing and implementing strategies for preventing and responding to child abuse tailored to children, victims and survivors who experience intersectional marginalisation. These strategies should place great weight on the lived experience of children, victims and survivors who experience intersectional marginalisation.

Recommendation 5

The Second Action Plan should maintain and expand the commitment expressed by the First Action Plan to addressing systemic inequalities that enable child abuse, marginalise victims and survivors and protect perpetrators from accountability. This should include developing and implementing strategies for preventing and responding to child abuse tailored to children, victims and survivors who experience intersectional marginalisation. These strategies should place great weight on the lived experience of children, victims and survivors who experience intersectional marginalisation.

Improving the regulatory environments for child safety

As highlighted by our comments on page 29, there remains a significant level of inconsistencies across Australian jurisdictions in the laws, policies and practices that seek to prevent and respond to violence against

⁸⁸ See First Action Plan, p 23.

women and children. This includes inconsistencies in the regulatory environments for child safety.⁸⁹ For example:

- there are inconsistencies in the 3 obligatory reporting models in Australia: mandatory reporting, 'failure to report' offences and reportable conduct schemes⁹⁰
- the Child Safe Standards and the National Principles for Child Safe Organisations are not being consistently implemented across Australia⁹¹
- the human rights of children in all parts of Australia are inadequately and inconsistently protected⁹²
- there has not yet been the necessary collaboration between governments to establish a national information exchange scheme of the type envisioned by the Royal Commission.⁹³

Inconsistencies in child safe practices within and across jurisdictions continue to create challenges in implementing effective measures to keep children safe.⁹⁴ For example, we note the following comments from the report in March 2026 of the Senate's inquiry into Australia's early childhood education and care system:

...complaints, reportable-conduct concerns, regulator findings, Working With Children Check (WWCC) information and police

⁸⁹ For example, see Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 18-19; Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report: Volume 7, Improving institutional responding and reporting*, December 2017, p 9, <https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_7_improving_institutional_responding_and_reporting.pdf>.

⁹⁰ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 26-29.

⁹¹ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 29-31.

⁹² See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 32-34.

⁹³ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 46-48.

⁹⁴ See, for example, Australian Parliament, Employment References Committee, *Quality and safety of Australia's early childhood education and care system*, p 35, paragraphs 2.49-2.50 and p 49, paragraph 3.18.

*intelligence sit in separate channels, with poor feedback loops and weak capacity to 'join the dots'. A more joined-up system that allows for better and smoother cooperation and coordination between police, regulators, providers and other relevant bodies will help improve child safety overall.*⁹⁵

Recent action to address the widespread abuse in the early childhood education and care sector has shown that, when the Australian Government takes leadership to keep children safe, coordinated and rapid reform is possible. For example, over the past 12 months, most state and territory governments have implemented reforms to improve working with children checks.⁹⁶ There is momentum supporting reforms to improve child safety, presenting an opportunity for the Australian Government to lead further coordinated reform to prevent child abuse.

Noting the focus of the consultation paper on child abuse in the context of domestic and family violence,⁹⁷ we particularly wish to highlight the importance of a nation-wide approach to improving education and community awareness.⁹⁸ Education and community awareness initiatives must reflect an understanding of child abuse that is broader than 'stranger

⁹⁵ Australian Parliament, Employment References Committee, *Quality and safety of Australia's early childhood education and care system*, p 128, paragraph 6.17.

⁹⁶ See for example, *Child Protection (Working with Children) and Other Legislation Amendment Act 2025* (NSW); *Worker Screening Amendment (Strengthening the Working with Children Check) Act 2025* (Vic); *Working with Vulnerable People (Background Checking) Amendment Act 2025* (ACT); *Care and Protection of Children Amendment (Worker Screening) Act 2026* (NT). Western Australia has yet to pass equivalent working with children check reform. See, Keane Bourke, *WA's delays on Working with Children Check, child safety changes criticised*, ABC News, 3 May 2026, accessed 28 July 2026, <<https://www.abc.net.au/news/2026-05-03/working-with-children-check-delays-in-western-australia/106635892>>; *Working with Children (Screening) Amendment Bill 2025* (WA).

⁹⁷ Consultation paper, p 13.

⁹⁸ See National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 38; Australian Law Reform Commission, *Safe, Informed, Supported: Reforming Justice Responses to Sexual Violence*, pp 32–34, recommendation 38.

danger', given that perpetrators of child abuse are generally known to the child.⁹⁹

In our view, the Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to implement a nationally consistent approach to preventing child abuse. These should include:

- nation-wide implementation and enforcement of the Child Safe Standards and the National Principles for Child Safe Organisations¹⁰⁰
- implementing nationally consistent reportable conduct schemes, reflecting best practice standards¹⁰¹
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors¹⁰²
- implementing a national information exchange scheme, enabling direct information-sharing for child safety purposes between relevant organisations, both within and across jurisdictions¹⁰³
- implementing a nation-wide approach to improve education and community awareness, including in relation to consent and 'wellbeing, relationships, and safety, including online safety' (consistent with item 4 of the First National Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse* and

⁹⁹ Australian Institute of Health and Welfare, *Australia's children*, last updated 25 February 2022, accessed 29 July 2026, <www.aihw.gov.au/reports/children-youth/australias-children/contents/justice-safety/child-abuse-neglect>; Ben Mathews et al., *Child sexual abuse by different classes and types of perpetrator: prevalence and trends from an Australian national survey*.

¹⁰⁰ See, Royal Commission, *Final report: volume 6, Making institutions child safe*, p 292, recommendation 6.8.

¹⁰¹ See, Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report: Volume 7, Improving institutional responding and reporting*, p 283, recommendation 7.9.

¹⁰² See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 32–34, recommendation 7.

