



National Strategy to Prevent and Respond to Child Sexual Abuse – Second Action Plan

Submission to the
National Office for Child
Safety

31 July 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 child abuse are nation-wide problems that require national leadership to address. The Australian Government should lead a coordinated, national approach to preventing and responding to child abuse, 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.
- Work to prevent and respond to child abuse 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.
- Harmful sexual behaviours by children raise complex and sensitive considerations. The Australian Government should lead work to maintain and build upon a public health approach to harmful sexual behaviours, involving early action, assessment and help to access therapeutic intervention.
- Online child abuse is widespread and increasing, with technology evolving rapidly and the law struggling to keep up. The Second Action Plan presents an opportunity to change the dynamic. The Australian Government should lead work to improve how Australia prevents and responds to online child abuse.

Table of Contents

Acknowledgement of Country	2
Content note	2
Reflections of Chris Coombes and Barbara Charan (Fernandez)	3
Summary of Knowmore's submission	4
Introduction	7
List of recommendations	12
Part 1: general comments relevant to the consultation as a whole	20
Terms used in this submission	20
The importance of lived experience	21
The 'tell us once' approach	24
Part 2: key recommendations for the Second Action Plan	25
The need for national leadership	25
A nation-wide legal and related support service	27
Part 3: focus areas for the consultation	46
Empowering victims, survivors and their support networks	46
Building skilled and safe workforces	49
Preventing offending before it occurs and strengthening offender detection and response	56
Improving responses to children and young people who display harmful sexual behaviours	66
Addressing online child sexual abuse and online harms	74

Appendix 1: about Knowmore _____ 82

Our service _____82

Our clients _____83

Appendix 2: legal issues experienced by victims and survivors _____ 84

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 for victims and survivors of child abuse, Knowmore has a deep appreciation of the importance of the National Strategy to Prevent and Respond to Child Sexual Abuse (National Strategy), as well as a keen understanding of the priorities for further action.

Knowmore is proud to have played a significant role in the development and implementation of the National Strategy. This began with our contributions to the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission), which made detailed recommendations for improving child safety.² Knowmore has persistently advocated for the implementation of the Royal Commission's recommendations, including the recommendations for a national strategy,³ relevant to all children and survivors of child sexual abuse.

In 2021 and 2022, we contributed to the consultations by the National Office for Child Safety (National Office) about the National Strategy and the Advisory Group respectively.⁴ Since 2022, we have also delivered the expanded 'national specialist trauma-informed legal service' under the First Commonwealth Action Plan.⁵ As part of this service, we provide legal and related support to victims and survivors of child sexual abuse, including victims and survivors who experienced abuse in family or community settings (for more information about our service, see appendix 1).

² See Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission), *Final report: volume 6, making institutions child safe*, December 2017, pp 22–34, <www.childabuseroyalcommission.gov.au/making-institutions-child-safe>.

³ Knowmore, *Submission on the National Strategy to Prevent Child Sexual Abuse*, April 2021, p 1, <knowmore.org.au/wp-content/uploads/2022/04/submission-national-strategy-to-prevent-child-sexual-abuse-cth.pdf>; Royal Commission, *Final report: volume 6, making institutions child safe*, pp 107–108, recommendations 6.1–6.3.

⁴ Knowmore, *Submission on the National Strategy to Prevent Child Sexual Abuse*; Knowmore, *Submission on the National Strategy Advisory Group*, February 2022, <knowmore.org.au/wp-content/uploads/2022/04/submission-national-strategy-advisory-group-cth.pdf>.

⁵ See National Office for Child Safety, *First Commonwealth Action Plan to Prevent and Respond to Child Sexual Abuse 2021–2024*, September 2021, p 32, item 8, <www.childsafety.gov.au/resources/first-commonwealth-action-plan-prevent-and-respond-child-sexual-abuse-2021-2024>.

Knowmore has partnered with the National Centre for Action on Child Sexual Abuse (National Centre) in delivering community legal education on navigating Australia's child safe laws.⁶ We have also continued our advocacy to improve laws, policies and practices impacting children and survivors of child sexual abuse in all Australian jurisdictions. In this way, we have made broad contributions to the implementation of the National Strategy, continuing to the present day.

Knowmore welcomes the National Office's proposal to 'continue the work already started under the National Strategy and introduce new activities in recognition of the emerging issues and information identified since the commencement of the First Action Plans'.⁷ The National Strategy and the First Action Plans have provided a strong foundation for preventing and responding appropriately to child sexual abuse. The Second Action Plan presents an opportunity to build upon this in meaningful ways.⁸

While acknowledging the broad range of matters noted by the consultation paper for the Second Action Plan (consultation paper),⁹ we particularly wish to highlight the following:

- **Child abuse, including child sexual abuse, is widespread.** More than 3 in 5 people in Australia (62.2%) have experienced child abuse. More than 1 in 4 people in Australia (28.5%) who have experienced child

⁶ National Centre for Action on Child Sexual Abuse and Knowmore, *Navigating Australia's child safe legislation*, September 2025, <www.youtube.com/watch?v=QQCTHef2I3g>.

⁷ 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 21 July 2026, <consultations.ag.gov.au/rights-and-protections/nocs-community-survey/>.

⁸ In this submission, we have used the term 'Second Action Plan' for consistency with the consultation paper. We intend this term to include both a Second National Action Plan and a Second Commonwealth Action Plan. For further discussion of the terms used in this submission, see pages 20 to 21.

⁹ Australian Government, Attorney-General's Department and the National Office for Child Safety, *Second Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: public consultation paper* (Consultation paper), May 2026, <consultations.ag.gov.au/rights-and-protections/nocs-community-survey/user_uploads/nocs-second-action-plan-consultation-paper.pdf>.

sexual abuse.¹⁰ This indicates that many millions of people in Australia have experienced child abuse, including child sexual abuse.¹¹

- **The majority of victims and survivors of child sexual abuse experienced the abuse in family or community settings.**¹² The most commonly involving harmful sexual behaviours by known adolescents under the age of 18, or child sexual abuse perpetrated by parents or other adult parent-like caregivers within the home¹³
- **There are continuing, systemic failures to protect children from sexual abuse, including in institutions.** This has been highlighted relation to the early childhood education and care sector by many media reports and inquiries over the past 12 months¹⁴
- **We are approaching the end of the National Redress Scheme for victims and survivors of institutional child sexual abuse.**¹⁵ This will increase the role played by civil law claims for compensation, redress schemes provided by institutions and victims' support schemes. It will also impact the effectiveness of a siloed approach to

¹⁰ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, 2023, p 17, <<https://www.acms.au/resources/the-prevalence-and-impact-of-child-maltreatment-in-australia-findings-from-acms-2023-brief-report%2F>>.

¹¹ Australia's population was 27,801,023 people at 31 December 2025. See Australian Bureau of Statistics, *National, state and territory population*, June 2026, <www.abs.gov.au/statistics/people/population/national-state-and-territory-population/latest-release>.

¹² 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>>.

¹³ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 17.

¹⁴ See, Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, 20 February 2026, p 186, <knowmore.org.au/wp-content/uploads/2026/03/submission-joint-standing-committee-on-implementation-of-the-national-redress-scheme.pdf>.

¹⁵ The deadline for applications to the National Redress Scheme is 30 June 2027. The National Redress Scheme will end on 1 July 2028. See *National Redress Scheme for Institutional Child Sexual Abuse Act 2018* (Cth) (NRS Act), sections 20(1)(e) and 193(1).

providing services, depending on whether an experience of child sexual abuse occurred in an institutional or non-institutional setting (see the discussion on pages 37 to 40 below).

- **Technology is playing a growing role in relation to child sexual abuse.** We are concerned about the growing role of the internet, mobile phones, generative artificial intelligence (AI), online commercial platforms and financially-motivated online abuse.¹⁶ Almost 15% of children in Australia experience online sexual abuse (see the discussion on pages 74 to 81 below).¹⁷
- **Growing housing insecurity is also playing a role in relation to child sexual abuse.**¹⁸ This is reflected in the fact that children experiencing homelessness are more likely to experience child sexual abuse,¹⁹ and that child sexual abuse also contributes to unaccompanied child homelessness.²⁰

We agree with recent comments made by the National Strategy Advisory Group members that the Second Action Plan is ‘a critical opportunity to shift from fragmented responses to coordinated, evidence informed

¹⁶ Australian eSafety Commissioner, *Designing for safety: preventing child sexual exploitation and abuse online*, March 2026, pp 10–13, <www.esafety.gov.au/sites/default/files/2026-02/Designing-for-Safety_Preventing-child-sexual-exploitation-and-abuse-online_CSEA-toolkit.pdf>.

