

Catholic Social Services Australia

Submission to the Department of
Social Services

Consultation on the Second
Action Plans under Safe and
Supported: The National
Framework for Protecting
Australia's Children 2021–2031

September 2026

ABOUT CATHOLIC SOCIAL SERVICES AUSTRALIA

Catholic Social Services Australia (CSSA) advocates for the Church's social service ministry and is the peak body for Catholic social service providers. We envision a just, inclusive, and compassionate Australian society that reflects and supports the dignity, equality, and participation of all people.

Delivering **\$1.4 billion** of services on behalf of governments across the Federation, our **42 member agencies** provide a diverse range of services to approximately half a million people across Australia including: specialist domestic and family violence services, children's and family services, housing and homelessness services, emergency relief and financial counselling, , early childhood education and care, foster and out-of-home care, youth work, family and relationship support, aged care, NDIS and other disability services, support for survivors of modern slavery and refugee and asylum seeker assistance.

Supporting services that help families and children is a key strategic priority for CSSA. Over **80 per cent** of our members provide services to children and families that promote and strengthen family wellbeing and support early intervention and over **70 per cent** of our member services include youth services. Other member services provide specialist family relationship services as well as specialist family violence support services.

Our network operates across more than **seven hundred** locations in Australia, employing over **10,000** staff, strengthened by the contribution of over **3,000** volunteers.

For over **seventy years**, CSSA has been at the forefront of advocating for those experiencing disadvantage. Our network of member agencies ranks among the largest and longest-established social services providers in the nation, with a presence in every state and territory in Australia.

Acknowledgement

CSSA acknowledge the Traditional Custodians of the many lands and waters on which we live, work, and serve. We pay our deep respects to Elders past and present, and we recognise the continuing connection of Aboriginal and Torres Strait Islander peoples to Country, culture, and community. We honour their enduring spiritual relationship with the Creator which is woven through their stories of our sacred land, and tells of a relationship that has nurtured wisdom, belonging, and care for creation since time immemorial.

We commit ourselves to walk together in truth and justice - listening, learning and standing in solidarity with First Nations peoples as we seek reconciliation and healing.

INTRODUCTION

“ For children are a gift. Each one is unique and irreplaceable... We love our children because they are children, not because they are beautiful, or look or think as we do, or embody our dreams. We love them because they are children. – His Holiness Pope Francis¹ ”

CSSA thanks the Department of Social Services (the Department) for the opportunity to consult on the Second Action Plans under *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*. We welcome the consultation's commitment to develop the *National Second Action Plan* and the *Aboriginal and Torres Strait Islander Second Action Plan* to continue the work developed under the *First Action Plans 2023-2026* in guiding national action from 2027 to 2031.

Foremost, we acknowledge the suffering, strength and resilience of those who have experienced child abuse and neglect in Australia and who continue to live with the risks and realities of child abuse and neglect. We recognise and accept our shared responsibility to ensure the health and wellbeing of all children and young people, especially those living in disadvantage, with vulnerability and complex needs.

We commend the Department for developing the Second Action Plans in collaboration with other national family and children's safety action plans including: *the Second Action Plan to End Violence against Women and their Children 2026-2031*; the First Action Plan under *Our Ways, Strong Ways, Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026-2036*; and the Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030* (through the Federal Attorney-General's Department).

We encourage the Department to articulate where specific activities can work together to achieve shared objectives across these other national family and children's safety action plans. We see this work is best continued under *Safe and Supported* by continued and sustained focus on the **eight existing action areas** under the existing Action Plans focused on **four priority groups**, including:

1. Children and families with multiple and complex needs.
2. Aboriginal and Torres Strait Islander children and families experiencing disadvantage or who are vulnerable.
3. Children and young people with disability and/or parents/carers with disability experiencing disadvantage or who are vulnerable.

