



**AbSec**

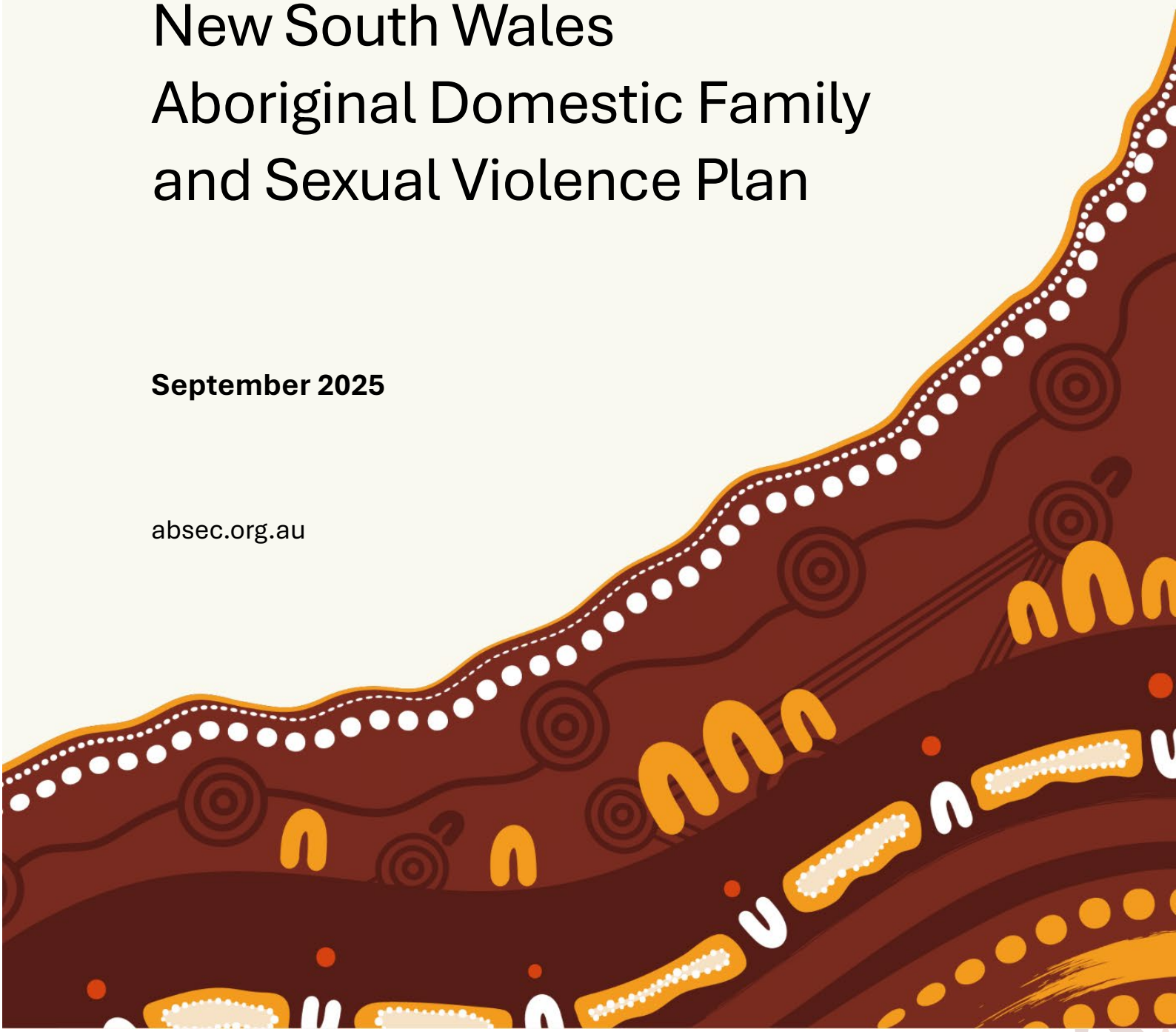
NSW Child, Family & Community  
Peak Aboriginal Corporation

Submission to the

# New South Wales Aboriginal Domestic Family and Sexual Violence Plan

**September 2025**

[absec.org.au](http://absec.org.au)



## Acknowledgement of Country

AbSec acknowledges the Gadigal and Wangal People of the Eora Nation, the land on which our office stands, and pay respect to Elders past, present and emerging. We acknowledge the Elders, leaders and advocates within our sector and pay our respects to them as knowledge holders within this space and every space.