¹⁷ Timothy Cubitt et al., *AI- and non-AI online child sexual victimisation, disclosures and help seeking A national study of Australian adolescents*, 6 July 2026, p 31, <https://icmec.org.au/wp-content/uploads/2026/07/Cubitt_et_al_AI_and_non_AI_online_child-sexual_victimisation_disclosures_and_help_seeking.pdf>.

¹⁸ See National Housing Supply and Affordability Council, *State of the housing system 2026*, April 2026, p 3, <nhsac.gov.au/sites/nhsac.gov.au/files/2026-04/ar-state-housing-system-2026.pdf>.

¹⁹ NSW Government, Department of Education, *Homelessness in children and young people*, last updated 3 June 2026, <education.nsw.gov.au/schooling/school-community/child-protection/homelessness-in-children-and-young-people->.

²⁰ Homelessness Australia, *Child and youth homelessness*, accessed 21 July 2026, p 2, <homelessnessaustralia.org.au/wp-content/uploads/2023/04/HA-Child-and-youth-homelessness-fact-sheet-4.pdf>.

action’.²¹ A key recommendation of our submission is that the Second Action Plan should include an action item for the Australian Government to lead a coordinated, national approach to preventing and responding to child abuse, including child sexual abuse. This should connect to 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. 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.
- Second, we make comments about the need for the Australian Government to lead a coordinated, national approach to preventing and responding to child abuse, including child sexual abuse. This includes comments about the need to fund Knowmore as a nation-wide legal and related support service for victims and survivors.
- Third, we make comments about each 5 focus areas identified by the consultation paper.

List of recommendations

Recommendation 1

The Second Action Plan should include an action item for the Australian Government to lead a coordinated, national approach to preventing and responding to child abuse, including child sexual abuse.

²¹ National Strategy Advisory Group Members, *An open letter to the Australian Government and the Australian community*, May 2026, accessed 9 July 2026, p 1, <<https://samsn-org-au.assets.ionatahosting.net/uploads/2026/06/FINAL-public-letter-from-NSAG-re-2AP-May-2026-2.pdf>>.

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 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 action items 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 include an action item for the Australian Government to ensure that work to prevent and respond to child abuse 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 6

The Second Action Plan should include an action item 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 and the time required to deliver services to a professional standard
- 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 7

In developing the Second Action Plan, the National Office for Child Safety should consider Knowmore's capability development service as a model that has significant potential to further build skilled and safe workforces.

Recommendation 8

The Second Action Plan should include action items for the Australian Government to lead work with state and territory governments to develop and implement 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, and drive action to address the social conditions that enable child abuse.

Recommendation 9

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 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 10

The Second Action Plan include an action item for the Australian Government to lead work with state and territory governments to develop and implement a nationally consistent framework for preventing and responding to harmful sexual behaviours by children.

This framework should reflect the National Strategy's support for a public health model. This framework should also:

- establish common definitions, assessment tools, referral pathways, data collection standards and coordinated responses across jurisdictions
- drive greater investment in specialist therapeutic services for children with harmful sexual behaviours
- support further capability development of the workforce to prevent and respond to harmful sexual behaviours by children
- better support children who have been harmed, including legal advice and related support
- seek to expand victims' and survivors' access to restorative justice options, with appropriate safeguards.

Recommendation 11

In developing the Second Action Plan, the National Office for Child Safety should consider how Knowmore can contribute to the development and delivery of restorative justice options for people affected by harmful sexual behaviours, relevant policy, practitioner training and the design of restorative justice frameworks.

Recommendation 12

The Second Action Plan should include action items for the Australian Government to lead work internationally and with state and territory governments to improve how Australia prevents and responds to online child abuse. This should include:

- greater consistency and cooperation across jurisdictional borders
- ensuring that all victims and survivors of online child abuse have access to meaningful redress, justice-making and support options
- implementing a digital duty of care
- supporting the eSafety Commissioner to continue work to improve education and community awareness about online risks, and reporting mechanisms for online abuse and harmful content
- addressing the growing role of AI in child abuse
- considering whether to repeal the social media minimum age or change how it is implemented, taking into account the results of eSafety's comprehensive evaluation of the policy (once this is complete).

Part 1: 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.

Terms used in this submission

Knowmore recognises that people who have experienced child abuse 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, 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

In this submission, we have used the term 'Second Action Plan' for consistency with the consultation paper. We intend this term to include both:

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.

- a Second National Action Plan ('activities of shared national responsibility which are being delivered in partnership between Australian, state and territory Governments')²⁴
- a Second Commonwealth Action Plan ('activities of Australian Government responsibility which are being delivered primarily by Australian Government departments').²⁵

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 Office's acknowledgement in the consultation paper that:

*... victims and survivors have different life experiences and may have been subjected to multiple experiences of victimisation and discrimination. Responses to children, young people and adults need to listen and attend to this range of lived experiences. This may also include practitioners with lived experience of child sexual abuse.*²⁶

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 National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Third Annual Report 2025*, 22 April 2026, p 16, <www.childsafety.gov.au/resources/national-strategy-third-annual-report-2025>.

²⁵ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Third Annual Report 2025*, p 16.

²⁶ Australian Government, Attorney-General's Department and the National Office for Child Safety, Consultation paper, p 2.

experiences of those impacted at the centre of decision-making and helps to ensure that service systems are fit-for-purpose.²⁷

Human rights law recognises that all children have the right to participate in matters that affect them.²⁸ This includes participation, in an age-appropriate way, in decision-making about matters of child safety, wellbeing and justice.²⁹ For example, we note recent consultations that supported direct participation by children and young people by the Australian Human Rights Commission,³⁰ the Disability Royal Commission³¹ and the WA Commissioner for Children and Young People.³²

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 multiple forms of marginalisation and that these experiences may overlap to create additional barriers.³³

²⁷ See Knowmore, *Helping survivors advocate for change*, accessed 19 June 2026, <www.knowmore.org.au/leading-change/supporting-survivors/>.

²⁸ *Convention on the Rights of the Child*, article 12, <www.ohchr.org/sites/default/files/crc.pdf>.

²⁹ 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>.

³⁰ Australian Human Rights Commission, *'Help way earlier!': How Australia can transform child justice to improve safety and wellbeing*, June 2024, p 23, <humanrights.gov.au/sites/default/files/document/publication/1807_help_way_earlier_-_accessible_0.pdf>.

³¹ 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>.

³² 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>.

³³ See for example, United Nations Network on Racial Discrimination and Protection of Minorities, *Guidance Note on Intersectionality, Racial Discrimination and Protection of Minorities*, September 2022, p 3, <www.ohchr.org/sites/default/files/documents/issues/minorities/30th-anniversary/2022-09-22/GuidanceNoteonIntersectionality.pdf>.

Children who experience intersectional marginalisation are more likely to experience abuse. For example:

- The Australian Child Maltreatment Study reported that 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.³⁴ Gender diverse people are more likely to experience all forms of child abuse, including child sexual abuse.³⁵
- 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.³⁶
- Research conducted for the SA Royal Commission into Domestic, Family and Sexual Violence (SA 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.³⁷

This is consistent with our experience. Many of Knowmore's 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.³⁸

³⁴ See Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 17.

³⁵ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 21.

³⁶ 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>.

³⁷ 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>.

³⁸ For more information about who we assist, see appendix 1.

For further comments about the importance of lived experience, see pages 48 and 53.

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 Strategy.³⁹ 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’.⁴⁰ This reduces the barriers to participating in the consultations, including the risk 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 Department of Social Services about the Second Action Plan under the *National Plan to End Violence against Women and Children 2022–2032*. We intend to publish our submissions, and have no concerns about our submissions being shared for the purpose of informing the relevant consultations.

³⁹ 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*; 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/>>.

⁴⁰ Australian Government, Department of Social Services, *Consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022–2032)*.

Part 2: 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 an action item for the Australian Government to lead a coordinated, national approach to preventing and responding to child abuse, including child sexual abuse. This should connect to 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. 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 child abuse 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 25 to 26) and the regulatory environments for child safety (see pages 60 to 62).

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.⁴¹

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 Strategy.⁴² It has been emphasised by many reviews and inquiries, from the Royal Commission through to recent reviews.⁴³ 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).⁴⁴ 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'.⁴⁵ The Second Action Plan under the National Strategy presents an opportunity to strengthen this leadership.

⁴¹ 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>.

⁴² Royal Commission, *Final report: volume 6, making institutions child safe*, p 102.

⁴³ See, for example, Royal Commission, *Final report: volume 6, making institutions child safe*, pp 249–253; Australian Human Rights Commission, 'Help way earlier!': *How Australia can transform child justice to improve safety and wellbeing*, 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>.