¹ Francis, *Amoris Laetitia: Post-Synodal Apostolic Exhortation on Love in the Family* (19 March 2016), page 129. https://s3.ap-southeast-2.amazonaws.com/acbcwebsite/Articles/Documents/ACBC/INGLESE_TESTO.pdf

4. Children and young people who have experienced abuse and/or neglect, including those in out-of-home care.

We regard work under both *First Action Plans* as unfinished business with several actions yet to be completed, the status of other actions unclear and no evaluation of the *First Action Plans* available. While timing constraints do not permit detailed review of the status of all actions across both *First Action Plans*, we recommend priority actions to be continued under both *Second Action Plans* include:

From the First Action Plan:

- **Action 1 – Early Supports** (also **Action 8a** of the *Aboriginal and Torres Strait Islander First Action Plan*) – continued focus on place-based partnerships, with particular attention to the benefits of Child and Family Hubs as early intervention and prevention models for vulnerable children and families.
- **Action 2 – Data and Research** – Continue efforts toward a national child protection data and analysis system that has reporting capability to respond to the specific requirements for Safe and Supported priority groups, including those living with disability.
- **Action 3 – Workforce** – Finalisation of a national approach or strategy for a sustainable and skilled children and family workforce, including ensuring sufficient numbers of professionals with skills in child-centred, trauma-informed and culturally- safe practice.
- **Action 5c.i. Out-of-Home Care/Health** – Improve access to allied health services and health management plans for children and young people with a care experience, with priority given to updating and strengthening the *National Clinical Assessment Framework for Children and Young People in Out-of-Home Care (2011)*.
- **Action 5c.ii Out-of-Home Care/Housing** – Continue efforts to partner with key groups to facilitate inclusive housing responses and actions to support families affected by Domestic and Family Violence.
- **Action 7b. – Disability** – extend current sub-activities to improve the early identification, information, supports and referral pathways of children and young people with disability and/or developmental concerns and parents and carers with disability to enable timely access to child and family supports outside the NDIS, with particular attention to the *Thriving Kids* initiative due for stage one implementation from 1 October 2026.

- **Action 8 – Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP)** (also **Action 5** of the *Aboriginal and Torres Strait Islander First Action Plan*) – In partnership with the Australian Institute of Health and Welfare and Aboriginal and Torres Strait Islander people, continue to endeavour to capture and report on compliance with all five elements of the ATSICPP.

From the First Aboriginal and Torres Strait Islander First Action Plan:

- **Action 2 – Investing in the Community Controlled Sector** – Full implementation of the *National Child and Family Investment Strategy* focusing on a clear set of national principles and actions under the ACCO Leadership Transition Framework led by SNAICC.
- **Action 4 – Aboriginal and Torres Strait Islander Workforce** – Finalisation of Aboriginal and Torres Strait Islander workforce development report that includes current needs analysis, and projected needs analysis (including considerations regarding coverage, capacity, quality and resources) in collaboration with Early Childhood and Care Development Sector Strengthening Plan.
- **Action 6 – Legal Supports** – Finalisation of the Legal Supports scoping study undertaken by SNAICC and consideration of recommendations of the scoping study through the Closing the Gap Justice Policy Partnership and Early Childhood Care & Development Policy Partnership.

Responses to Key Discussion Paper Questions

Our submission responds directly to the six key questions in the *Safe and Supported Discussion Paper: Identifying priorities for the Safe and Supported Second Action Plans*² drawing on the expertise of our member organisations supporting children and families in frontline social services across the nation every day.

Supporting children, young people and families early

Q1. What would make the biggest difference in helping children, young people and families get the right support early, before concerns escalate?

Continued focus on Early Supports and Social Determinants of Child Safety and Wellbeing (Action 1, First Action Plan, Action 8 First Aboriginal and Torres Strait Islander Action Plan)

In 2023, the Australian Child Maltreatment Study (ACMS) produced Australia's first nationally representative estimates of the prevalence of five forms of child maltreatment.

² Australian Government Department of Social Services (DSS), *Discussion Paper: Identifying Priorities for the Safe and Supported Second Action Plans* (August 2026). <https://familiesaustralia.org.au/wp-content/uploads/2026/08/Safe-and-Supported-Discussion-Paper.pdf>

The ACMS found that child maltreatment is widespread in Australia, with 62 per cent of the Australian population aged over 16 years reporting experiencing child maltreatment, most commonly exposure to domestic violence (43.8 per cent). The ACMS highlighted that prevention opportunities are needed across the whole human service system to help protect children and families and help them thrive. This means supporting families early in both family formation and identifying emerging family disfunction through coordinated service systems centred on the child and family from the early years into older childhood.