¹⁰³ See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 46–48, recommendation 12.

recommendation 38 of the Australian Law Reform Commission's *Safe, informed, supported* report)¹⁰⁴

- implementing a nation-wide approach to safely reducing the number of children in institutional environments that present a heightened risk of child sexual abuse, including prisons and out-of-home care¹⁰⁵
- ensuring adequate and secure funding of all child safety regulators, recognising that this will require an increase in funding for many child safety regulators¹⁰⁶
- ensuring adequate and secure funding for offender prevention and intervention services for potential and existing offenders¹⁰⁷
- ensuring adequate and secure funding for support services, including a nation-wide support service to provide victims and survivors of child abuse with legal and related support in relation to the comprehensive range of legal issues that victims and survivors experience (see pages 31 to 41).

¹⁰⁴ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 38, item 4; Australian Law Reform Commission, *Safe, Informed, Supported: Reforming Justice Responses to Sexual Violence*, pp 32–34, recommendation 38.

¹⁰⁵ See Royal Commission, *Final report: volume 5, private sessions*, December 2017, p 400, table P.13, <https://www.royalcommission.gov.au/system/files/2021-08/carc-final-report-volume-5-private-sessions_0.pdf>.

¹⁰⁶ See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 41–43, recommendation 10.

¹⁰⁷ See, Royal Commission, *Final report: volume 6, Making institutions child safe*, p 107, recommendation 6.2.

Recommendation 6

The Second Action Plan should include action items for the Australian Government to lead work with state and territory governments to implement a nationally consistent approach to preventing child abuse. These should include:

- nation-wide implementation and enforcement of the Child Safe Standards and the National Principles for Child Safe Organisations
- implementing nationally consistent reportable conduct schemes, reflecting best practice standards
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors
- implementing a national information exchange scheme, enabling direct information-sharing for child safety purposes between relevant organisations, both within and across jurisdictions
- implementing a nation-wide approach to improve education and community awareness, including in relation to consent and ‘wellbeing, relationships, and safety, including online safety’ (consistent with item 4 of the First National Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse and recommendation 38 of the Australian Law Reform Commission’s *Safe, informed, supported* report)
- implementing a nation-wide approach to safely reducing the number of children in institutional environments that present a heightened risk of child sexual abuse, including prisons and out-of-home care

[Continued below]

[Continued from above]

- ensuring adequate and secure funding of all child safety regulators, recognising that this will require an increase in funding for many child safety regulators
- ensuring adequate and secure funding for offender prevention and intervention services for potential and existing offenders
- ensuring adequate and secure funding for support services, including a nation-wide support service to provide victims and survivors of child abuse with legal and related support in relation to the comprehensive range of legal issues that victims and survivors experience.

Children and young people in their own right

As noted on pages 8–9, Knowmore welcomes the consultation paper’s recognition of ‘children and young people as victim survivors of violence in their own right’.¹⁰⁸ We refer to our comments, on pages 10 to 12, elaborating on the nature and prevalence of violence against children.

We emphasise the Royal Commission’s findings that victims and survivors of child sexual abuse are often targeted for further abuse, in childhood and adulthood, by different perpetrators, and for emotional and physical abuse.¹⁰⁹ This illustrates the limitations of siloed approaches to addressing gender-based violence and child abuse. We make further comments about improving system integration on pages 67 to 72.

We know that victims and survivors experience significant challenges in navigating the complex and fragmented systems for accessing support. We are particularly concerned that these challenges are often heightened for children, whose appropriate support ‘often relie[s] on luck, persistent

¹⁰⁸ Consultation paper, p 33.

¹⁰⁹ Royal Commission, *Final report: volume 3, impacts*, p 140.

advocacy from a trusted adult, or informal networks of friends, teachers and neighbours'.¹¹⁰

In Knowmore's view, it is not enough for the Second Action Plan to 'recognise' children and young people as victims and survivors in their own right. The Second Action Plan must also include commitments to strengthen the protection of children's rights in practice. From our perspective as a nation-wide service, we particularly support the 'priorities to enable national reform' recommended by the Australian Human Rights Commission in 2024:

- establishing a National Taskforce for reform of child justice systems, reporting to ministers responsible for child justice and wellbeing across jurisdictions
- appointing a federal Cabinet Minister for Children, with responsibility for the human rights and wellbeing of children in Australia
- establishing a Ministerial Council for Child Wellbeing, reporting to the National Cabinet
- passing a National Children's Act and an Australian Human Rights Act to legally protect the human rights of children.¹¹¹

We consider that these reforms have significant potential to drive the coordinated, nation-wide action needed to improve child safety in practice.

Knowmore also considers that all states and territories should implement relevant reforms of a similar nature. For example, jurisdictions that do not have a Human Rights Act should adopt one, while jurisdictions that have a Human Rights Act should strengthen its protection of children's rights.¹¹²

¹¹⁰ Kate Fitzgibbon, *Silence and inaction: children and young people's experiences of violence and systemic failure in South Australia*, 2025, pp 9–11, <www.royalcommissiondfsv.sa.gov.au/_data/assets/pdf_file/0005/1167458/Silence-and-Inaction-Report-2025-Final.pdf>.

¹¹¹ Australian Human Rights Commission, *Help way earlier*, p 12, recommendations 1–4.

¹¹² See, for example, Knowmore, *Submission to the independent review of Queensland's Human Rights Act*, June 2024, pp 7–13, <<https://knowmore.org.au/wp-content/uploads/2024/06/submission-independent-review-human-rights-act-qld.pdf>>.