⁴⁴ Australian Government, *Safe and supported: The National Framework for Protecting Australia's Children 2021–2031*, 2021, pp 2–3, <www.dss.gov.au/the-nationalframework-for-protecting-australias-children-2021-2031>.

⁴⁵ Australian Government, *Safe and supported: The National Framework for Protecting Australia's Children 2021–2031*, p 15.

Knowmore recommends that the Second Action Plan include an action item for the Australian Government to lead a coordinated, national response to preventing and responding to child abuse, including child sexual abuse.

Recommendation 1

The Second Action Plan should include an action item for the Australian Government to lead a coordinated, national approach to preventing and responding to child abuse, including child sexual abuse.

This should connect to an action item 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 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 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.

Our recommendation would involve the Second Action Plan continuing and expanding item 8 of the First Commonwealth Action Plan.⁴⁶ Under item 8, Knowmore expanded from assisting victims and survivors engaging with the National Redress Scheme to assisting all victims and survivors of child sexual abuse.⁴⁷ This includes victims and survivors who experienced child sexual abuse in family or community settings – the majority of victims and survivors of child sexual abuse (see page 10 above).⁴⁸

The funding connected with item 8 of the First Commonwealth Action Plan equips us to provide victims and survivors of child sexual abuse with legal and related support in relation to the following matters:

- state/territory government-based victims support schemes
- reporting child sexual abuse to the police
- compensation or restitution orders against offenders as part of a criminal law process
- providing information and referrals to private law firms to obtain advice on civil law processes
- accessing documents from government and/or non-government organisations
- speaking out about experiences of child abuse – for example, navigating defamation law issues.

We work with both children and adults. This involves making situation-specific assessments of the person's capacity. The Law Society of NSW

⁴⁶ National Office for Child Safety, *First Commonwealth Action Plan to Prevent and Respond to Child Sexual Abuse 2021–2024*, p 32.

⁴⁷ National Office for Child Safety, *First Commonwealth Action Plan to Prevent and Respond to Child Sexual Abuse 2021–2024*, p 32.

⁴⁸ Australian Child Maltreatment Study, *Main findings*; Ben Mathews et al., *Child sexual abuse by different classes and types of perpetrator: prevalence and trends from an Australian national survey*, p 5.

recognises that children regularly have the capacity to instruct a lawyer by the time they are 6- or 7-years old.⁴⁹ We consider what steps we can take to enhance a person's capacity,⁵⁰ which involves respectfully adjusting communication.⁵¹ 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 sexual 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 40 to 45), in practice, in the course of our funded work we naturally 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 for 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
- the importance of trauma-informed legal support
- the need to support all victims and survivors of child abuse, including child sexual abuse

⁴⁹ 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>.

⁵⁰ Law Society of NSW, *Representation principles for children's lawyers*, p 15, principle C2.

⁵¹ Law Society of NSW, *Representation principles for children's lawyers*, p 26–28, principle D6.

- 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

As the First Commonwealth Action Plan notes, item 8 relates to a similar recommendation from the Royal Commission (recommendation 9.4 from the Royal Commission's final report).⁵² This recommendation formed part of detailed comments made by the Royal Commission about the importance of a trauma-informed support service system for victims and survivors of child sexual abuse.⁵³ 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

⁵² National Office for Child Safety, *First Commonwealth Action Plan to Prevent and Respond to Child Sexual Abuse 2021–2024*, p 32, item 8; Royal Commission, *Final report: volume 9, advocacy, support and therapeutic treatment services*, December 2017, p 176, recommendation 9.4, <www.childabuseroyalcommission.gov.au/advocacy-support-and-therapeutic-treatment-services>.

⁵³ See Royal Commission, *Final report: volume 9, advocacy, support and therapeutic treatment services*, pp 9–14.

*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.*⁵⁴

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.*⁵⁵

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.*⁵⁶

The ALRC considered that:

⁵⁴ Royal Commission, *Final report: volume 9, advocacy, support and therapeutic treatment services*, p 175, recommendation 9.4.

⁵⁵ 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>.

⁵⁶ Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, 7 June 2024, p 12, <knowmore.org.au/wp-content/uploads/2024/06/submission-justice-responses-to-sexual-violence-cth.pdf>.

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 benefits to people who have experienced sexual violence and the community, and moving us closer to ending sexual violence.⁵⁷

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'.⁵⁸ 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 further harm (see page 29).

⁵⁷ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 64, paragraph 1.10.

⁵⁸ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 52.

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

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 31, 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.⁵⁹

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.⁶⁰

The Victorian Victims of Crime Commissioner recommended that the Victorian Government 'fund an enhanced victim support system in

⁵⁹ 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>.

⁶⁰ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 369 and 373.

Victoria⁶¹ 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’.⁶² 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 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.⁶³ 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).⁶⁴ In addition to those matters, the same comprehensive service should be funded to assist

⁶¹ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 362, recommendation 17.

⁶² Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 376, recommendation 21.

⁶³ See Knowmore, *Submission to the Australian Law Reform Commission Inquiry into justice responses to sexual violence*, pp 15–16; The Hon Michelle Rowland MP, *Expanded access to specialised and trauma-informed sexual violence legal services pilots in NSW and Qld*, 8 March 2026, <ministers.ag.gov.au/media-centre/expanded-access-specialised-and-trauma-informed-sexual-violence-legal-services-pilots-nsw-and-qld-08-03-2026>.

⁶⁴ Victorian Victims of Crime Commissioner, *Sidelined and silenced: Systemic inquiry into victim participation in the justice system*, p 373–375.

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 page 47).

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.

We envisage this to include systems navigation support. 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.⁶⁵

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.⁶⁶ Despite this, there remain critical gaps in navigation support for children, and survivors of non-sexual child abuse or multi-type maltreatment (see pages 39 to 40). There also remain

⁶⁵ Australian Government, Department of Social Services, *Justice navigator pilot for victim survivors of sexual assault*, last modified 9 December 2025, accessed 27 July 2026, <www.dss.gov.au/national-plan-end-violence-against-women-and-children/progress/first-action-plan-progress/first-action-plan-activities-addendum/justice-navigator-pilot-victim-survivors-sexual-assault>; Sexual Assault Services Victoria, *About us: about the Justice Navigator Pilot*, accessed 27 July 2026, <sasvic.org.au/about-us/justicenavigators/>.

⁶⁶ 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>.

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

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

Supporting all victims and survivors of child abuse

As noted on page 28, Knowmore expanded our service from assisting victims and survivors engaging with the National Redress Scheme to assisting all victims and survivors of child sexual abuse under item 8 of the First Commonwealth Action Plan. This expansion has laid the groundwork for a comprehensive service, moving away from a siloed approach to support depending on whether an experience of child abuse was in an institutional or non-institutional 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'.⁶⁷ 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'.⁶⁸ 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

⁶⁷ Royal Commission, *Terms of reference*, 13 November 2014, <www.childabuseroyalcommission.gov.au/terms-reference>.

⁶⁸ Royal Commission, *Terms of reference*.

*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.*⁶⁹

This aligns with our experience in delivering the expanded, trauma-informed legal service. 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,⁷⁰ it 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.

As noted on page 10, we are approaching the 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 2028.⁷¹ After this point, a siloed approach to providing support is

⁶⁹ Royal Commission, *Final report: volume 9, advocacy, support and therapeutic treatment services*, p 9.

⁷⁰ See generally Royal Commission, *Final report: volume 3, impacts*, December 2017, pp 73-156, <www.childabuseroyalcommission.gov.au/impacts>; 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>.

⁷¹ NRS Act, sections 20(1)(e) and 193(1).

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. 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, but also physical abuse, emotional abuse, neglect, exposure to domestic and family violence, and multi-type maltreatment (where a child experiences 2 or more different types of maltreatment).⁷² A comprehensive service of this nature would be appropriate for the following reasons:

- Child sexual abuse often occurs together with other forms of child abuse.⁷³ Victims and survivors of child sexual are often targeted for further abuse, including in childhood and adulthood, by different perpetrators, and for emotional and physical abuse.⁷⁴
- A comprehensive service could better assist victims and survivors of child sexual 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.⁷⁵ We also experience difficulties in getting victims' support schemes to recognise forms of abuse that were not crimes at the time they

⁷² 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.

⁷³ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 22.

⁷⁴ Royal Commission, *Final report: volume 3, impacts*, p 140.

⁷⁵ Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, pp 97–101.

occurred, or without evidence that the abuse caused a specific injury or loss.⁷⁶

- 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 sexual abuse, in addition to victims and survivors of child abuse more broadly. It is therefore a key recommendation of our submission that 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 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 focus area for the consultation on pages 46 to 49.

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 53 to 55.

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

⁷⁶ See, for example, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 49–50.