Catholic social service providers recognise the family as the foundational unit of society and the primary context in which children are welcomed, nurtured and formed in dignity, responsibility, solidarity and love. If a loving and well-functioning family is the cornerstone of healthy communities, then government investment should be directed to services and programs that help families flourish and fulfil their responsibilities. We consider this a matter of not only private family life, but social justice. CSSA therefore welcomes continued focus in the Second Action Plan on prevention and early interventions that help keep families safe and well before problems arise or escalate. This includes continued attention on the social determinants of child safety and wellbeing experienced by Aboriginal and Torres Strait Islander children - including poverty, institutional racism and access to services.

CSSA member organisations provide early intervention and prevention services and programs tailored to their communities that support children, young people and families to thrive. These early interventions help to strengthen the protective factors around people, families and communities and reduce known risk factors. Examples include parenting and family-support programs, school engagement and wellbeing initiatives, healthy-relationships and respectful-relationships education.

These services can also help identify problems early before they become a crisis - supporting children, young people, adults and families early enough to prevent harm, disadvantage or vulnerability from developing or becoming entrenched.

Early Intervention and Prevention Models - Child and Family Hubs

National initiatives such as the Australian Government's *Early Years Strategy 2024-2034* emphasise that children and families have interactions with various systems – health, education, disability, family support, social services – that are crucial touchpoints for ensuring early supports are identified and delivered through coordinated investment in children and families from the earliest years.

Catholic social service providers already operate a number of services that fulfil this need, through Child and Family Hubs or operations that align with integrated hub models. Hubs are particularly valuable for families experiencing disadvantage because they reduce the burden of navigating fragmented systems through a 'no wrong door', family-friendly approach that can integrate intake, assessment, referral and service delivery.

Catholic social services occupy a unique place in the sector. As mission-driven services using the principles of Catholic Social Teaching to guide our operations, our services and programs are intentional in seeking preferential options to support those living in poverty, with disadvantage or other vulnerabilities. As Catholic social services often have schools, early childhood education and care (ECEC) services and community services operating within the same broader Catholic ecosystem (schools, health settings), child and family hubs can play a significant prevention and early-intervention role in providing whole-of-family assessments, services planning and navigation support so that the needs of the whole family are identified and supported.

For example, a genuinely integrated hub can coordinate around risk factors that impede family functioning including housing insecurity and financial hardship, mental health struggles, family and domestic violence (FDV), alcohol and other drugs, disability and parenting stress, social isolation and child developmental needs.

This is particularly valuable in many of the regional and remote areas where our members operate, and where access to child and family support services is often fragmented and can be delayed and where families can frequently struggle to navigate multiple systems. Ease of help-seeking can help reduce missed opportunities for early identification and support.

There are also efficiency dividends in the Hubs model. The National Child and Family Hubs network reports that for every \$1 invested in a Hubs program, there are \$2.2 in social benefits realised in Australia.³ CSSA members operating hub-like models can offer ECEC, family assessments and navigation pathways, parenting and family relationship support, and FDV and housing support. This potentially gives government a ready-made network of community infrastructure, including in regional and rural communities where establishing entirely new services is expensive and workforce shortages are severe.

Key opportunities for the Second Action Plans include:

- Further targeted investment for early intervention and prevention services embedded within place-based, Child and Family Hub or hub-like models.
- Discrete funding for 'glue' functions required to engage families and build trust such as Community Engagement and Community Outreach Workers, as well as roles like Community Navigators or Facilitators who can drive local coalitions around aligned and complementary services with a shared vision for success. As noted in the *Aboriginal and Torres Strait Islander National Child and Family Investment Strategy*, programs piloting 'connector' or 'navigator' roles have aided improved pathways and access to services.

³ National Child and Family Hubs Network, 'Child and Family Hubs', *National Child and Family Hubs Network*. <https://www.childandfamilyhubs.org.au/child-and-family-hubs/>

Services and system coordination

Q2. How can child and family services work better together with health, education, disability, housing, justice and family violence services to support children, young people and families?