We particularly note the potential of including a participation duty and an equal access to justice duty for children in Human Rights Acts. This is consistent with recommendations of the Australian Parliament's Joint Committee on Human Rights and the model law proposed by the Australian Human Rights Commission.¹¹³

We have made comments, on pages 24 to 25 above, about the human right of children to participate in matters that affect them. Further to this, we share the comments of the Queensland Human Rights Commission in support a participation duty for children:

*... taking into account a child's views ensures that decisions are not solely based on adult assumptions, and can lead to better, more relevant and informed decisions about children ... explicit acknowledgement of a participation duty would provide clarity and standardise requirements for participation across all levels and areas of government.*¹¹⁴

We also note the Royal Commission's observation that 'where children do not feel listened to, they are less likely to report abuse'.¹¹⁵

In relation to an equal access to justice duty for children, the Australian Human Rights Commission recognised that:

The equal access to justice principle will complement the children's participation duty by requiring the provision of specialist children's

¹¹³ Australian Parliament, Parliamentary Joint Committee on Human Rights, *Inquiry into Australia's Human Rights Framework*, May 2024, p 310 – 312, recommendations 2 and 4, <https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Human_Rights/HumanRightsFramework/Report>; Australian Human Rights Commission, *Free and Equal: A Human Rights Act for Australia*, December 2022, p 17, <humanrights.gov.au/sites/default/files/free_equal_hra_2022_-_main_report_rgb_0_0.pdf>.

¹¹⁴ Queensland Human Rights Commission, *Strengthening the Human Rights Act: key issues paper*, June 2024, p 11.

¹¹⁵ Royal Commission, *Final report: volume 12, contemporary out-of-home care*, December 2017, p 182, <www.childabuseroyalcommission.gov.au/contemporary-out-home-care>.

*legal assistance, advocates and adjustments to court procedures to facilitate their participation in judicial proceedings.*¹¹⁶

We would emphasise that, while access to court processes are important, the legal and related needs of children extend well beyond this.¹¹⁷ In addition, access to justice extends beyond access to traditional legal options.

We recommend that the Second Action Plan include a commitment for the Australian Government to lead work with state and territory governments to better recognise children as victims and survivors of violence in their own right, and to strengthen the protection of children's human rights in practice. This should include a commitment for the Australian Government to:

- establish a National Taskforce for reform of child justice systems, reporting to ministers responsible for child justice and wellbeing across jurisdictions
- appoint a federal Cabinet Minister for Children, with responsibility for the human rights and wellbeing of children in Australia
- establish a Ministerial Council for Child Wellbeing, reporting to the National Cabinet
- pass a National Children's Act and an Australian Human Rights Act to legally protect the human rights of children.¹¹⁸

It should also include a commitment for the Australian Government to lead work with state and territory governments to implement reforms of a similar nature.

¹¹⁶ Australian Human Rights Commission, *Free and Equal: A Human Rights Act for Australia*, p 221.

¹¹⁷ See, for example, Law Council of Australia, *The Justice Project: final report, part 1, children and young people*, August 2018, pp 4–6, <lawcouncil.au/files/web-pdf/Justice%20Project/Final%20Report/Children%20and%20Young%20People%20%28Part%201%29.pdf>.

¹¹⁸ Australian Human Rights Commission, *Help way earlier*, p 12, recommendations 1–4.

Recommendation 7

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to better recognise children as victims and survivors of violence in their own right, and to strengthen the protection of children's human rights in practice. This should include a commitment for the Australian Government to:

- establish a National Taskforce for reform of child justice systems, reporting to ministers responsible for child justice and wellbeing across jurisdictions
- appoint a federal Cabinet Minister for Children, with responsibility for the human rights and wellbeing of children in Australia
- establish a Ministerial Council for Child Wellbeing, reporting to the National Cabinet
- pass a National Children's Act and an Australian Human Rights Act to legally protect the human rights of children.

It should also include a commitment for the Australian Government to lead work with state and territory governments to implement reforms of a similar nature.

People who use violence

After I survived the unthinkable, I wanted 2 things.

Firstly, I wanted to be uncontactable by the person who harmed me.

And secondly, I wanted the person who harmed me to get help so he wouldn't harm other children.

Reflections of Chris Coombes, Lived Experience Lead at Knowmore Legal Service

In Knowmore's view, the priorities of the Second Action Plan in relation to people who use violence should be preventing further violence, and providing safety, justice and healing for victims and survivors. We welcome the focus of the consultation paper on improving the evidence base to better inform the relevant responses.¹¹⁹

We have made detailed comments on pages 51 to 59 about improving the prevention of child abuse, including child sexual abuse. Many of these comments are also relevant for informing responses to people who use violence. Our recommendations to improve the prevention of child abuse will also:

- address the systemic inequalities that enable violence, marginalise victims and survivors, and protect people who use violence from accountability
- assist in identifying and responding to people who use violence
- reduce access to situations in which a person may choose to use violence
- support people who use violence to take accountability and stop using violence.

Our comments below address the complex and sensitive considerations that arise when a person who uses violence is also a survivor of violence themselves. The Royal Commission considered issues of this nature in relation to child sexual abuse. While recognising that 'the vast majority of child sexual abuse victims did not go on to commit crimes', the Royal Commission also identified 'common patterns in the lives of those survivors who were involved in criminal behaviour', with the criminal behaviour clearly reflecting the impacts of the abuse.¹²⁰

This is consistent with the observation of the consultation paper that 'there is a complex interplay between trauma, harmful substance use, mental health issues, gambling and violence against women and children and other forms of gender-based violence'.¹²¹ It is also consistent with our experience assisting victims and survivors of child abuse in prison –

¹¹⁹ Consultation paper, pp 48–49.

¹²⁰ Royal Commission, *Final report: volume 3, impacts*, pp 144–146.

¹²¹ Consultation paper, p 36.

survivors of violence,¹²² who in many cases, have also used violence themselves.