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 National Redress Scheme, 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. 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.⁷⁷

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,

⁷⁷ 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 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 knowmore, lawyers and counsellors collaborate to promote survivor-focussed practice.⁷⁸

The Australian Parliament's Joint Standing Committee on Implementation of the National Redress Scheme (Joint Standing Committee) also recognised that Knowmore 'is highly regarded for the quality of their work'.⁷⁹

The following reflections from Knowmore's staff illustrate the importance of a multidisciplinary model when assisting victims and survivors of child abuse. They 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 building safe and skilled workforces on pages 49 to 55.

⁷⁸ Stephen Winter, *Monetary Redress for Abuse in State Care*, section 12.3.

⁷⁹ 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>.

Recommendation 3

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

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

Part 3: focus areas for the consultation

We note that the consultation paper refers to the following 5 focus areas:

- empowering victims, survivors and their support networks
- building skilled and safe workforces
- preventing offending before it occurs and strengthening offender detection and response
- improving responses to children and young people who display harmful sexual behaviours
- addressing online child sexual abuse and online harms.⁸⁰

We make comments about each of these focus areas below.

Empowering victims, survivors and their support networks

The National Strategy and First Action Plans have laid a strong foundation for further empowering victims, survivors and their support networks. We note that the consultation paper highlights access to quality support and legal pathways.⁸¹ In Knowmore's view, these must be among the highest priorities for the Second Action Plan. We have made detailed comments about this on pages 46 to 49 above.

Previous reviews and inquiries have made detailed recommendations relevant to empowering victims, survivors and their support networks.⁸² We

⁸⁰ Australian Government, Attorney-General's Department and the National Office for Child Safety, Consultation paper, p 6.

⁸¹ Australian Government, Attorney-General's Department and the National Office for Child Safety, Consultation paper, p 6.

⁸² See, for example, Royal Commission, *Final report recommendations*, accessed 27 July 2026, <www.childabuseroyalcommission.gov.au/recommendations>; Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*.

do not repeat those recommendations in full here. Our comments below reflect our focus as a nation-wide service providing legal and related support to victims and survivors of child abuse. From this perspective, the most significant issues include:

- the inconsistencies in the justice-making and support options available to victims and survivors across different Australian jurisdictions (see the discussion on pages 25 to 26)
- 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 action items 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 Scheme⁸³
- implementing best practice in victims' support schemes, including in relation to eligibility, time limits, payment amounts, support options, application processes and review options⁸⁴
- 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 survivors⁸⁵

⁸³ See, Knowmore, *Submission to the Joint Standing Committee on the National Redress Scheme*, pp 189–191, recommendation 43.

⁸⁴ See, Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 47–49.

⁸⁵ 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 page 79 below)⁸⁶
- 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 survivors⁸⁷
- 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 (see pages 71 to 73)⁸⁸
- addressing barriers to victims and survivors reporting child abuse to the police⁸⁹
- providing victims and survivors with a right to be heard in relation to all parts of the criminal legal process⁹⁰
- expanding the role of lived experience in decision-making and ensuring it is appropriately valued (see pages 21-22)
- 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.⁹¹

⁸⁶ See, Knowmore, *Submission on the quality and safety of Australia’s early childhood education and care system*, pp 32-34, recommendation 7.

⁸⁷ See, Knowmore, *Speaking out*, accessed 29 July 2026, <<https://knowmore.org.au/for-survivors/speaking-out/>>.

⁸⁸ See, Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, pp 43-45, recommendations 17 and 18.

⁸⁹ See, Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, pp 21-28.

⁹⁰ 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>>.

⁹¹ See, Australian Government, Department of Social Services, *National Plan to End Violence against Women and Children 2022–2032* (National Plan), p 86-88, accessed 30 July 2026, <<https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf>>.

Recommendation 4

The Second Action Plan should include action items 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.

Building skilled and safe workforces

Knowmore welcomes the consultation paper's focus on building skilled and safe workforces.⁹² An independent review of the National Redress Scheme

⁹² Australian Government, Attorney-General's Department and the National Office for Child Safety, Consultation paper, p 6.

recognised that it takes ‘time, effort and skill’ to provide appropriate support to victims and survivors of child sexual abuse.⁹³ 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 sophistication of skills required is illustrated by the reflections of our staff on pages 42 to 45.

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.⁹⁴

In light of these factors, we are concerned by the long-term and ongoing undervaluation of work to prevent and respond to child abuse, 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

⁹³ 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>.

⁹⁴ 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*, September 2025, pp 2 to 4, <www.fwc.gov.au/documents/sites/am2024-19/am202421-sub-cls-080925.pdf>.

we share as a model for consideration in the context of the Second Action Plan.

We note that the consultation paper also refers to ‘continu[ing] to reform the Working with Children Check system and strengthen national information sharing’ in the context of building safe and skilled workforces. We make further comments about these matters on pages 61 to 66.⁹⁵

The undervaluation of work

Much of the work to prevent and respond to child abuse 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 are engaged to work under our enterprise agreement.⁹⁶ Our enterprise agreement is linked to the SCHADS Award in significant respects, including with regard to employees’ classification and minimum rates of pay.⁹⁷

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.⁹⁸ 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

⁹⁵ Australian Government, Attorney-General’s Department and the National Office for Child Safety, Consultation paper, p 6.

⁹⁶ *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>>.

⁹⁷ 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 3–4, paragraph 17, <<https://www.fwc.gov.au/documents/sites/am2024-19/am202421-sub-cls-080925.pdf>>.

⁹⁸ 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>>.

to reduced pay and diminished recognition for many community-based roles.⁹⁹

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.¹⁰⁰ We are particularly concerned about how the decision will impact financial counsellors,¹⁰¹ whose work is critical to supporting victims and survivors (see the reflections of Knowmore's Manager Financial Counselling on page 45 above). We remain concerned that work to prevent and respond to child abuse will continue to be undervalued, contributing to ongoing challenges in recruiting and retaining suitably skilled staff.¹⁰²

Given that the SCHADS Award applies nation-wide, the Second Action Plan should include an action item for the Australian Government to ensure that work to prevent and respond to child abuse 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

⁹⁹ 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.

¹⁰⁰ 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/>.

¹⁰¹ 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>.

¹⁰² 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>.

- 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 5

The Second Action Plan should include an action item for the Australian Government to ensure that work to prevent and respond to child abuse 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 of child abuse. In our experience, the support service system is persistently stretched to its limit, with services not adequately funded to meet demand.¹⁰³ This often results in long wait times for appointments, during which victims and survivors may disengage. Our experience is also that the complexity of service delivery is increasing – in part, due to the

¹⁰³ See, for example, Knowmore, *Submission to the Joint Standing Committee on Implementation of the National Redress Scheme*, pp 143–150.

intersecting impact of issues such as poverty, homelessness and mental illness.

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 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 for skilled and safe workforces (see pages 49 to 53 above).

Support services need adequate funding to recruit, train and retain staff with appropriate skills, and to allow staff adequate time with each survivor 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.¹⁰⁴

We recommend that the Second Action Plan include an action item 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 and the time required to deliver services to a professional standard
- 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.

¹⁰⁴ See R Kruk AO, *Final report: Second year review of the National Redress Scheme*, pp 174-178.

Recommendation 6

The Second Action Plan should include an action item 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 and the time required to deliver services to a professional standard
- 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.

A model for capability development

As highlighted by our comments on pages 27 and 45, 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, which is funded by the Australian Government through 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 National Redress Scheme 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 National Office for Child Safety should consider Knowmore's capability development service as a model that has significant potential to further build skilled and safe workforces.

Recommendation 7

In developing the Second Action Plan, the National Office for Child Safety should consider Knowmore's capability development service as a model that has significant potential to further build skilled and safe workforces.

Preventing offending before it occurs and strengthening offender detection and response

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 under the First Action Plans to prevent offending before it occurs and to strengthen offender detection and response.¹⁰⁵ 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

¹⁰⁵ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Third Annual Report 2025*, pp 73–93; 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>>.

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 abuse, some types of sexual abuse, and exposure to domestic violence. And new types of sexual victimisation are also emerging.¹⁰⁶

As highlighted by our comments on pages 9 to 11, both child abuse broadly and child sexual abuse specifically remain prevalent in Australian society, with continuing systemic failures to protect children from abuse. In relation to child sexual abuse specifically, 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’.¹⁰⁷ We also note that online child sexual abuse is widespread and increasing.¹⁰⁸ We make further comments about harmful sexual behaviours by children and online child sexual abuse in relation to the relevant focus areas on pages 66 to 74 and 74 to 81 respectively.

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 offender detection and response. We also note the importance of empowering victims and survivors to speak out and report abuse, if this is the right choice for them (see pages 46 to 49). Knowmore plays a significant role in this through our legal and related

¹⁰⁶ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 2.