AbSec acknowledges the Stolen Generations who never came home and the ongoing impact of government policy and practice on Aboriginal and Torres Strait Islander children, young people and families.



# AbSec

NSW Child, Family & Community  
Peak Aboriginal Corporation

## Who We Are

AbSec, the principal authority for Aboriginal children, young people, and families in New South Wales, champions the rights to self-determination and culturally secure, community-directed services. As the NSW Child, Family and Community Peak Aboriginal Corporation, our advocacy is anchored in the Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP).

We are dedicated to addressing the disproportionate representation of Aboriginal children and young people in out-of-home care (OOHC) and to enhancing outcomes across our communities. As a member of the NSW Coalition of Aboriginal Peak Organisations (NSW CAPO) and the lead organisation for Target 12, AbSec also co-chairs the Families and Justice Sector Committee within the NSW Closing the Gap (CTG) partnership agreement.

We are pleased to present this submission to the Fair Work Commission review of gender-based undervaluation in the Social, Community, Home Care and Disability Services (SCHADS) Award 2010.

## Overall plan

We welcome the opportunity to provide a submission on the draft *NSW Aboriginal Domestic, Family and Sexual Violence Plan 2026–2030*. The development of this Plan represents an overdue and necessary step in responding to the unacceptable levels of violence experienced by Aboriginal and Torres Strait Islander women, children, families and communities. We welcome the recognition in the draft Plan of the historic and ongoing legacy of colonisation, systemic racism, and intergenerational trauma, while attempting to position Aboriginal communities as central to solutions.

There are also opportunities to improve and strengthen the draft Plan, so it delivers on its stated ambition of transformative change. The effectiveness of the Plan will depend on its ability to transform the systems that continue to punish rather than protect Aboriginal women, children and families who have experienced violence. This includes ensuring Aboriginal governance and oversight of the DFSV Plan and recommend that this must consider oversight of strategies to address the abuse including sexual abuse of Aboriginal and Torres Strait Islander children in the child protection and youth justice systems. The latter needs to be made much more explicit in the final Plan; and includes specifying accountabilities for agencies such as the Department of Communities and Justice that fail to prevent the sexual abuse of our children in statutory care.

The intersections of child protection, housing, and DFSV responses expose Aboriginal mothers to impossible choices: whether to remain in violent homes and risk their children being removed from them, or to leave and face homelessness or unsuitable housing, which also increases the risk of their children being removed from them.

The final Plan must clearly evidence ways that cultural change will be transformed too, and agency performance and accountability made transparent and measurable. For example:

- blaming Aboriginal and Torres Strait Islander women's emotional reactions and responses from the impacts of trauma and DFSV, by calling the reactions mental health issues.
- blaming Aboriginal and Torres Strait Islander children's emotional reactions and responses from the impacts of trauma and DFSV, by calling the reactions mental health issues or challenging behaviours.
- Police misidentification of Aboriginal and Torres Strait Islander women as perpetrators of DFSV.

This cycle demonstrates how current systems punish mothers and children for the violence they experience, instead of providing safety and support to remain together. Breaking this cycle requires systemic reform across government, in partnership with Aboriginal communities and consistent with commitments that the NSW Government made under the National Agreement on Closing the Gap.

This submission is informed by feedback from AbSec's membership, the New South Wales Coalition of Aboriginal Peak Organisations (NSW CAPO), and what we have heard through our ongoing work with our communities. Our submission also draws on key lessons from the independent Aboriginal-led Closing the Gap Review (2025) conducted by Jumbunna Institute, the Family is Culture Review Report, and decades of Aboriginal advocacy. This submission has been structured in line with the parameters outlined by Nous Group and Curijo, due to the restrictions on character limits, we have listed recommendations at the end of each section.

## The need for partnership in systemic reform

As highlighted in the Family is Culture Review and the Independent Aboriginal and Torres Strait Islander-led Review of Closing Gap, led by University of Technology Sydney Jumbunna Institute of Indigenous Education and Research (Jumbunna Review) (2025), structural barriers, rather than lack of plans, are the primary cause of delays in transforming systems which continue to systemically discriminate against Aboriginal and Torres Strait Islander children, families and communities. Jumbunna's review found that governments consistently fail to meet Closing the Gap targets because:

- Decision-making power remains with governments rather than being shared with Aboriginal communities.
- Funding is still disproportionately directed to mainstream services instead of Aboriginal Community Controlled Organisations (ACCOs).
- Government accountability mechanisms are weak, fragmented, or absent.
- Data is controlled by governments, with limited sharing or investment in Aboriginal community data capacity.