In our experience, victims and survivors in prison face very significant barriers to accessing safety, justice and healing. These include:

- the retraumatising and culturally unsafe nature of the prison environment¹²³
- inadequate access to counselling and psychological support¹²⁴
- inadequate access to cultural support¹²⁵
- limited availability and long wait times for rehabilitation programs¹²⁶
- inadequate support upon release, including release into insecure housing and homelessness.¹²⁷

We are concerned that these barriers to safety, justice and healing for victims and survivors in prison may contribute to a vicious cycle, characterised by further uses of violence, recriminalisation¹²⁸ and reimprisonment. We are also concerned about the disproportionate impact of these issues on victims and survivors who experience

¹²² The Royal Commission recognised that people in prison are significantly more likely than people in the general population to have experienced child sexual abuse. See Royal Commission, *Final report: volume 5, private sessions*, p 400, table P.13.

¹²³ Knowmore, *Supplementary submission to the Joint Standing Committee on Implementation of the National Redress Scheme: seventh year of the National Redress Scheme*, July 2024, pp 20–23, <knowmore.org.au/wp-content/uploads/2024/08/submission-joint-standing-committee-on-implementation-of-the-national-redress-scheme-seventh-year-cth.pdf>.

¹²⁴ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 160–161.

¹²⁵ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 160–161.

¹²⁶ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, p 170.

¹²⁷ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 165–166.

¹²⁸ The National Network of Formerly Incarcerated Women and Girls recommends using the term ‘recriminalisation’, rather than ‘recidivism’, recognising the impact of systemic factors. See National Network of Formerly Incarcerated Women and Girls, *Language Guide*, April 2025, p 7, <issuu.com/sistersinside/docs/language_guide_v2_2025>.

intersectional marginalisation, given the particular overrepresentation of First Nations survivors and survivors with disability in prison.¹²⁹

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to ensure that responses to people who use violence:

- are evidence-based
- prioritise preventing further violence, and providing safety, justice and healing for victims and survivors
- consider the complex and sensitive considerations that arise when a person who uses violence is also a survivor of violence themselves.

Recommendation 8

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to ensure that responses to people who use violence:

- are evidence-based
- prioritise preventing further violence, and providing safety, justice and healing for victims and survivors
- consider the complex and sensitive considerations that arise when a person who uses violence is also a survivor of violence themselves.

System integration and workforce

We note that the consultation paper proposes 'system integration and workforce' as a single priority area. In our comments below, we address system integration first, then workforce considerations.

¹²⁹ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2023, pp 45–46, <<https://knowmore.org.au/wp-content/uploads/2023/03/submission-joint-standing-committee-on-implementation-of-the-national-redress-scheme-cth.pdf>>.

System integration

As noted by the consultation paper:

Many people experiencing violence must navigate multiple systems at once, including health, housing, policing, justice, education, child protection and specialist services.¹³⁰

This is consistent with our experience assisting victims and survivors of child abuse. A striking feature of the systems and services for preventing and responding to gender-based violence is the significant inconsistencies between them. These inconsistencies affect many aspects of the relevant systems and services, including:

- the objectives that they are trying to achieve, and the weight placed on different objectives
- the legal frameworks and legal tests
- processes for seeking support
- approaches to assessing whether support is provided and if, so, at what level
- information-sharing arrangements
- impacts on other support options
- review options.

These inconsistencies contribute to significant complexity in the overall system, and additional barriers for children, victims and survivors seeking safety, justice and support. In our experience, victims and survivors often do not know the full range of support options relevant to them, and experience significant challenges in identifying which organisations to contact and in what order. The results for children, victims and survivors often include delayed responses, duplicated assessments and inconsistent decision-making. Too many people fall through the gaps and experience additional trauma.

¹³⁰ Consultation paper, p 50.

In relation to support services, the system is complex and fragmented, with fractures typically reflecting the limitations of funding arrangements.¹³¹ In our experience, this is a significant barrier to victims and survivors accessing the support they need. Victims' and survivors' understandings of their own experiences, rights and needs often do not align neatly with funding arrangements. Survivors often require assistance with a variety of issues that cannot be addressed by one support service, requiring referrals to multiple services. This reinforces the importance of integrated, multidisciplinary services that can provide holistic support, including systems navigation support.¹³²

The discussion above highlights the importance of closer integration of systems and services for preventing and responding to family and domestic violence, sexual violence and child abuse. We recognise the need, highlighted by the consultation paper, to differentiate between different forms of gender-based violence.¹³³ It is important to maintain and expand dedicated services – for example, services for children and survivors of child abuse. However, there is also a need to recognise the overlap between different forms of gender-based violence and avoid siloed approaches to the response (see pages 26 to 28 above).

The development and implementation of the Second Action Plan presents a valuable opportunity for the Australian Government to bring together diverse stakeholders and drive greater integration of systems and services. We consider that children, victims and survivors should receive a coordinated response regardless of where they live or which service they contact first. This requires stronger collaboration between systems and services, clearer accountability and shared responsibility for outcomes.

Particular attention should be given to transition points where children, victims and survivors are most likely to fall through gaps, including when moving between:

- support services for children and adults

¹³¹ See, for example, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 15–16.

¹³² See, Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, pp 123–125.

¹³³ Consultation paper, p 11.

- states and territories
- legal, therapeutic and other support systems.

Efforts to achieve greater integration of systems and services should prioritise support for children, victims and survivors who experience intersectional marginalisation and often face additional barriers to accessing support (see pages 24 to 25).

In our experience, a significant barrier to greater integration of systems and services is the inadequate funding of many services (see pages 76 to 77). Although funding applications that highlight collaboration between services are generally well-regarded, there is often little to no additional funding provided for the additional work that is often required to implement a successful collaborative project.