¹⁰⁷ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 18.

¹⁰⁸ 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>; Parliament of Australia, *Quality and safety of Australia's early childhood education and care system*, accessed 18 February 2026, p 25, paragraph 2.4, <https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Education_and_Employment/ECECqualitysafety>.

support service for victims and survivors of child sexual abuse (see pages 28 to 29).

Our comments below address the following matters:

- addressing the social conditions that enable child abuse
- improving the regulatory environments for child safety.

Addressing the social conditions that enable child abuse

In Knowmore's view, improving the prevention of child abuse requires the Australian Government to lead a stronger response to 'the ongoing systemic and social conditions that enable' child abuse.¹⁰⁹ In relation to this, 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, ableism, ageism, and the enduring impacts of colonialism – further sustain and exacerbate this 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.*¹¹⁰

Knowmore is acutely aware of the gendered nature of child abuse, and the threat that patriarchal norms, including misogyny, male sexual entitlement and patriarchal privilege, pose to the safety of children.¹¹¹ We note that girls

¹⁰⁹ SA Royal Commission, *With courage: South Australia's vision beyond violence*, p 9.

¹¹⁰ SA Royal Commission, *With courage: South Australia's vision beyond violence*, p 9.

¹¹¹ See, Kelly Richards and Emma Hussey, *Why Do Adults Sexually Abuse Children? A Systematic Scoping Review of How Male Perpetrators Qualitatively Account for Their Actions, Victims & Offenders*, 12 February 2026, p 38, <<https://www.tandfonline.com/doi/epdf/10.1080/15564886.2026.2615842?needAccess=true>>.

are twice as likely as boys to experience child sexual abuse,¹¹² and that most perpetrators of child sexual abuse are men.¹¹³

Perpetrators often use child sexual abuse as a form of violence against women. For example, perpetrators may say that 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'.¹¹⁴

As highlighted by our comments on pages 23 to 24, children who experience intersectional marginalisation are also more likely to experience abuse, and to experience additional barriers when seeking safety, justice and support. In Knowmore's view, plans to prevent and respond to child abuse will be incomplete and of limited effectiveness if they do not engage with the experiences and perspectives of children and survivors who experience intersectional marginalisation. As the Australian Child Maltreatment Study recognises:

*Our national response to child maltreatment needs to pay close attention to the experience of boys; but it needs to pay special attention to identify and respond to the factors influencing these additional vulnerabilities for girls.*¹¹⁵

Knowmore recommends that the Second Action Plan include action items for the Australian Government to lead work with state and territory governments to develop and implement strategies for preventing and

¹¹² More than 1 in 3 girls (37.3%) and almost 1 in 5 boys (18.5%) have experienced child sexual abuse. See Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 17.

¹¹³ 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>.

¹¹⁴ 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>.

¹¹⁵ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 3.

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, and drive action to address the social conditions that enable child abuse.

Recommendation 8

The Second Action Plan should include action items for the Australian Government to lead work with state and territory governments to develop and implement 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, and drive action to address the social conditions that enable child abuse.

Improving the regulatory environments for child safety

As highlighted by our comments on pages 25–26, there remains a significant level of complexity and inconsistencies in the regulatory environments for child safety across Australian jurisdictions.¹¹⁶ For example:

- there are inconsistencies in the 3 obligatory reporting models in Australia: mandatory reporting, ‘failure to report’ offences and reportable conduct schemes¹¹⁷

¹¹⁶ For example, see Knowmore, *Submission on the quality and safety of Australia’s early childhood education and care system*, pp 18–19; Royal Commission, *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>.

¹¹⁷ See Knowmore, *Submission on the quality and safety of Australia’s early childhood education and care system*, pp 26–29.

- the Child Safe Standards and the National Principles for Child Safe Organisations are not being consistently implemented across Australia¹¹⁸
- the human rights of children in all parts of Australia are inadequately and inconsistently protected¹¹⁹
- 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.¹²⁰

Inconsistencies in child safe practices within and across jurisdictions continue to create challenges in implementing effective measures to keep children safe.¹²¹ 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 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.*¹²²

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

¹¹⁸ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 29–31.

¹¹⁹ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 32–34.

¹²⁰ See Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 46–48.

¹²¹ See, for example, Parliament of Australia, *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.

¹²² Parliament of Australia, *Quality and safety of Australia's early childhood education and care system*, p 128, paragraph 6.17.

children checks.¹²³ There is momentum supporting reforms to improve child safety, presenting an opportunity for the Australian Government to lead further coordinated reform.

We particularly wish to highlight the importance of a nation-wide approach to improving education and community awareness.¹²⁴ Education and community awareness initiatives must reflect an understanding of child abuse that is broader than ‘stranger danger’, given that perpetrators of child abuse are generally known to the child.¹²⁵

In our view, 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 Organisations¹²⁶

¹²³ 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, <<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).

¹²⁴ See National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, accessed 29 July 2026, p 38, <<https://www.childsafety.gov.au/system/files/2025-05/national-strategy-prevent-and-respond-to-child-sexual-abuse-2021-2030.pdf>>; Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, pp 32–34, recommendation 38.

¹²⁵ 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*.

¹²⁶ See, Royal Commission, *Final report: volume 6, making institutions child safe*, p 292, recommendation 6.8.

- implementing nationally consistent reportable conduct schemes, reflecting best practice standards¹²⁷
- implementing Human Rights Acts that include specific, enforceable protections of the human rights of children, victims and survivors (for further comments about victims' and survivors' rights, see page 47 above)¹²⁸
- implementing a national information exchange scheme, enabling direct information-sharing for child safety purposes between relevant organisations, both within and across jurisdictions¹²⁹
- 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 and recommendation 38 of the Australian Law Reform Commission's *Safe, informed, supported* report)¹³⁰
- 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 care¹³¹
- ensuring adequate and secure funding of all child safety regulators, recognising that this will require an increase in funding for many child safety regulators¹³²

¹²⁷ See, Royal Commission, *Final Report: Volume 7, Improving institutional responding and reporting*, p 283, recommendation 7.9.

¹²⁸ See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 32–34, recommendation 7.

¹²⁹ See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 46–48, recommendation 12.

¹³⁰ 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.

¹³¹ 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>.

¹³² See, Knowmore, *Submission on the quality and safety of Australia's early childhood education and care system*, pp 41–43, recommendation 10.

- ensuring adequate and secure funding for offender prevention and intervention services for potential and existing offenders¹³³
- 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 37 to 40 and pages 53 to 55).

¹³³ See, Royal Commission, *Final report: volume 6, making institutions child safe*, p 107, recommendation 6.2.

Recommendation 9

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 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.

Improving responses to children and young people who display harmful sexual behaviours

Children and young people who display harmful sexual behaviours require responses that prioritise safety, accountability, rehabilitation and healing. Knowmore recognises the alignment between:

1. the findings and recommendations of the Royal Commission, and
2. the National Strategy and First National Action Plan.

This alignment includes support for a public health model for preventing and responding to children with harmful sexual behaviours, involving early action, assessment and help to access therapeutic intervention.¹³⁴ We support an approach to the Second Action Plan that maintains and builds upon this alignment. Harmful sexual behaviours by children raise complex and sensitive considerations, impacting children, victims and survivors. As the National Strategy recognises:

¹³⁴ Royal Commission, *Final report: volume 10, children with harmful sexual behaviours*, p 133; National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 43.

- harmful sexual behaviours by children ‘can have the same devastating effect as abuse by adults’¹³⁵
- children with harmful sexual behaviours ‘are often victims and survivors [of child abuse] themselves’ and ‘may have an intellectual impairment, learning difficulty, or neurodevelopmental disorder’¹³⁶
- most children with harmful sexual behaviours ‘do not go on to commit sexual abuse as adults’¹³⁷
- a therapeutic response, tailored to the child’s individual needs, can reduce future harm and support positive behavioural change.¹³⁸

We welcome the consultation paper’s focus on improving responses to children and young people who display harmful sexual behaviours.¹³⁹ As noted on page 10 above, victims and survivors of child sexual abuse in Australia most commonly experienced harmful sexual behaviours by known adolescents under the age of 18.¹⁴⁰ Almost 1 in 7 people in Australia (13.7%) have experienced child sexual abuse in the form of harmful sexual behaviours by children.¹⁴¹ The evidence suggests that this is increasing.¹⁴² In addition, 45% of harmful sexual behaviour incidents reported to statutory child protection are from schools.¹⁴³ These findings highlight the need for a

¹³⁵ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 27.

¹³⁶ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 69.

¹³⁷ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 43.

¹³⁸ National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 43.

¹³⁹ Australian Government, Attorney-General’s Department and the National Office for Child Safety, Consultation paper, p 6.