These findings directly apply to the DFSV Plan, with feedback from multiple respondents noting concerns about insufficient community engagement and partnership with Aboriginal peak bodies in the development of the Plan. Unless power is genuinely shared, resources flow to Aboriginal community-led solutions, and accountability is independently enforced, the Plan risks repeating the shortcomings of past strategies.

## Clarity of roles, responsibilities, and actions

The draft Plan outlines broad strategies but lacks the level of specificity required to drive change. To be effective, each priority area must be broken down into practical action steps, including:

- **Lead and partner organisations:** Clearly identify which government agencies, NSW CAPO leads, ACCOs, and other stakeholders are responsible.
- **Timeframes:** Define when actions will be achieved in the short, medium, or long term.
- **Resources:** Commit the necessary investment to deliver each outcome.
- **Outcomes and indicators:** Link actions to measurable changes, such as reductions in child removals related to DFSV, increased Aboriginal community-led service provision, or improved access to safe housing.

This approach will allow communities to see exactly who is responsible, what actions are being taken, and how progress will be measured.

## Accountability and monitoring

Too often, government plans are not implemented in full, or progress is self-assessed without independent scrutiny and oversight. To avoid this, the Plan must embed robust accountability measures, including:

- A monitoring and evaluation framework with Key Performance Indicators (KPIs) for government and community-led feedback loops.
- Public reporting, in accessible formats, so Aboriginal families and communities can track progress and hold government to account.
- Clear timeframes and accountabilities, tied to the investment required to achieve outcomes.

The Jumbunna Review recommended embedding systemic change into leadership contracts and establishing independent accountability mechanisms. These recommendations should be incorporated into the Plan's implementation framework to demonstrate genuine accountability and commitment to delivering this Plan at the highest levels of government.

The Plan should also include actions about establishing an independent Aboriginal and Torres Strait Islander Children's Commissioner and a Child Protection Commission to provide oversight and accountability for system transformation and to ensure Aboriginal voices, particularly those of children and young people, are central to decision-making, and prevent governments from assessing their own progress in isolation.

### Aboriginal and Torres Strait Islander children and young people

Children and young people must be seen not only as victim-survivors but also as advocates with agency and voices of their own. The Plan should:

- Provide tailored services that respond to their unique experiences of violence.
- Establish mechanisms for children and young people to contribute feedback to the Plan, ensuring they can shape reforms that affect their lives.

Elevating children's voices aligns with both the principles of self-determination and international human rights obligations.

### Indigenous data sovereignty and governance

Indigenous data sovereignty and governance must be recognised as a cross-cutting principle, not simply a subset of Priority Reform 4. Aboriginal communities must be supported to:

- Collect and manage data relevant to DFSV.
- Use data to measure progress, advocate for change, and design community-led solutions.
- Ensure that data reflects strengths and priorities, rather than deficit-based government narratives.

Investment in Aboriginal community-led data infrastructure is essential for long-term accountability and community empowerment.

### Cross-system Reform

The programmatic response required is fundamental, not incremental. Current arrangements leave mothers trapped: unsafe if they stay in violent homes, but at risk of losing their children if they leave. Addressing this requires:



- Reforming mandatory reporting frameworks so that information-sharing does not expose families to punitive interventions and means that Aboriginal and Torres Strait Islander women and children are too fearful to seek support from health, education, policing and family support services including those provided by ACCO/ACCHOs because *‘DOCS <DCJ> will get involved.’*
- Expanding safe, culturally appropriate and affordable housing options for mothers and children escaping violence.
- Ensuring child protection systems support, rather than penalise, mothers seeking safety and keep children and mums safe and together.

These reforms cannot occur within the DFSV sector alone. They require a whole-of-government approach, consistent with the National Agreement’s Priority Reforms and led through the Closing the Gap Transformation Sector Committee. Locating this Plan within the Families and Justice Sector Committee lacks the necessary whole-of-government focus and accountability for advancing transformative change.