From our experience assisting victims and survivors, we know the value of navigation assistance and advocacy for people engaging with complex legal and support systems. The Justice Navigator Pilot, being led by the Victorian Government in partnership with Sexual Assault Services Victoria (SASVic), provides an example of how dedicated navigators can assist victims and survivors to understand their rights, access services, and engage with legal and related support processes in a coordinated and informed way.¹³⁴

The Australian Government has also announced a new service that will provide information, referrals and specialist service navigation for victims and survivors of child sexual abuse.¹³⁵ Despite this, there remain critical gaps in navigation support for children, and survivors of non-sexual child abuse or multi-type maltreatment (see page 9). There also remain critical

¹³⁴ See, Hon Ben Carroll MP, *National Rollout Of Sexual Violence Legal Services Pilot Now Complete*, 18 May 2026, accessed 30 July 2026, <<https://www.premier.vic.gov.au/national-rollout-sexual-violence-legal-services-pilot-now-complete>>; Sexual Assault Services Victoria, *The first sites to pilot Victoria's Justice Navigator roles*, accessed 30 July 2026, <<https://sasvic.org.au/justice-navigators/>>.

¹³⁵ The Hon. Michelle Rowland MP, *National information and referral service for victims and survivors of child sexual abuse*, 14 July 2026, <ministers.ag.gov.au/media-centre/national-information-and-referral-service-victims-and-survivors-child-sexual-abuse-14-07-2026>.

gaps in support for victims and survivors of child abuse in relation to:

- social work, counselling, cultural support and financial counselling in relation to civil claims
- independent legal support in relation to criminal legal processes (see pages 47–48).

We also note the potential of reporting hubs as a model for providing victims and survivors with integrated support. The WA Office of the Commissioner for Victims of Crime has described reporting hubs as follows:

*The reporting hubs include services for sexual offending victim-survivors in one location. This may include police, forensic specialist counselling and legal services. The aim of hubs is to provide a wraparound response for sexual offending victim-survivors, making it easier for them to get the help they need without having to go to lots of separate places and re-tell their story to a new person each time. All staff working in these hubs are specially trained to work with victim-survivors of sexual offending and provide trauma-informed services.*¹³⁶

Knowmore has some experience of reporting hubs in Victoria, called Multidisciplinary Centres (MDCs). Generally, we have received positive feedback from victims and survivors about their experiences in reporting child sexual abuse to the police at MDCs. Consistent with the description of reporting hubs above, the police staff at MDCs are specialists in sexual offences and child abuse.¹³⁷ Our clients generally report that these specialist police are well informed about child sexual abuse and that this has helped them to feel immediately believed when reporting the abuse to

¹³⁶ Office of the Commissioner for Victims of Crime (Western Australia), *Review of criminal justice system responses to sexual offending: discussion paper 2, reporting sexual offences*, 2023, p 14, <www.wa.gov.au/organisation/departments/department-of-justice/commissioner-victims-of-crime/review-of-criminal-justice-responses-sexual-offending>.

¹³⁷ Victoria Police, *Multidisciplinary centres*, 21 December 2021, accessed 27 July 2026, <www.police.vic.gov.au/options-guide-victim-survivors-victoria-police-perpetrated-family-violence-or-sexual-offences/reporting-in-person-at-mdcs>.

the police, establishing the foundation for a positive experience of the investigation process.

We note the parallels between our clients' experiences of MDCs in Victoria and the findings of the Australian Centre for Child Protection in its evaluation of Perth reporting hubs in 2017. The evaluation found that 'police investigations and child protection responses were faster under the [reporting hub] model and that staff and caregivers felt that the service provided a more victim-centred approach for children and families'.¹³⁸ In Knowmore's view, reporting hubs have significant potential to reduce barriers to reporting child abuse, reduce barriers to accessing support and reduce the risk of further harm to victims and survivors in their interactions with the police, child protection agencies and support services.

We recommend that the Second Action Plan include a commitment for the Australian Government to lead work with state and territory governments to drive greater integration of systems and services for preventing and responding to family and domestic violence, sexual violence and child abuse. This should include:

- providing adequate funding for support services to undertake collaborative work, recognising the additional work that is often required to implement a successful collaborative project
- ensuring that systems navigation services are available to all children and survivors of child abuse
- ensuring that reporting hubs are available to all victims and survivors of child abuse
- maintaining and expanding dedicated services for children and survivors of child abuse.

¹³⁸ Office of the Commissioner for Victims of Crime (Western Australia), *Review of criminal justice system responses to sexual offending: discussion paper 2, reporting sexual offences*, p 15.

Recommendation 9

The Second Action Plan should include a commitment for the Australian Government to lead work with state and territory governments to drive greater integration of systems and services for preventing and responding to family and domestic violence, sexual violence and child abuse. This should include:

- providing adequate funding for support services to undertake collaborative work, recognising the additional work that is often required to implement a successful collaborative project
- ensuring that systems navigation services are available to all children and survivors of child abuse
- ensuring that reporting hubs are available to all victims and survivors of child abuse
- maintaining and expanding dedicated services for children and survivors of child abuse.

Workforce considerations

We note that the consultation paper identifies, as a key opportunity for the Second Action Plan, ‘strengthen[ing] support for the workforces engaged in prevention, early intervention, response and recovery, recognising the risk of vicarious trauma’.¹³⁹ Knowmore welcomes this opportunity.

An independent review of the NRS recognised that it takes ‘time, effort and skill’ to provide appropriate support to victims and survivors of child sexual abuse.¹⁴⁰ In the case of our work providing legal and related support, the skills required across our organisation are both highly diverse and specific. These skills derive from tertiary education, lived experience, cultural knowledge and experience in community-based work. The diversity and

¹³⁹ Consultation paper, p 50.

¹⁴⁰ R Kruk AO, *Final report: second year review of the National Redress Scheme*, March 2021, p 208, <www.nationalredress.gov.au/sites/default/files/documents/2024-08/final-report-second-year-review-national-redress-scheme.pdf>.

sophistication of skills required is illustrated by the reflections of our staff on pages 44 to 46.

Knowmore recognises the importance of appropriate regulation in preventing and responding to child abuse. At the same time, we note that the regulatory environment for this work is complex. For example, our organisation and workforce are required to comply with, or otherwise have regard to:

- differing laws and regulations in all 9 Australian jurisdictions (all states and territories, and the federal jurisdictions)
- differing professional codes
- differing funding agreements (see appendix 1)
- requirements of the National Accreditation Scheme administered by Community Legal Centres Australia.