¹⁴⁰ Australian Child Maltreatment Study, *The prevalence and impact of child maltreatment in Australia: findings from the Australian Child Maltreatment Study: brief report*, p 17.

¹⁴¹ Ben Mathews et al., *Child sexual abuse by different classes and types of perpetrator: prevalence and trends from an Australian national survey*.

¹⁴² See Ben Mathews et al., *Child sexual abuse by different classes and types of perpetrator: prevalence and trends from an Australian national survey*.

¹⁴³ Bravehearts, *Harmful sexual behaviours (incl. peer-instigated abuse)*, accessed 27 July 2026, <bravehearts.org.au/research-lobbying/stats-facts/harmful-sexual-behaviours-peer-instigated-abuse/>.

coordinated approach across a range of systems, including education, child protection, health and legal systems.

Our comments below address the following matters:

- the need for a nationally consistent framework for preventing and responding to harmful sexual behaviours by children
- the importance of restorative justice options – with appropriate safeguards – in the context of harmful sexual behaviours by children.

A nationally consistent framework

The Royal Commission highlighted the absence of a coordinated, national approach as a significant gap in Australia's response to children with harmful sexual behaviours.¹⁴⁴ We recognise the significant work undertaken by the National Office to achieve a more coordinated approach.¹⁴⁵ We also recognise the relevant work undertaken by state and territory governments.¹⁴⁶ In Knowmore's view, the Australian Government must lead work with state and territory governments to develop and implement a nationally consistent framework for preventing and responding to harmful sexual behaviours by children (Harmful Sexual Behaviours Framework). This framework should (among other things) establish common definitions, assessment tools, referral pathways, data collection standards and coordinated responses across jurisdictions.

We consider that a Harmful Sexual Behaviours Framework has significant potential to drive necessary and effective change nation-wide. Greater investment is needed in specialist therapeutic services. Early intervention is critical because children who receive appropriate assessment, treatment

¹⁴⁴ Royal Commission, *Final report: volume 10, harmful sexual behaviours by children*, p 106.

¹⁴⁵ National Office for Child Safety, *Third annual report 2025: National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, pp 62–69.

¹⁴⁶ See, for example, Victorian Government, Department of Families, Fairness and Housing, *New Responding to Sexual Violence and Harmful Sexual Behaviour Capability Framework*, July 2026, <www.dffh.vic.gov.au/news/new-responding-sexual-violence-and-harmful-sexual-behaviour-capability-framework>; Western Australian Government, *Framework for Understanding and Guiding Responses to Harmful Sexual Behaviours in Children and Young People*, 2 June 2022, accessed 24 July 2026, <www.wa.gov.au/government/publications/framework-understanding-and-guiding-responses-harmful-sexual-behaviours-children-and-young-people>.

and support are more likely to cease harmful behaviours and less likely to engage in further harm.¹⁴⁷ Services should be accessible across metropolitan, regional and remote communities and be culturally safe for First Nations children and families.

As highlighted by our comments on pages 49 to 53, further capability development of the workforce is also important. Teachers, child protection practitioners, health professionals, police and community service workers require appropriate support and training to distinguish between sexual behaviours that are age-appropriate, and those that are problematic or harmful.¹⁴⁸ Schools should be supported to provide evidence-based consent and respectful relationships education (see page 63), and with clear response protocols and access to specialist consultation services.¹⁴⁹

Responses to harmful sexual behaviours by children must also better support children who have been harmed. In relation to this, we refer to the discussion on pages 39 to 40 about the challenges experienced by victims and survivors in navigating the complex and fragmented systems for accessing safety, justice and support. These challenges are often heightened for children, whose access to appropriate support ‘often relie[s] on luck, persistent advocacy from a trusted adult, or informal networks of friends, teachers and neighbours’.¹⁵⁰

A Harmful Sexual Behaviours Framework should also seek to expand victims’ and survivors’ access to restorative justice options, with appropriate safeguards. We make further comments about this on pages 71 to 74.

¹⁴⁷ See National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, p 43.

¹⁴⁸ See Royal Commission, *Final report: volume 10, harmful sexual behaviours by children*, p 36, table 10.1.

¹⁴⁹ For example, see, Adelaide University, *Harmful Sexual Behaviours Project*, accessed 29 July 2026, <<https://accp.adelaide.edu.au/our-projects/harmful-sexual-behaviours-program-of-work/>>.

¹⁵⁰ 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>.

In light of the considerations outlined above, we recommend that the Second Action Plan include an action item for the Australian Government to lead work with state and territory governments to develop and implement a nationally consistent framework for preventing and responding to harmful sexual behaviours by children.

This framework should reflect the National Strategy's support for a public health model. This framework should also:

- establish common definitions, assessment tools, referral pathways, data collection standards and coordinated responses across jurisdictions
- drive greater investment in specialist therapeutic services for children with harmful sexual behaviours
- support further capability development of the workforce to prevent and respond to harmful sexual behaviours by children
- better support children who have been harmed, including legal advice and related support
- seek to expand victims' and survivors' access to restorative justice options, with appropriate safeguards.

Recommendation 10

The Second Action Plan include an action item for the Australian Government to lead work with state and territory governments to develop and implement a nationally consistent framework for preventing and responding to harmful sexual behaviours by children.

This framework should reflect the National Strategy's support for a public health model. This framework should also:

- establish common definitions, assessment tools, referral pathways, data collection standards and coordinated responses across jurisdictions
- drive greater investment in specialist therapeutic services for children with harmful sexual behaviours
- support further capability development of the workforce to prevent and respond to harmful sexual behaviours by children
- better support children who have been harmed, including legal advice and related support
- seek to expand victims' and survivors' access to restorative justice options, with appropriate safeguards.

The importance of restorative justice options

In Knowmore's view, expanding victims' and survivors' access to restorative justice options – with appropriate safeguards – is important in the context of harmful sexual behaviours by children (see the discussion on page 48). The Royal Commission defined 'restorative justice' in the following terms:

'Restorative justice' can describe a range of processes to address harm. Those approaches generally involve an offender admitting that they caused the harm and then engaging in a process of dialogue with those directly affected and discussing appropriate courses of action

*which meet the needs of victims and others affected by the offending behaviour.*¹⁵¹

In its report on justice responses to sexual violence (see page 31), the ALRC cited extensive evidence in support of expanding access to restorative justice responses.¹⁵² In relation to harmful sexual behaviours by children, the ALRC observed that:

*Restorative justice is widely used in the youth justice system, which places greater emphasis on rehabilitation and addressing the underlying causes of offending than criminal justice responses to adult offending. But aside from in Queensland and South Australia, access to restorative justice for sexual offences committed by children and young people is currently limited.*¹⁵³

While recognising that ‘the risks of restorative justice need to be carefully managed’,¹⁵⁴ the ALRC also considered that restorative justice options should be consistently accessible for offences involving harmful sexual behaviour by children.¹⁵⁵

Knowmore broadly agrees. In particular, we note a review conducted for the Royal Commission, examining the research evidence on restorative justice approaches in relation to child sexual abuse. This review concluded that ‘under specific conditions, participation [in restorative justice processes] improves victim wellbeing and is perceived by victim-survivors as satisfying, worthwhile and procedurally fair’.¹⁵⁶

¹⁵¹ Royal Commission, *Criminal justice report: executive summary and parts I and II*, August 2017, p 183, <www.childabuseroyalcommission.gov.au/criminal-justice>.

¹⁵² Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 551, paragraph 17.13.

¹⁵³ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 569, paragraph 18.38.

¹⁵⁴ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 553.

¹⁵⁵ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 569, paragraph 18.38.

¹⁵⁶ Jane Bolitho and Karen Freeman, *The use and effectiveness of restorative justice in criminal justice systems following child sexual abuse or comparable harms*, 2016, p 7, <www.childabuseroyalcommission.gov.au/getattachment/9f328928-a343-4c65-b98e-94e3185894c7/Restorative-justice-following-child-sexual-abuse-o>.

Knowmore has particularly seen the value of restorative justice options in our work supporting victims and survivors of child abuse to access a direct personal response (an apology or other recognition) under the National Redress Scheme, and similar options as part of other redress, justice-making and support processes.¹⁵⁷ For many of our clients, having someone recognise the abuse they experienced and acknowledge how that abuse has impacted their lives is an important part of justice and healing. Restorative justice processes can also encourage accountability, empathy and behavioural change in children who have caused harm.