As the evidence shows, children affected by abuse and neglect often deal with many overlapping services at the same time. Negotiating these systems simultaneously in itself is an additional source of stress, risk and trauma.

The Second Action Plans must continue to play a leadership role in making active and ongoing efforts to map and increase capability for integration and coordination across the broader human service ecosystem, as committed to under the National Framework's, sub-outcome S5.2 'improved connections and collaborations across systems, jurisdictions and policy areas in the areas of safe and stable housing, early childhood education, family law systems, justice services and supports, and disability services'.

This requires more intentional cross-sector relationships, for example between integrated family services, child and youth services, specialist family violence services and services responding to child abuse and sexual assault to better reflect the co-occurrence of risks and the holistic needs of children and young people.

Navigating complex systems with limited resources is a challenge many of our CSSA member organisations face every day in delivering child and family support services. We encourage the Department to enhance efforts in the Second Action Plan aimed at addressing improvements in **service and systems coordination** to disrupt entrenched yet siloed and fragmented practices across service systems that fail to address the multiple drivers of child abuse and neglect. This would include particular attention to:

A child-centred lens on child safety and protection and housing

Our members' services see many young people enter housing insecurity early in life following exposure to family conflict and family and domestic violence. Children are at heightened risk of child safety intervention where families cannot secure stable housing, including when living in refuge or temporary settings. Repeated housing undermines children's wellbeing during key developmental stages and disrupts education, employment and recovery from trauma.

Families, overwhelmingly mothers with children, are increasingly unable to secure or sustain safe housing following separation from violence. This instability is contributing to higher rates of children entering state-based care, not due to neglect or lack of parenting capacity, but because safe and appropriate housing options are unavailable.

Housing insecurity is therefore operating as a pathway into child removal, compounding trauma and disrupting family structures. Access to effective prevention and transition pathways is limited.

Young people often exit care, crisis accommodation or family settings without secure housing options, resulting in repeated or unsafe moves, extended stays in temporary arrangements or early reliance on homelessness services.⁴ These experiences disrupt education, employment and wellbeing, and place young people at increased risk of ongoing disadvantage.

Over time, housing instability becomes normalised with few timely pathways to stable housing once instability begins. Young people learn to manage insecurity rather than expect stability, shaping their relationships, help-seeking behaviour and confidence in achieving long-term housing outcomes. Without timely, well-resourced transition and prevention responses, early housing insecurity is reinforced and carried forward into adulthood.

The Second Action Plans should recognise the criticality of housing as a pre-condition for effective engagement with other systems including education and health, and be able to provide privacy, stability, recovery from trauma.

Currently, the *First Action Plan* includes only one sub-activity focused on housing responses and actions to support children and families affected by FDV. We support increased focus on housing responses under the Second Action Plan, for example:

- Working with states and territories on provision of child-centred crisis and short-term accommodation models. The NSW Core-and-Cluster models provide a good example of families living in their own self-contained, child-friendly accommodation while specialist services are located in a nearby communal 'core'.
- Crisis accommodation designed to accommodate the needs of larger families with children, children with disability and accompanying older male children (12 years +) and their pets.
- Greater investment in Aboriginal and Torres Strait Islander community-controlled organisations that can provide culturally safe, crisis and short-term accommodation that maintains children's connection to family, culture and community.
- Transitional family housing with specialist children's workers, allowing a family to remain in a stable property for up to 24 months while the parent rebuilds towards permanent housing. Critically, specialist children's workers provide personalised, trauma-informed assessment and case planning to children and young people rather than simply being included on their parent's case file.

⁴ Australian Institute of Health and Welfare. (2025). '*Specialist homelessness services annual report 2024–25*.' <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/clients-services-and-outcomes>

A child-centred lens on child safety and protection and youth justice

The recently released final report of the Legal and Constitutional Affairs Reference Committee's inquiry into *Australia's Youth Justice and Incarceration System* in September 2026 highlights the critical need for Commonwealth leadership at the intersection of child protection and youth justice systems. The report highlighted the connection between children whose families are engaged in the child protection system or are in out-of-home care, and who are also engaged with the youth justice system noting that in 2022-23, 65 per cent of young people under youth justice supervision had engaged with the child protection system in the decade prior.⁵

While the report recommends a further inquiry into the factors that contribute to youth incarceration in Australia including access to health, education, disability, community, social and legal services, CSSA members who support youth engaged or at risk of engaging with the youth justice system understand that children cannot feel safe and supported while subjected to punitive custodial approaches.