## Conclusion on overall plan

The Plan must articulate a clear, accountable, and systemic pathway to transformation. This requires:

- Recognising and addressing the intersections of DFSV, child protection, and housing.
- Setting specific, measurable objectives with clear actions, timeframes, and accountabilities (e.g. using a SMART action plan approach that clearly identifies which agency is responsible for what, how and by when).
- Embedding independent oversight through a NSW Commissioner for Aboriginal Children and Young People and a NSW Child Protection Commission
- Positioning children and young people as advocates, not only as victim-survivors.
- Embedding Indigenous data sovereignty and governance as a core principle.
- Driving cross-system reform in partnership with Aboriginal communities, consistent with the National Agreement and informed by the Jumbunna Review.

Only by embedding these reforms will the Plan avoid repeating past failures and deliver genuine safety, healing and justice for Aboriginal women, children, families and communities.



## Opening sections

### The imperative for genuine transformation

The Jumbunna Review (2025) found that progress under Closing the Gap has been slow, not because of a lack of commitments, but because governments have failed to genuinely implement the Priority Reforms. In particular, governments continue to retain power, control funding, and impose externally designed solutions, rather than sharing decision-making authority with Aboriginal communities. The Review highlighted that:

- Systemic change must be embedded in leadership contracts and KPIs (Rec. 2a)
- Aboriginal Community Controlled Organisations (ACCOs) must be equitably resourced to deliver outcomes (Rec. 3a).
- Independent accountability mechanisms must be established (Rec. 4a).
- Community data capability and infrastructure must be built, and data shared as a matter of priority (Recs. 7b & 7c).

These findings are directly relevant to the draft DFSV Plan. Unless power is shared, ACCOs are funded equitably, and independent accountability is embedded, this Plan risks repeating the pattern of symbolic recognition without structural change.

### Case studies of Aboriginal-led excellence

The draft Plan refers to “exemplary DFSV services designed and led by Aboriginal people and communities”. These examples should not remain confined to appendices or consultation notes. Rather, they must be elevated as core evidence of what works, demonstrating that culturally grounded, community-controlled models consistently achieve better outcomes than mainstream services. For example, the final Plan should include detailed case studies of community-run safe houses, on-Country healing programs, or Aboriginal women’s leadership initiatives. These will strengthen the Plan legitimacy and provide practical models for sustained investment.

### Community violence

While the Plan rightly addresses family and intimate partner violence, the Plan should also recognise the reality of community violence. In some circumstances, violence may be perpetrated by known community members against a family, woman, man, or child. Where victims are not from the same community as perpetrators, they may face increased risks, including forced displacement when communities protect perpetrators rather than victims.

This form of violence requires specific recognition, with tailored strategies to ensure victim-survivors are not doubly punished by losing both safety and community.

### Responsibility for a whole-of-system response

On page 14, the draft Plan states:

*“The Plan acknowledges that broader societal actors – such as workplaces, education institutions and media platforms – also carry a deep responsibility to challenge and dismantle the structural inequalities, racism, and systemic drivers of violence, it is however beyond the scope of this document to determine specific responsibility and actions for these actors.”*

We are concerned that this framing artificially narrows the Plan’s ambition. The drivers of DFSV are structural and cannot be addressed by the DFSV sector alone. To confine the scope risks reinforcing siloed responses.

We therefore recommend that responsibility for the Plan sits with the Transformation Sector Committee under the NSW Closing the Gap architecture and co-led by the Aboriginal Women’s Advisory Network and the Aboriginal Legal Service NSW/ ACT Ltd. This supports cross-portfolio engagement with housing, health, education, justice, policing, and child protection systems. It aligns with Priority Reform 3 of Closing the Gap, which requires governments to transform their organisations to address systemic racism and structural barriers. Without such an approach, the Plan will not address the intersections of DFSV with housing insecurity, over-policing, or child removal, all of which drive further violence and trauma.

## Embedding truth-telling and accountability

The draft Plan rightly begins with truth-telling, acknowledging the enduring harms of colonisation, systemic racism, and intergenerational trauma. However, truth-telling must be linked to accountability and action. For too long, reports and plans have acknowledged harms without delivering change. We recommend that each opening section of the final Plan include a clear statement of government accountability, outlining not just recognition of the past, but commitments to concrete and specific reforms.

## Recommendations for strengthening the opening sections

1. Embed findings of the Jumbunna Closing the Gap Review (2025) throughout the Plan, particularly regarding systemic change, resourcing of ACCOs, independent mechanisms, and Indigenous data sovereignty and governance.
2. Elevate Aboriginal community-led case studies as core evidence within the Plan, not just appendices, highlighting community-controlled success stories as models for sustained funding and expansion.
3. Shift responsibility for the Plan’s oversight to the Transformation Sector Committee, co-led by the Aboriginal Women’s Advisory Network and the Aboriginal Legal Service NSW/ ACT Ltd to enable whole-of-system responses across housing, health, justice, education and child protection.
4. Strengthen the truth-telling sections by linking acknowledgment of harm directly to government accountability and measurable commitments.