This regulatory environment requires significant skill to navigate, which should be appropriately recognised.¹⁴¹ In light of these factors, we are concerned by the long-term and ongoing undervaluation of work to prevent and respond to violence against women and children, which is closely related to the inadequate and insecure funding of many support services. Addressing these issues is necessary for further building safe and skilled workforces. We make further comments about these issues below. We also make comments about our capability development service, which we share as a model for consideration in the context of the Second Action Plan.

The undervaluation of work

Much of the work to prevent and respond to violence against women and children is covered by the *Social, Community, Home Care and Disability Services Industry Award 2010* (SCHADS Award), which outlines the minimum pay and conditions for the work. Almost all of Knowmore's staff

¹⁴¹ For more information about the complexity of the funding and regulatory environment of Knowmore's work, see Knowmore, *Submission to the Fair Work Commission on gender-based undervaluation – priority awards review – Social, Community, Home Care and Disability Services Industry Award*, 5 September 2025, pp 2-4, <<https://www.fwc.gov.au/documents/sites/am2024-19/am202421-sub-cls-080925.pdf>>.

are engaged to work under our enterprise agreement.¹⁴² Our enterprise agreement is linked to the SCHADS Award in significant respects, including with regard to employees' classification and minimum rates of pay.¹⁴³

The SCHADS Award has been affected by recent decisions of the Fair Work Commission, with flow-on effects for the workforce. In April 2025, the Fair Work Commission made an initial decision, recognising that workers covered by the SCHADS Award have historically received wages that reflect undervaluation on the basis of gender.¹⁴⁴ While Knowmore welcomed this recognition, we were concerned that the Fair Work Commission's proposed response would worsen the situation, introducing changes that would lead to reduced pay and diminished recognition for many community-based roles.¹⁴⁵

In June 2026, the Fair Work Commission made a further decision. Knowmore's preliminary view is that the June 2026 decision improves on the Fair Work Commission's proposed response from the April 2025 decision. However, the decision is complex and it remains to be seen what the impact will be in practice.¹⁴⁶ We are particularly concerned about how the decision will impact financial counsellors,¹⁴⁷ whose work is critical to supporting victims and survivors (see the reflections of Knowmore's

¹⁴² Knowmore *Legal Service Enterprise Agreement 2023–27*, 15 December 2023, clause 1.2(b), <<https://www.fwc.gov.au/document-view/agreements/knowmore-legal-service-enterprise-agreement-2023-2027>>.

¹⁴³ Knowmore, *Submission to the Fair Work Commission on gender-based undervaluation – priority awards review – Social, Community, Home Care and Disability Services Industry Award*, pp 3–4, paragraph 17.

¹⁴⁴ Fair Work Commission, *Decision: gender-based undervaluation – priority awards review*, 16 April 2025, p 17, paragraph 16, <<https://www.fwc.gov.au/documents/decisionssigned/pdf/2025fwcfb74.pdf>>.

¹⁴⁵ Knowmore, *Submission to the Fair Work Commission on gender-based undervaluation – priority awards review – Social, Community, Home Care and Disability Services Industry Award*, p 4.

¹⁴⁶ See, for example, NSW Council of Social Service (NCOSS), *Fair Work Commission landmark decision on the SCHADS Award*, June 2026, accessed 27 July 2026, <ncoss.org.au/news/media-releases-news/fair-work-commission-landmark-decision-on-the-schads-award/>.

¹⁴⁷ See Financial counselling peak associations, *Submission on the Fair Work Commission's decision of 1 June 2026 on the gender-based undervaluation – priority awards review*, June 2026, p 2, <fcvic.org.au/wp-content/uploads/202606_FC-Submission-to-FWC-Decision-FINAL_with-cover-sheet.pdf>.

Manager Financial Counselling on page 46 above). We remain concerned that work to prevent and respond to violence against women and children will continue to be undervalued, contributing to ongoing challenges in recruiting and retaining suitably skilled staff.¹⁴⁸

Given that the SCHADS Award applies nation-wide, the Second Action Plan should include a commitment for the Australian Government to ensure that work to prevent and respond to violence against women and children is appropriately valued in light of its complexity and social importance. In doing this, the Australian Government should take into account:

- the need to recruit and retain suitably skilled staff
- the pay and conditions of equivalent roles in the government and private sectors
- the importance not only of formal qualifications, but also of lived experience, cultural knowledge and experience in community-based work
- the gender-based undervaluation of relevant work.

¹⁴⁸ Knowmore, *Submission to the Fair Work Commission on gender-based undervaluation – priority awards review – Social, Community, Home Care and Disability Services Industry Award*, pp 6 to 7, paragraphs 33 to 35; Knowmore, *Submission to the National Legal Assistance Partnership Review*, November 2023, p 7, <knowmore.org.au/wp-content/uploads/2024/01/submission-national-legal-assistance-partnership-review-cth.pdf>.

Recommendation 10

The Second Action Plan should include a commitment for the Australian Government to ensure that work to prevent and respond to violence against women and children is appropriately valued in light of its complexity and social importance. In doing this, the Australian Government should take into account:

- the need to recruit and retain suitably skilled staff
- the pay and conditions of equivalent roles in the government and private sectors
- the importance not only of formal qualifications, but also of lived experience, cultural knowledge and experience in community-based work
- the gender-based undervaluation of relevant work.

Inadequate and insecure funding

The undervaluation of the workforce is closely related to the undervaluation of organisations providing support services for victims and survivors. In our experience, the support service system is persistently stretched to its limit, with services not adequately funded to meet demand.¹⁴⁹ This often results in long wait times for appointments, during which victims and survivors may disengage. Funding is often not indexed to the increasing costs of service delivery with inflation. Funding is also often provided on a short-term basis, with little notice of funding changes. This limits the ability of support services to plan for the future, including by offering ongoing employment or investing in the professional development of staff.