Restorative justice processes are not suitable for all situations.¹⁵⁸ However, noting the trauma-informed principle of choice,¹⁵⁹ we consider that victims and survivors who wish to participate in restorative justice processes should have the option to do this. These processes must be:

- evidence-based, noting ‘the important work already done by people with lived experience of sexual violence, researchers, practitioners, and past inquiries’¹⁶⁰
- survivor-focused, trauma-informed and culturally safe¹⁶¹
- accompanied by appropriate safeguards to appropriately protect children, including specialised screening and independent support from experts¹⁶²

¹⁵⁷ We note that similar options to the direct personal response are available under the Territories Stolen Generations Redress Scheme, the WA Stolen Generations Redress Scheme and Victoria’s Victims of Crime Financial Assistance Scheme. See Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, p 44.

¹⁵⁸ See Royal Commission, *Criminal justice report: executive summary and parts I and II*, p 190; Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, pp 553–554 and 571–572.

¹⁵⁹ See Blue Knot Foundation, *Trauma-Informed Services*, accessed 29 July 2026, <<https://professionals.blueknot.org.au/resources/trauma-informed-services/>>.

¹⁶⁰ Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 556, paragraph 18.3.

¹⁶¹ See Knowmore, *Submission to the Australian Law Reform Commission’s inquiry into justice responses to sexual violence*, pp 34–35.

¹⁶² Australian Law Reform Commission, *Safe, informed, supported: reforming justice responses to sexual violence*, p 571, paragraph 18.46.

- accompanied by appropriate safeguards to support children, victims and survivors to make informed decisions and to protect against the potential for further harm – this should include legal advice and related support (see pages 33 to 37).

Knowmore is well placed to contribute to the development and delivery of restorative justice options for people affected by harmful sexual behaviours. Through our extensive experience supporting survivors of child sexual abuse and navigating complex justice processes, we have developed significant expertise in trauma-informed practice, legal advocacy and survivor-centred service delivery. Knowmore could play a role in providing information, legal advice and supported decision-making to survivors considering all of their options, including restorative justice options, helping them understand their rights, assess potential benefits and risks, and participate in processes safely and voluntarily. Knowmore could also contribute to policy development, practitioner training and the design of restorative justice frameworks that are responsive to the needs of survivors.

We recommend that, in developing the Second Action Plan, the National Office for Child Safety should consider how Knowmore can contribute to the development and delivery of restorative justice options for people affected by harmful sexual behaviours, relevant policy, practitioner training and the design of restorative justice frameworks.

Recommendation 11

In developing the Second Action Plan, the National Office for Child Safety should consider how Knowmore can contribute to the development and delivery of restorative justice options for people affected by harmful sexual behaviours, relevant policy, practitioner training and the design of restorative justice frameworks.

Addressing online child sexual abuse and online harms

As highlighted by our comments above, online child abuse is widespread and increasing, with almost 15% of children in Australia experiencing online sexual abuse (see pages 11 and 57). In relation to child abuse material

online, the Australian Federal Police have commented that law enforcement ‘can’t keep playing whack-a-mole with the numbers that we’re receiving’.¹⁶³

Technology is evolving rapidly and the law is struggling to keep up. The development and implementation of the Second Action Plan presents an opportunity for Australian governments to change the dynamic. Given the international aspects of this problem, we consider that the Australian Government should lead work internationally and with state and territory governments to improve how Australia prevents and responds to online child abuse.

Our comments below address key considerations that, in our view, should inform how Australia prevents and responds to online child abuse.

Key considerations

We make comments about each of the following key considerations below:

- the need for greater consistency and cooperation across jurisdictional borders
- ensuring that all victims and survivors of online child abuse have access to meaningful redress, justice-making and support options
- implementing a digital duty of care on online service providers
- improving education and community awareness about online risks and reporting mechanisms
- addressing the growing role of AI in child abuse
- reconsidering the social media minimum age.

¹⁶³ Parliament of Australia, *Quality and safety of Australia’s early childhood education and care system*, pp 25–26, paragraph 2.6.

Need for greater consistency and cooperation

Online child abuse often occurs across jurisdictional borders,¹⁶⁴ with varying legal frameworks to address online abuse.¹⁶⁵ For example, the survivor, the perpetrator and the relevant technology companies might all be located in different states, territories or countries when the abuse occurs. It may also be the case that parts of the abuse occur online and parts of the abuse occur offline.¹⁶⁶ It is often challenging to work out which laws apply, which agencies to report the abuse to, how to evidence the abuse or what the likely outcome will be. This highlights the need for greater consistency and cooperation across jurisdictional borders.

Accessing redress, justice-making and support options

Victims and survivors of online child abuse often experience additional barriers to accessing redress, justice-making and support options. For example, victims support schemes do not consistently recognise online child abuse as meeting their eligibility criteria (for example, in some cases involving image-based abuse).¹⁶⁷ Victims support schemes may also require victims and survivors to prove that they have been injured or suffered a loss as the result of a crime.¹⁶⁸ Knowmore considers it to be unnecessary and inappropriate to require victims and survivors of child abuse to prove that they were injured or suffered a loss in order to access a victims' support scheme.¹⁶⁹ For some forms of online child abuse, it may be particularly challenging to provide evidence of an injury or loss to the satisfaction of the relevant victims support scheme or decision-maker, despite the traumatic impacts of the abuse.

¹⁶⁴ Australian Government, Attorney-General's Department and the National Office for Child Safety, Consultation paper, p 5.

¹⁶⁵ Australian Institute of Criminology, *National review of child sexual abuse and sexual assault legislation in Australia*, 15 October 2024, p xvii, <https://www.aic.gov.au/sites/default/files/2024-10/national_review_of_csa_and_sexual_assault_legislation_in_australia.pdf>.

¹⁶⁶ Australian Institute of Criminology, *National review of child sexual abuse and sexual assault legislation in Australia*, p 28.

¹⁶⁷ See, for example, *Victims Rights and Support Act 2013* (NSW), section 19.

¹⁶⁸ See, for example, *Victims of Crime Assistance Act 2009* (Qld), section 25(1)(b).

¹⁶⁹ Knowmore, *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, pp 49 –50.

Implementing a digital duty of care

We note eSafety's assessment that technology companies, including Apple, Google, Meta and Microsoft, are failing to address critical safety gaps in detecting and preventing child sexual abuse on their services.¹⁷⁰ In relation to this, we welcome the Australian Government's announcement that it will implement a digital duty of care, '[placing] the responsibility for protecting the online safety of Australians on online service providers'.¹⁷¹ We consider this to be an important reform.

Improving education and community awareness

We recognise that the eSafety Commissioner has undertaken significant work under the National Strategy to prevent and respond to online child sexual abuse. This includes work to improve education and community awareness about online risks, and reporting mechanisms for online abuse and harmful content.¹⁷² We consider this valuable work that should continue, with the support of Australian governments.

Addressing the growing role of AI in child abuse

As noted on page 11, Knowmore is particularly concerned by the growing role of AI in child abuse. eSafety provides the following outline of this issue:

Perpetrators are using AI to create and distribute true-to-life images of child abuse, sometimes based on images of victim-survivors, and sometimes using completely synthetic models of children ...

Generative AI tools that can be used to produce explicit content – such as 'nudify' apps that digitally remove clothing – are proliferating online. They are widely available, and quick and easy to use. Many are also free. The accessibility of such platforms has also

¹⁷⁰ eSafety Commissioner, *eSafety report shows while tech giants have made some progress they still have a long way to go in stamping out online child sexual abuse*.

¹⁷¹ Australian Government, *A Digital Duty of Care for Australia—Developing a duty of care framework for online services used by Australians*, 26 May 2026, accessed 7 July 2026, p 2, <<https://www.infrastructure.gov.au/sites/default/files/documents/digital-duty-of-care-for-australia-developing-duty-of-care-framework-for-online-services-used-by-australians-may2026.pdf>>.

¹⁷² National Office for Child Safety, *National Strategy Third Annual Report – 2025*, p 108.

made it easier for children to create inappropriate or harmful material of their peers.

Synthetic images of children are being used for extortion and exploitation, creating complex challenges ... This is incredibly important, because if it is authentic, it may depict a child in need of rescuing.¹⁷³

eSafety observed 'a 218% increase in reports of AI-generated CSEA [that is, child sexual exploitation and abuse material] from 2023 to 2024 alone'. A recent study by the Australian Cybercrime Observatory found that one in 25 children have experienced or have a friend who has experienced online sexual abuse involving the use of AI.¹⁷⁴ In addition, children who have experienced online sexual abuse are more likely to disclose the abuse to AI than to the police, teachers, reporting lines or reporting websites.¹⁷⁵

Reconsidering the social media minimum age

Knowmore has been concerned to see Australian governments rush through online child safety reforms without adequate consultation. A key example is the social media minimum age, which requires particular social media platforms to take reasonable steps to prevent children under the age of 16 years from having accounts.¹⁷⁶ This is sometimes referred to as a

¹⁷³ eSafety Commissioner, *Generative AI and child safety: A convergence of innovation and exploitation*, accessed 29 July 2026, <<https://www.esafety.gov.au/industry/tech-trends-and-challenges/convergence-series/generative-ai-and-child-safety-a-convergence-of-innovation-and-exploitation>>.