Taken together, these changes will position the Opening Sections of the Plan not only as a statement of recognition, but as a foundation for meaningful, systemic transformation.

## Plan on a Page, Vision and Goal

The draft Plan presents four options for a vision statement. We support the intention to seek community feedback and co-design the language of the final vision. We recommend combining Options 3 and 4, which together best capture the principles of power, self-determination, and accountability to Aboriginal communities.

A strong vision must do more than describe aspirations. The vision must clearly signal a structural shift in power. It must affirm that Aboriginal women and communities will determine responses to DFSV, and that governments and services are accountable to them.

### Recommended vision statement

*“Power is shifted back to Aboriginal and Torres Strait Islander women and communities to make decisions about responses to DFSV. Investments and services are guided by community-controlled governance structures and reformed systems that are accountable to Aboriginal and Torres Strait Islander people and enable self-determination. Stronger, safer communities are resourced to design and deliver supports that reflect their needs, priorities, and cultural strengths.”*

Adopting a combined vision of community-led governance and accountability is more than rhetorical. It commits to:

- Aboriginal women and communities determining responses to DFSV.
- Community-controlled governance structures guiding investment.
- Mainstream services are accountable to Aboriginal and Torres Strait Islander people.
- Systems embedding Aboriginal oversight, not simply consulting.

This approach reflects the Priority Reforms of Closing the Gap, especially shared decision-making, building the Aboriginal community-controlled sector, transforming government organisations, and shared data and accountability. It aligns with the findings of the Jumbunna Review, which found that plans fail because governments retain control rather than sharing power, funding, and accountability.

### Goal of the plan

The draft Plan’s Goal aligns with Closing the Gap Socioeconomic Outcome 13: that families and households are safe, and that by 2031 the rate of all forms of violence and abuse against Aboriginal and Torres Strait Islander women and children is reduced by at least 50%, as progress towards zero.

We strongly support this goal but emphasise that progress will only occur if the Plan is embedded within the full suite of NSW and national frameworks, including:

- The NSW Domestic and Family Violence Plan.
- The NSW Sexual Violence Plan.



- The NSW Strategy for the Prevention of DFSV.
- The NSW DFV Workforce Strategy.
- The National Plan to End Violence Against Women and Children.
- The National Aboriginal and Torres Strait Islander Action Plan.
- *Safe and Supported: The National Framework for Protecting Australia's Children.*

To these, we recommend the explicit inclusion of the Family is Culture Review Report. The 126 recommendations are the critical roadmap for reforming the NSW child protection system to be responsive to Aboriginal and Torres Strait Islander children, families and communities. Without implementation of these recommendations, Aboriginal and Torres Strait Islander mothers will continue to face the impossible choice between staying in violent households or losing their children to removal. This structural injustice directly undermines the goal of the Plan.

### Linking vision and goal to accountability

Vision statements risk becoming symbolic unless paired with mechanisms for accountability. To avoid repeating past failures, we have outlined in our opening sections the importance of clear roles, responsibilities, and actions as well as independent accountability and oversight.

### Recommendations for strengthening the vision and goal

1. Adopt a combined Vision (Options 3 & 4) that explicitly commits to power-sharing, Aboriginal-led governance, and accountability.
2. Embed Family is Culture Review recommendations alongside other linked strategies, ensuring radical reform of the child protection system is central to achieving safety.
3. Develop measurable targets and indicators linked to the Goal, covering child protection, policing, housing, and service commissioning outcomes.
4. Establish independent accountability and oversight through the establishment of a NSW Commissioner for Aboriginal Children and Young People and a Child Protection Commission.
5. Commit to transparent public reporting against Closing the Gap targets and Plan-specific indicators, with accessible formats for communities.

By strengthening the Vision and Goal in these ways, the Plan will move beyond symbolic statements to a meaningful blueprint for systemic change, community control, and measurable progress.



## Draft Submission - Priority Reforms

### Priority Reform 1

The Plan needs a stronger focus on NSW Government's role as steward to support self-determination. The introductory section should clearly outline the scale of change required to achieve Socioeconomic Outcome 13. Priorities for Action must be consolidated, with clear timeframes and accountabilities, framed as KPIs.