As a result of these factors, many support services are required to undertake significant funding advocacy, diverting resources from service delivery. These factors also risk triggering a 'race to the bottom' on staff pay and conditions, as many organisations have little choice but to

¹⁴⁹ See, for example, *Submission to the Joint Standing Committee on the National Redress Scheme*, February 2026, pp 143–150.

compete for limited pools of funding. This is to the disadvantage of organisations that wish to maintain appropriate pay and conditions, and reinforces the importance of a strong SCHADS Award (see pages 73 to 76 above).

Support services need adequate funding to recruit, train and retain staff with appropriate skills, and to allow staff adequate time with each client to provide appropriate support. In doing this work, there is a heightened risk of vicarious trauma and burnout for staff, which organisations must be resourced to manage.¹⁵⁰

We recommend that the Second Action Plan include a commitment for the Australian Government, and state and territory governments, to ensure that support services have adequate and secure funding. This must include:

- a realistic assessment of the demand for the service
- indexation to reflect the increasing costs of delivering services
- funding terms of at least 5 years
- at least 12 months' notice of any funding decrease.

Recommendation 11

The Second Action Plan should include a commitment for the Australian Government, and state and territory governments, to ensure that support services have adequate and secure funding. This must include:

- a realistic assessment of the demand for the service
- indexation to reflect the increasing costs of delivering services
- funding terms of at least 5 years
- at least 12 months' notice of any funding decrease.

¹⁵⁰ See R Kruk AO, *Final report: Second year review of the National Redress Scheme*, pp 174-178.

A model for capability development

As highlighted by our comments on pages 31 to 34 and 41 to 46, Knowmore has developed significant organisational capability over 13 years of providing legal and related support to victims and survivors of child abuse, reflected in the diverse and sophisticated skills of staff. Our work includes a capability development service, funded by the Department of Social Services.

Through our capability development service, Knowmore provides training, legal advice, support and guidance to redress support services, so they can better support victims and survivors engaging with the NRS process. In doing so, our capability development service leverages our organisational capability and our strong relationships with community-based organisations to build the capability of redress support services in navigating legal and related processes. This benefits survivors and the community at scale.

We recommend that, in developing the Second Action Plan, the Department of Social Services should consider Knowmore's capability development service as a model that has significant potential to further strengthen and support the workforces engaged in preventing and responding to violence against women and children.

Recommendation 12

In developing the Second Action Plan, the Department of Social Services should consider Knowmore's capability development service as a model that has significant potential to further strengthen and support the workforces engaged in preventing and responding to violence against women and children.

Appendix 1: about Knowmore

Our service

Knowmore legal service (Knowmore) is a nation-wide, free and independent community legal centre providing legal information, advice, representation and referrals, education and systemic advocacy for victims and survivors of child abuse. Our vision is a community that is accountable to survivors and free of child abuse. Our aim is to facilitate access to justice for victims and survivors of child abuse and to work with survivors and their supporters to stop child abuse.

From 2013 to 2018, our service assisted people who were engaging with or considering engaging with the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission). From 1 July 2018, Knowmore has delivered legal support services to assist survivors of institutional child sexual abuse to access their redress options, including under the National Redress Scheme (NRS). Knowmore also delivers financial counselling services to people participating in the NRS, and works with other services in the NRS support network to support and build their capability. Since 2022, Knowmore has assisted survivors who experienced child sexual abuse in non-institutional settings, and provided legal and financial counselling support to people engaging with the Territories Stolen Generations Redress Scheme (Territories Redress Scheme). Since 2025, Knowmore has also been providing legal support to people who have received a redress offer from the Western Australian Stolen Generations Redress Scheme.

Knowmore uses a multidisciplinary model to provide trauma-informed, client-centred and culturally safe legal assistance to clients. Knowmore has offices in Sydney, Melbourne, Brisbane, Perth, Adelaide and Darwin. Our service model brings together lawyers, social workers and counsellors, Aboriginal and Torres Strait Islander engagement advisors and financial counsellors to provide coordinated support to clients.

Knowmore is funded by the Commonwealth Government, represented by the Departments of Attorney-General and Social Services and the National Indigenous Australians Agency, and the Western Australian Government.

Our clients

In our Royal Commission-related work, from July 2013 to the end of March 2018, Knowmore assisted 8,954 individual clients. The majority of those clients were survivors of institutional child sexual abuse. Almost a quarter (24%) of the clients assisted during our Royal Commission work identified as Aboriginal and/or Torres Strait Islander peoples.

Since the commencement of the National Redress Scheme for survivors of institutional child sexual abuse on 1 July 2018 to 30 June 2026, Knowmore has received 256,697 calls to its 1800 telephone line and has completed intake processes for, and has assisted or is currently assisting, 27,083 clients. 2 in 5 clients (40%) identify as Aboriginal and/or Torres Strait Islander peoples. About 1 in 10 clients (9%) are classified as priority clients due to advanced age and/or immediate and serious health concerns including terminal cancer or other life-limiting illness.

100% of clients we assist with the Territories Redress Scheme identify as Aboriginal and/or Torres Strait Islander peoples.