CSSA supports preventive approaches to youth justice that prioritise early intervention and prevention, rehabilitation, healing, diversion and culturally safety. The Second Action Plans can contribute to national discussions on youth justice reforms recommended in the inquiry, including representation on a cross-portfolio National Child and Community Safety Taskforce which would bring a much needed national approach to better supporting the 'crossover' cohort of children who enter youth justice systems from child protection systems.

Supporting Aboriginal and Torres Strait Islander children and families

Q3. What actions would best support Aboriginal and Torres Strait Islander children and families to stay safe, thrive and remain connected to family, community, culture and Country?

The development of the Aboriginal and Torres Strait Islander Second Action Plan lead by SNAICC under the guidance of the Safe and Supported Aboriginal Leadership Group provides the opportunity for all governments to re-commit to the Framework's shared vision that all children in Australia should grow up safe, supported, reach their potential and be connected to family, community and culture.

CSSA is committed to the self-determination of Aboriginal and Torres Strait Islander people and implementation of Closing the Gap targets and outcomes, including Target 12 to reducing the over-representation of Aboriginal and Torres Strait Islander children in out-of-home care by 45 per cent by the 2031 under the National Agreement.

⁵ Senate Legal and Constitutional Affairs References Committee, *Australia's Youth Justice and Incarceration System* (Final Report, Parliament of Australia, June 2025).
https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000726/toc_pdf/Australia%e2%80%99sYouthJusticeandIncarcerationSystem.pdf, page 21.

CSSA stresses that **Action 8** within the current *Aboriginal and Torres Strait Islander First Action Plan* – Implement the Aboriginal and Torres Strait Islander Placement Principle (ATSICPP) to the standard of active efforts – should continue to be a priority action under the Aboriginal and Torres Strait Islander Second Action Plan.

CSSA is concerned that the recent passing of the *Care and Protection of Children Legislation Amendment (Every Child Matters) Bill 2026* into law in the Northern Territory in August 2026 is inconsistent with commitments made by all governments under Safe and Supported and its commitment to achieving Target 12 under the Closing the Gap National Agreement to address the over-representation of Aboriginal and Torres Strait Islander children in child protection systems and in out-of-home care. The abolishment of the Aboriginal Child Placement Principle undermines efforts to keep Aboriginal and Torres Strait Islander children connected to their families, communities, cultures and Country and overrides evidence that raising First Nations children within their family and communities is critical for their social, emotional, cultural and spiritual wellbeing.

CSSA supports accelerated efforts across governments under **Action 2** of the current Aboriginal and Torres Strait Islander First Action Plan for increased, adequate and coordinated funding of early, targeted and culturally safe supports for Aboriginal and Torres Strait Islander children and families, including specific activities under the National Child and Family Investment Strategy.

Workforce capability and cultural safety

Q4. What is needed to strengthen the child and family workforce so children, young people and families receive safe, high-quality and culturally responsive support?

Build workforce skills across specialist and other services

Community organisations need practical mechanisms for joined-up work, including shared referral pathways, local partnership models, warm referrals, and clear roles between specialist and non-specialist services.

Between child protection and DFV systems: children may be affected by violence but not always receive their own recovery response. Between specialist and mainstream services: non-specialist services may identify risk but lack clear referral pathways or confidence in safe responses. Between adult and child-focused services: support can be fragmented when adult victim-survivor safety, child wellbeing, and perpetrator accountability are handled separately. Between crisis response and long-term recovery: families may receive immediate safety support but lack ongoing healing, parenting, housing, financial, and mental health support.

Support workers, including with the impact of vicarious trauma from working in this field

Frontline workers often encounter situations where child protection and out-of-home care systems are misaligned with family law and justice responses, forcing them to manage complex risks without meaningful pathways to resolve issues driving risks.