- In partnership with Aboriginal communities, AbSec and the Minister for Children and Families could make use of Sections 11 and 12 of the NSW Care and Protection Act, to provide a pathway to self-determination (s11) and participation in decisions (s12). This can draw on international human rights jurisprudence and existing procedural rights. Routine mandated training for magistrates is also required, ensuring consistent understanding and implementation of these provisions, particularly for Aboriginal and Torres Strait Islander children, families and communities.
- The Plan should also incorporate recommendations from the Jumbunna Review of Closing the Gap, including:
  - Rec. 2: Embedding systemic change into leadership contracts and KPIs.
  - Rec. 3: Resourcing ACCOs to equitably deliver on shared outcomes.
  - Rec. 4: Implementing independent mechanisms.
  - Rec. 7B: Building community data capability and infrastructure.
  - Rec. 7C: Sharing data as a matter of priority.

### Priority Reform 2

We support the Plan's direction but recommend stronger, more concrete commitments.

- Transition of Case Management: Government and non-government organisations must develop and implement strategies for transferring clients to Aboriginal organisations across DFSV and child protection. KPIs should be included within DCJ and the non-ACCO sector to support this, and DCJ should transition funding to ACCOs to provide information, advice and assistance to Aboriginal and Torres Strait Islander people as contracts are re-commissioned or expire.
- Promising programs: Identify Aboriginal community-led and community-controlled initiatives currently underway across NSW that show promising outcomes in reducing DFSV against Aboriginal and Torres Strait Islander people and set out how these can be replicated and scaled. **These programs must receive sustained, flexible funding.**
- Workforce: Significantly expand and better support the Aboriginal workforce across ACCOs, the DFSV sector and related services. This includes workforce planning, DFSV qualification pathways, cultural supports, peer and team supports, and strategies for lived-experience workers. **The Plan must ensure pay parity with government (rather than "fair remuneration").**



- Aboriginal peaks: Commit to supporting, strengthening and expanding the role of Aboriginal peak bodies, networks and organisations advocating for the safety of our women, children and priority populations across NSW. **This requires concrete actions with clear accountabilities and KPIs.**
- Commissioning: Expand Aboriginal-led commissioning for DFSV responses, including place-based commissioning across NSW. **This must include a review and reform of strategies to transition mainstream services to ACCO services, particularly in child protection and out-of-home care.**

### Priority Reform 3

Government transformation also means dramatically limiting government involvement in the lives of Aboriginal people, children and families, and recognising governments as custodians and stewards of self-determination.

- Service integration: Commit to an integrated, holistic, culturally safe, trauma-informed service system that supports Aboriginal and Torres Strait Islander people across the life course. **The Plan should specify strategies for integration, such as increased information sharing, mapping of services and Aboriginal Community Controlled Mechanisms acting as central governance points.**
- Law reform oversight: Establish mechanisms for Aboriginal expert oversight of existing and new law reforms that involve Aboriginal and Torres Strait Islander people impacted by DFSV. **This should occur through Closing the Gap architecture (NSW CAPO), to avoid siloed governance structures which undermine the standards for partnership outlined in the National Agreement on Closing the Gap.**
- First responder models: Develop alternative, non-police first responder models that focus on place-based, localised, community-led approaches. **These must be funded through flexible and sustainable funding to ACCOs.**
- Child protection reform: Transform the child protection system to place Aboriginal families and communities at the centre of decision-making. **Active efforts are required to support Aboriginal mothers and families seeking support for DFSV, including ensuring children are not removed simply because the government's failure to provide suitable and accessible housing punishes mothers who leave violence without access to housing and punishes mothers who remain in a violent relationship.**

### Priority Reform 4

This Reform requires stronger emphasis on overcoming information sharing and data barriers that prevent Aboriginal and Torres Strait Islander families from fully participating in decisions about their children.

- AbSec and the Aboriginal Legal Service (NSW/ACT) should work in partnership with the Minister for Children and Families to address persistent information-sharing and confidentiality limitations. This will enable self-determination, participatory approaches, and better-informed decision-making across reforms such as the ACMP, ACCMs, and new restoration frameworks.



- Invest in data infrastructure for ACCOs, enabling them to act as custodians of data. This ensures Aboriginal communities control their own information and can use it to strengthen advocacy, service delivery and accountability.