¹⁷⁴ Timothy Cubitt et al., *AI- and non-AI online child sexual victimisation, disclosures and help seeking A national study of Australian adolescents*, p 40.

¹⁷⁵ Timothy Cubitt et al., *AI- and non-AI online child sexual victimisation, disclosures and help seeking A national study of Australian adolescents*, p 43.

¹⁷⁶ eSafety Commissioner, *Social media age restrictions*, accessed 29 July 2026, <<https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions>>.

‘social media ban’.¹⁷⁷ The Australian Government rushed the law for the social media minimum age through the Australian Parliament with only one day for public consultation.¹⁷⁸

As part of the Australian Child Rights Taskforce, Knowmore has expressed concerns about the social media minimum age, including that:

- it affects children’s rights to access and participate in the online environment – an important source of healthy connection and support for many children
- implementing the social media minimum age effectively remains a challenge.¹⁷⁹

We welcome eSafety’s commencement of a comprehensive evaluation of the social media minimum age.¹⁸⁰ The Australian Government should consider whether to repeal the social media minimum age or change how it is implemented, taking into account the results of eSafety’s evaluation (once this is complete).

Recommendation

In our view, the Second Action Plan should include action items for the Australian Government to lead work internationally and with state and

¹⁷⁷ Natassia Chrysanthos, ‘We have been here before’: No quick fix for social media ban, says rights commissioner, *The Sydney Morning Herald*, 1 July 2026, accessed 29 July 2026, <<https://www.smh.com.au/politics/federal/we-have-been-here-before-no-quick-fix-for-social-media-ban-says-rights-commissioner-20260701-p60bpv.html>>; Josh Taylor, *Three months into Australia’s world-first social media ban for under-16s, has it been a success?*, *The Guardian*, 4 March 2026, accessed 29 July 2026, <<https://www.theguardian.com/australia-news/2026/mar/04/australia-social-media-ban-under-16s-three-month-review>>; Elissa Fitzgerald, *How will the federal government’s under-16s social media ban work? Here’s what we know*, *ABC News*, 30 July 2025, accessed 29 July 2026, <<https://www.abc.net.au/news/2025-07-30/teen-social-media-ban-explained/105590990>>.

¹⁷⁸ eSafety Commissioner, *Social media age restrictions*.

¹⁷⁹ Australian Child Rights Taskforce, *Proposed social media bans for children under 16-year olds*, 9 October 2024, <<https://apo.org.au/sites/default/files/resource-files/2024-10/apo-nid328608.pdf>>.

¹⁸⁰ eSafety Commissioner, *Social media age restrictions evaluation*, accessed 29 July 2026, <<https://www.esafety.gov.au/research/social-media-age-restrictions-evaluation>>.

territory governments to improve how Australia prevents and responds to online child abuse. This should include:

- greater consistency and cooperation across jurisdictional borders
- ensuring that all victims and survivors of online child abuse have access to meaningful redress, justice-making and support options
- implementing a digital duty of care on online service providers
- supporting the eSafety Commissioner to continue work to improve education and community awareness about online risks, and reporting mechanisms for online abuse and harmful content
- addressing the growing role of AI in child abuse
- considering whether to repeal the social media minimum age or change how it is implemented, taking into account the results of eSafety's comprehensive evaluation of the policy (once this is complete).

Recommendation 12

The Second Action Plan should include action items for the Australian Government to lead work internationally and with state and territory governments to improve how Australia prevents and responds to online child abuse. This should include:

- greater consistency and cooperation across jurisdictional borders
- ensuring that all victims and survivors of online child abuse have access to meaningful redress, justice-making and support options
- implementing a digital duty of care
- supporting the eSafety Commissioner to continue work to improve education and community awareness about online risks, and reporting mechanisms for online abuse and harmful content
- addressing the growing role of AI in child abuse
- considering whether to repeal the social media minimum age or change how it is implemented, taking into account the results of eSafety's comprehensive evaluation of the policy (once this is complete).

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). Knowmore has also been providing legal and financial counselling support to people who have received a redress offer from the Western Australian Stolen Generations Redress Scheme, which commenced in 2025.

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.

Knowmore submission on the National Strategy to Prevent and Respond to Child Sexual Abuse – Second Action Plan | 82

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

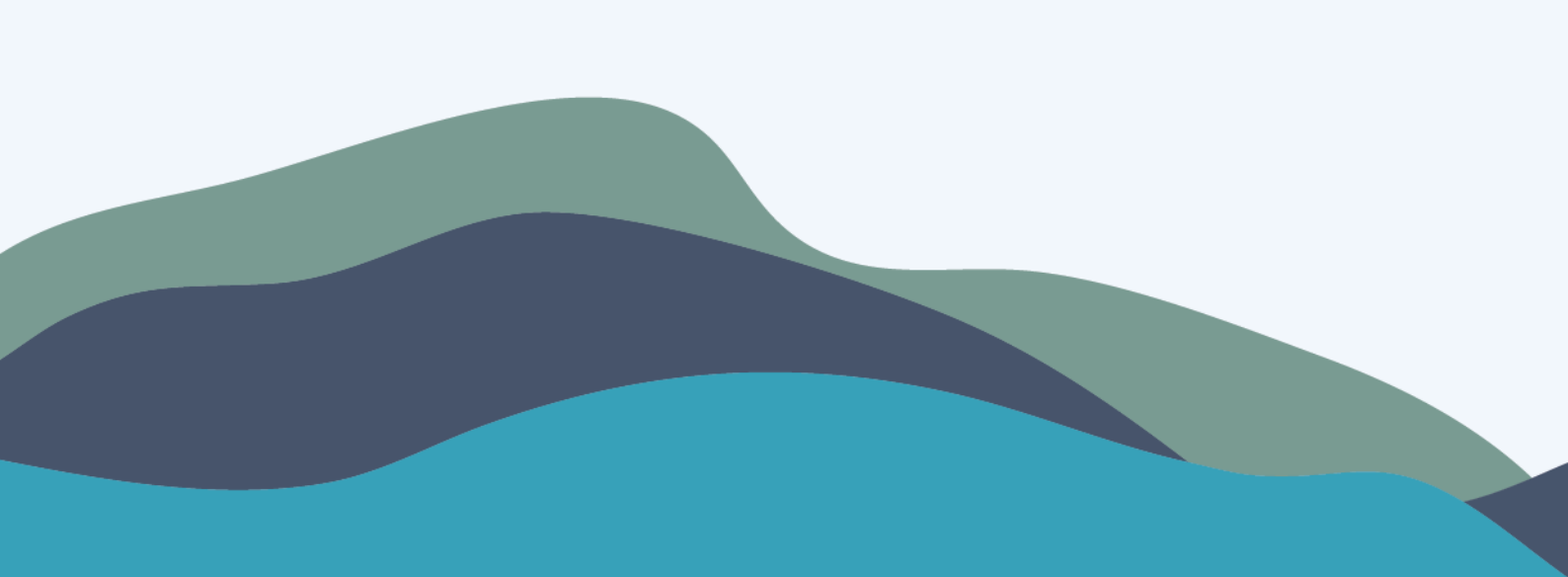
In the report on a systemic inquiry into victim participation in the justice system in November 2023, the Victorian Victims of Crime Commissioner identified the following matters that a comprehensive legal service for victims and survivors of crime could assist with. The list is illustrative, not exhaustive.¹⁸¹

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

¹⁸¹ 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

Legal Service

Free advice line: 1800 605 762 **Email:** info@knowmore.org.au **Web:** www.knowmore.org.au

ADELAIDE SA

Level 1, 99 Gawler Place
Adelaide SA 5000
GPO Box 1305
Adelaide SA 5001
t: 08 7092 2740

DARWIN NT

Level 2, 13 Cavenagh Street
Darwin City NT 0800
GPO Box 413
Darwin NT 0801
t: 08 7918 8455

PERTH WA

12 Newcastle Street
Perth WA 6000
PO Box 277
Perth WA 6849
t: 08 6117 7244

BRISBANE QLD

Level 20, 144 Edward Street
Brisbane QLD 4000
PO Box 2151
Brisbane QLD 4001
t: 07 3218 4500

MELBOURNE VIC

Level 7, 607 Bourke Street
Melbourne VIC 3000
PO Box 504
Collins Street West VIC 8007
t: 03 8663 7400

SYDNEY NSW

Level 15, 175 Liverpool Street
Sydney NSW 2000
PO Box 267
Darlinghurst NSW 1300
t: 02 8267 7400