Prolonged exposure to these ethical and operational pressures can undermine workforce wellbeing, retention and long-term sector sustainability.

These systemic pressures contribute significantly to workforce moral distress and sustainability challenges across the child and family sector. Practitioners are increasingly required to make safety-critical decisions in environments characterised by severe shortfalls in resourcing and limited support options.

An effective national response to child safety and wellbeing cannot be realised without building and sustaining the workforce required to deliver it. Key considerations for the Second Action Plans include:

- competitive remuneration
- secure employment
- manageable workloads
- professional supervision and specialist capability and clear career pathways, with particular attention to the unique needs and costs required to support rural, regional and remote populations.

CSSA encourages continued Workforce actions under the Second Action Plans including: finalisation of a national approach or strategy for a sustainable and skilled children and family workforce, and finalisation of a stand-alone Aboriginal and Torres Strait Islander workforce development report in collaboration with Early Childhood and Care Development Sector Strengthening Plan.

Both these reports should reference the evidence and findings of the *National Family, Domestic and Sexual Violence Workforce Survey* commissioned under the *National Plan to End Violence against Women and Children 2022-2032*.

Children and young people's perspective and participation

Q5. What guidance, resources, practice tools or supports would help organisations better implement approaches that strengthen children and young people's safety, wellbeing, voice and participation?

Children and young people experiencing forms of neglect and abuse face the same barriers to support that adults do, for example, a lack of available safe and appropriate housing, or a lack of transport or infrastructure to access physical services. Yet, often children and young people continue to be counted as part of a family unit rather than as individuals, undermining focus on services in their own right.

Work with children and young people requires specific skills across a range of therapeutic modalities, in case management and in child development across a range of developmental ages and stages and the size of the child and family workforce possessing specialist skills is limited.

As part of the Workforce Actions within each of the current *First Action Plans*, CSSA considers the scope of works should also consider the child and family workforce's capacity to engage with children in age-appropriate ways in child and family services. Workforce capability should consider available training resources, realistic practice scenarios, supervision tools, communities of practice and safeguarding self-assessment resources that could strengthen the confidence and capability of workers and volunteers.

Resources should be practical, accessible and scalable so that smaller community, regional, remote and faith-based organisations can implement good practice without disproportionate administrative or financial burden.

For Aboriginal and Torres Strait Islander children and young people, this should include recognition of the importance of family, kin, community, culture and connection to Country, and meaningful partnership with Aboriginal and Torres Strait Islander community-controlled organisations.

Accountability, data and measuring progress

Q6. What would help governments, services and communities understand whether the Second Action Plans are improving outcomes for children, young people and families?

While many of the services responsible for child and family wellbeing sit within jurisdictional responsibilities, at the national level, the Second Action Plans increase its efforts in coordinating with other national initiatives that support children, young people and families to be safe through shared governance structures and monitoring and evaluation strategies including: the *National Agreement on Closing the Gap*, *Australia's Disability Strategy 2021-2031*, the *National Action Plan for the Health of Children and Young People 2020-2030*, the *National Children's Mental Health and Wellbeing Strategy*, the *National Mental Health and Suicide Prevention Plan* and *Homes for Australia: A National Plan*.

The proposed additional system and service coordination action across both Second Action Plans would support data sharing, monitoring and evaluations through transparent and annual reports on progress against each action, noting that the Safe and Supported Monitoring and Evaluation Strategy and the Performance Measures Plan have yet to be released.

CONCLUSION

CSSA thanks the Department of Social Services for the opportunity to contribute to consultations on the Safe and Supported Second Action Plans.

The Second Action Plan presents an important opportunity to build on what is already working for children and families in their communities, and in concert with other national plans and strategies that connect prevention, early intervention, response, recovery and healing with the broader systems that shape the lives of individuals, children and families.

We invite the Department to call on the vast knowledge and experience of CSSA members across Australia who deliver services and programs on the ground - investing in, scaling and adapting approaches that are already demonstrating impact. We know much about what works. The task now is to connect that knowledge across systems, back it with sustained investment and accountability, and translate it into coordinated actions that ensure all children and young people in Australia have the right to grow up safe, connected and supported in their family, community and culture.

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