## Conclusion on Priority Reforms

The draft Plan can be strengthened by embedding the following across all reforms:

- Consolidated priorities with timeframes, accountabilities, and KPIs.
- Mandated training, pay parity, and workforce expansion.
- Transfer of clients and funding from mainstream NGOs to ACCOs.
- Community-led integration, law reform oversight, and non-police response models.
- Transformation of child protection to support, not punish, Aboriginal mothers and children and young people.
- Data sovereignty and infrastructure for ACCOs.

These changes will ensure that Priority Reforms deliver tangible, systemic transformation, rather than remaining aspirational statements.



## Pillars

As mentioned in above sections, it is imperative that the Plan recognises the complex network of discriminatory and abusive systems which can perpetrate violence against Aboriginal women, children and families. It was noted by several stakeholders that Aboriginal and Torres Strait Islander women are often pathologised or criminalised by systems when seeking support. Very real fears of incarceration or child removal exacerbate the already isolating and coercive nature of DFSV. To address the multilateral systemic barriers which impact Aboriginal and Torres Strait Islander victim-survivors of DFSV, it is imperative that a whole-of-system response is clearly articulated within the Plan.

### Primary prevention

The Plan should include a dedicated focus on programs for Aboriginal and Torres Strait Islander boys, young men, and men. These programs must strengthen connections to culture, community mentors, and Country and provide targeted supports for young people transitioning from out-of-home care, juvenile justice, and adult incarceration.

NSW Government and NSW CAPO leads should commission an Aboriginal community-led training program to educate Aboriginal children, young people and adults on healthy relationships and DFSV.

Investment in these areas is critical to break intergenerational cycles of violence and disadvantage, and to support young men to grow into strong, healthy and culturally grounded leaders who can self-regulate and have healthy relationships.

### Early intervention

Current early intervention responses are highly fragmented and inconsistent, with different systems (police, housing, education, child protection) applying different approaches to assessing risk and safety. This results in confusion, duplication, and inequitable and discriminatory outcomes for Aboriginal and Torres Strait Islander families. It is also unclear how individual agencies see their own role in early intervention and assisting Aboriginal children, young people and women at risk of DFSV to avoid problem escalation. This goes much further than agencies solely seeing their role as making referrals to specialist services or making notifications of risk of significant harm (ROSH) to DCJ.

The education system is also increasingly unsafe and prone to sharing sensitive information with other agencies, which disproportionately disadvantages Aboriginal and Torres Strait Islander children.

To address these gaps, we recommend the setting out of sector-specific accountabilities and the need to establish sector-specific guidance documents. These resources should clearly outline each system's responsibilities under the Plan and provide practical direction for culturally safe, consistent engagement with, and early support to Aboriginal women, children and families at risk of DFSV.



## Response

The current Plan does not adequately respond to the complex realities faced by Aboriginal women, children and families in crisis situations. Key issues include:

- **Sexual exploitation in out-of-home care:** The experiences of young Aboriginal and Torres Strait Islander people, particularly girls and young women, subjected to sexual exploitation in OOHC are absent from the Plan. Tailored supports must be developed to address these harms.
- **Exclusion of teenage boys from refuges:** Restricting access to women's refuges for teenage boys over 13 places mothers in untenable situations—forced to either remain in violent homes or separate from their children. The Plan should acknowledge that boys and young men in these circumstances are also victims of violence and require support to remain safely with their mothers.
- **Help-seeking discouraged by child protection reporting:** Young people accessing homelessness services are frequently reported to child protection authorities, discouraging them from seeking help. Services must move beyond punitive, institutional responses and reflect Aboriginal values of care, connection, and community.

Recommendation: Invest in a network of Aboriginal-led Youth Respite and Crisis Centres that provide:

- 24/7 Aboriginal-run respite services embedded within community.
- On-Country programs that combine healing, education, and cultural reconnection.
- Culturally safe therapeutic placements that keep children close to kin and Country.

## Conclusion on Pillars

Strengthening the Plan's Pillars requires:

- Culturally grounded prevention programs for Aboriginal and Torres Strait Islander boys, young men, and men.
- Clear guidance for systems to ensure consistent, safe approaches to risk and intervention.
- Recognition of the specific vulnerabilities of Aboriginal and Torres Strait Islander girls in OOHC.
- Removing barriers that separate mothers from their teenage sons in crisis accommodation.
- Establishing Aboriginal-led, community-based crisis responses, including respite hubs, therapeutic facilities, and On-Country programs.