Appendix 2: legal issues experienced by victims and survivors

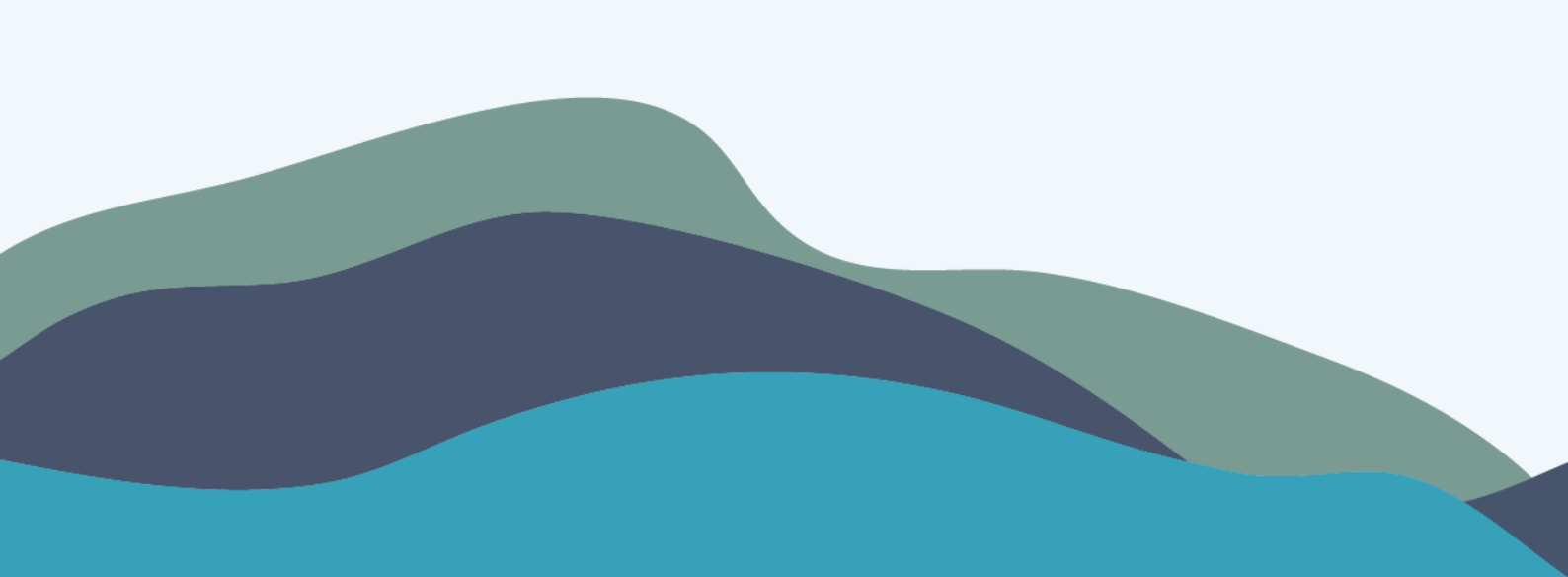
In the report on a systemic inquiry into victim participation in the justice system in November 2023, the Victorian Victims of Crime Commissioner identified the following matters that a comprehensive legal service for victims and survivors of crime could assist with. The list is illustrative, not exhaustive.¹⁵¹

Victims' Charter rights and entitlements	ensuring victims receive information about an investigation and prosecution from relevant agencies, along with appropriate referrals to support consistent with their rights and entitlements under the Victims' Charter ensuring agencies consult with victims and seek their views at key parts of the process consistent with their rights and entitlements under the Victims' Charter
Reporting a crime, understanding charges, withdrawing or amending witness statements	• providing independent advice regarding making a statement to police • providing independent advice and liaising with police/prosecution to understand why charges are not filed or are withdrawn by police/prosecution and advising on any internal or external review processes¹⁷
Advocating for bail conditions that prioritise victim safety	• providing legal assistance to ensure that a prosecuting agency is aware of a victim's views about bail • if bail is granted, providing legal advice on bail conditions that are imposed to protect victims

¹⁵¹ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, November 2023, pp 373–375, <www.victimsofcrimecommissioner.vic.gov.au/media/lpufjx5h/silenced-and-sidelined_systemic-inquiry-into-victim-participation.pdf>.

Subpoenas and immunities	advocating for pre-trial applications, including reviewing application material and engaging legal representation¹⁸ to ensure victims' privacy and legal rights are respected in court
Giving evidence and alternative arrangements	advocating for alternative ways of giving evidence and ensuring these are provided by the court where relevant
Children as victim- witnesses	assisting children with their legal and Victims' Charter rights (as separate and distinct to those of a parent/ guardian)
Suppression Orders and the media	- advising a victim-survivor of sexual abuse or as a bereaved family member wishing to seek a Victim Privacy Notice - providing victims with legal advice relating to media intrusion or media engagement and any legal implications
Plea negotiations	- legal assistance to ensure the prosecution seeks the victim's views during certain prosecutorial decision-making processes - providing independent advice and liaising with the prosecution to understand plea decisions and advising on any internal or external review processes¹⁹
Sentence indications	assistance with ensuring the impact on a victim is considered at the sentence indication stage, including liaison with prosecution as necessary
Diversion	legal assistance to ensure that victims understand their participatory rights when diversion is recommended for an offender
Victim Impact Statements	- providing advice on the admissibility of a VIS - legal assistance where the defence applies to question a victim on the contents of their VIS

Cases of perpetrator misidentification/systems abuse	• legal assistance where a victim is incorrectly identified as the offender/respondent, particularly in family violence or stalking matters
Coronial matters	• applying for leave to appear as an interested party in a coronial proceeding and preparing submissions
Victim Right to Review scheme	• if implemented (see Recommendation 4) advising a victim about and applying to the Right to Review scheme
Mental impairment decisions, parole and other post-sentencing decisions	• being heard in relation to certain treatment matters where a person has been found not guilty or unfit to stand trial due to mental impairment under the <i>Crimes (Mental Impairment and Unfitness to be Tried Act 1997</i> (Vic) • understanding rights and entitlements relating to the Victims Register, and legal assistance with making submissions to the Adult Parole Board²⁰ • understanding rights and entitlements relating to post-sentencing decisions, and legal assistance with making submissions to the Post Sentence Authority.²¹
Restorative justice	• advising victims about entitlements to seek a restorative justice process • providing legal advice to victims about any legal ramifications of participation in a restorative justice process.



Knowmore

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