These measures will ensure prevention, early intervention, and crisis responses are not only more effective but also reflect Aboriginal and Torres Strait Islander values of care, connection and community.

## Implementation

Effective implementation will determine whether the Plan achieves its intended outcomes. Aboriginal and Torres Strait Islander communities have consistently highlighted that many government strategies fail not because of poor design, but because commitments are not implemented and monitored and agencies, particularly government agencies, are not held to account for their failures to deliver outcomes. For this Plan to be different, it must embed a strong implementation and independent monitoring framework to deliver transformation.

## Transformational governance

Implementation must align with Priority Reform 3 of the Closing the Gap Agreement, which requires government transformation. The current draft does not go far enough in ensuring cross-government collaboration.

We recommend that responsibility for implementation sit with the Transformation Sector Committee in the NSW Closing the Gap architecture. Co-led by the Aboriginal Women's Advisory Network and the Aboriginal Legal Service NSW/ACT Ltd, this offers:

- Centralised governance capable of driving reform across portfolios such as housing, health, policing, education, and child protection.
- A mandate to address the intersections of violence, housing insecurity, health inequities, and child protection involvement, which cannot be resolved by the DFSV sector alone.
- A structure that is consistent with Aboriginal and Torres Strait Islander calls for whole-of-system responses, rather than siloed planning.

## Independent oversight and accountability

Experience shows that implementation falters when governments self-monitor and there are no independent and trusted systems for measuring progress and holding government accountable.

AbSec recommends establishing a NSW Commissioner for Aboriginal Children and Young People and a NSW Child Protection Commission with statutory authority to:

- Monitor cross-system reforms.
- Ensure children's voices and experiences are embedded in implementation.
- Hold governments accountable through independent reporting to Parliament.

The Commissioner and NSW Child Protection Commission would complement existing Closing the Gap accountability structures and ensure reforms specific to DFSV are not siloed or deprioritised. These structures also implement NSW government commitments as part of *Safe and Supported* and recommendations from *Family is Culture Review*.



## Implementation roadmap

Implementation requires a practical roadmap that breaks down high-level commitments into clear, measurable actions. Each action should specify:

- Lead and partner organisations (government agencies, ACCOs, NGOs).
- Timeframes for delivery (short, medium, long term).
- Resources required to achieve outcomes.
- Measurable indicators, linked to Closing the Gap targets and DFSV-specific goals.

This roadmap should be developed in partnership with ACCOs and Aboriginal peak bodies to ensure actions reflect community priorities and local contexts.

## Monitoring and evaluation

The draft Plan should specify a monitoring and evaluation framework. This framework should include:

- Key Performance Indicators (KPIs) aligned to the Goal of reducing violence by at least 50% by 2031, as well as other measures such as reductions in child removals linked to DFSV, increases in Aboriginal-led commissioning, and improvements in housing access.
- Feedback loops allowing Aboriginal and Torres Strait Islander communities to track progress, identify gaps, and influence course corrections.
- Regular public reporting, accessible to communities, to ensure transparency and demonstrate commitment.

Embedding Aboriginal data sovereignty principles in monitoring and evaluation is essential. ACCOs must be resourced to collect, manage, and use data to measure whether reforms are working for their communities.

## Resourcing implementation

Successful implementation requires sustained, flexible funding. Too often, Aboriginal community-led initiatives are supported through short-term grants that undermine continuity and stability. Funding must:

- Prioritise ACCOs.
- Be guaranteed over the life of the Plan.
- Enable ACCOs to scale promising approaches.



## Conclusion on Implementation

The success of the Plan depends on its delivery. To ensure reforms are implemented and outcomes achieved, we recommend:

1. Embedding Plan implementation within the Transformation Sector Committee.
2. Establishing an NSW Commissioner for Aboriginal Children and Young People and a NSW Child Protection Commission to provide independent and trusted oversight and accountability.
3. Developing a detailed implementation roadmap with clear leads, timeframes, resources, and indicators.
4. Embedding a monitoring and evaluation framework that supports data sovereignty, with regular, public reporting and community feedback loops.
5. Ensuring sustained, flexible funding for ACCOs to lead and expand responses.

By adopting these measures, the Plan will avoid the shortcomings of past strategies and deliver the transformational change that Aboriginal women, children, families and communities deserve.



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**Purpose of the Submission**

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