



Working with
Women Alliance

Submission

Establishment of an Accreditation Scheme for Children's Contact Services

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Submitted by

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Acknowledgement of Country

The Working with Women Alliance (WwWA) acknowledge the Traditional Owners of the land on which we work and live. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present and future. We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge. We extend our respect to Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and always will be Aboriginal land. We acknowledge the strength of Aboriginal and Torres Strait Islander people and communities. We acknowledge that Australian governments have been complicit in the entrenched disadvantage, intergenerational trauma and ongoing institutional racism faced by Aboriginal and Torres Strait Islander people. We recognise that Aboriginal and Torres Strait Islander people must lead the design and delivery of services that affect them for better life outcomes to be achieved.

About Us

The Working with Women Alliance (WwWA) represents two key portfolios: National Women's Safety (NWS) and National Women's Equality (NWE). The WwWA connects the critical areas of gender-based violence prevention and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact. We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Executive Summary

Children's Contact Services (CCS) sit at the frontline of child safety in family law. They are relied upon when families are grappling with violence, abuse, trauma, and high conflict—yet Australia has no national accreditation scheme to guarantee that these services are consistently safe, professional, and accountable.

The result is unacceptable: children face a postcode lottery of standards, staff may be underqualified, and families lose confidence in a system meant to protect them. Even one failure in safety can have lifelong consequences.

A high regulatory accreditation framework is the only way to close these gaps. While upfront investment is significant, the benefits are greater:

- Stronger protection for children through mandatory safety protocols and professionalised staff;
- Public confidence restored through independent oversight, transparency, and accountability;
- Long-term savings, with prevention reducing the billions currently spent on justice, health, and child protection responses to harm;
- National consistency, ensuring no child is left behind because of geography or cost.

Anything less than comprehensive reform risks perpetuating harm and undermining Australia's obligations under the Family Law Act 1975 and the United Nations Convention on the Rights of the Child.

This submission calls on government to invest in the only model that delivers safety, equity, and trust: a high regulatory accreditation framework for Children's Contact Services.

Recommendations

- Adopt a High Regulatory Accreditation Framework for all Children's Contact Services, with nationally consistent and enforceable standards.
- Require practitioner registration and minimum qualifications, with ongoing professional development in trauma-informed, child-focused, and culturally safe practice.
- Establish an independent national regulator to oversee accreditation, audits, complaints, and sanctions for non-compliance.
- Provide stable, multi-year Commonwealth funding, including workforce development and equity measures to ensure access in rural and disadvantaged areas.
- Guarantee equitable access by capping user fees and introducing automatic waivers for low-income families so no child is excluded due to cost.

Considerations

Safety and Economic Imperative

Children who rely on Children's Contact Services (CCS) are among the most vulnerable in the family law system. The Federal Circuit and Family Court reports that the majority of cases involving CCS feature allegations of family violence, child abuse, or other high-risk factors.¹ For these children, inconsistent safety practices or inadequately trained staff can have devastating consequences. Even a single failure in supervision or risk assessment may expose a child to immediate harm or lifelong trauma.

A high regulatory accreditation framework is the only model that provides certainty. By mandating enforceable safety protocols, rigorous practitioner qualifications, and independent oversight, a national scheme ensures that child safety is non-negotiable. Anything less risks perpetuating the dangerous inconsistencies that currently exist across services.² This obligation is not merely a matter of good policy but of human rights: under the United Nations Convention on the Rights of the Child, Australia must ensure that children's best interests are a primary consideration and that they are protected from all forms of harm.³

The financial case for strong accreditation reinforces the moral argument. Poorly regulated CCS increase the likelihood of adverse incidents that escalate into child protection notifications, prolonged court disputes, and repeat litigation. These outcomes impose significant costs on families, communities, and government. Research by the Australian Institute of Family Studies shows that children exposed to ongoing conflict or unsafe contact environments experience long-term developmental and health consequences, including higher rates of mental health service use, reduced educational attainment, and increased welfare dependency.⁴

These outcomes translate into billions of dollars of public expenditure across the justice, health, and social service systems.⁵ By contrast, investing upfront in a high regulatory accreditation framework prevents harm before it occurs. Every dollar spent on prevention yields multiple dollars in avoided system costs, creating a positive social return on investment. High-cost implementation is therefore not only a moral and safety imperative but also an economically responsible reform.

Equity, Trust, and International Best Practice

Access to safe Children's Contact Services (CCS) in Australia remains inconsistent and inequitable. Families in metropolitan areas are more likely to reach well-resourced, government-funded centres, while those in rural and regional areas often rely on under-regulated or inconsistent providers.⁶ This postcode lottery undermines public trust in the family law system and leaves disadvantaged communities further behind.⁷

A high intervention accreditation framework is the only way to close this gap. By mandating national standards, practitioner qualifications, and transparent complaints mechanisms, it ensures that all children, regardless of location or family circumstances are afforded the same level of safety and care. Public registers and independent oversight also build confidence for families, courts, and communities. When CCS are perceived as unsafe or unfair, families disengage, and children are left at greater risk.

International experience confirms that comprehensive regulation works. In the United Kingdom, Ofsted accreditation and inspections have lifted workforce professionalism and reduced safety complaints. Canada's provincial licensing systems set strict requirements for staff training, physical environments, and accountability processes. In New Zealand, accreditation embedded within family justice reforms has strengthened trauma-informed practice and cultural safety.⁸

The evidence is unambiguous: jurisdictions that invest in high-cost regulation achieve measurable improvements in child safety, service quality, and public trust. "Light-touch" or voluntary models fail to eliminate unsafe practices or guarantee consistency. Australia now has a clear choice: lead with best practice and protect vulnerable children, or risk falling behind its peers by accepting inadequate reform. For children at risk, there is no middle ground.

The Economic, Workforce and Implementation Case for high-Cost Reform

While the costs of a high intervention accreditation framework are significant, they must be understood as an investment in prevention rather than an expenditure. Research consistently demonstrates that the cost of failing to protect children far outweighs the cost of implementing robust safeguards. For example, modelling of child maltreatment costs in Australia estimates that the lifetime economic burden of abuse and neglect exceeds \$20 billion annually.⁹ By contrast, the expenditure required to fully regulate Children's Contact Services (CCS) represents only a fraction of this amount. High-cost implementation therefore represents a fiscally responsible strategy that shifts spending from crisis response to prevention, delivering higher returns for government and society.

A comprehensive accreditation scheme also provides the foundation for professionalising the CCS workforce. Mandatory qualifications, ongoing professional development, and clear career pathways strengthen service quality and enhance staff retention. This professionalisation is essential to stabilising the sector, ensuring CCS can meet increasing demand while maintaining consistent standards of safety and care. International evaluations highlight that investment in workforce development generates long-term efficiencies, including fewer critical incidents, reduced staff burnout, and stronger organisational capacity.¹⁰ In this sense, high-cost implementation is not only about protecting children in the present but also about building a sustainable, skilled, and resilient sector for the future.

Effective implementation of high intervention accreditation will require a staged and well-supported approach. Transitional assistance for smaller and regional providers is critical to ensure

equity of access and to prevent disruption to service availability. Dedicated Commonwealth funding must underpin the reform, guaranteeing that no child is excluded due to cost or geography. Transparent monitoring, comprehensive data collection, and regular public reporting will reinforce accountability and allow for continuous improvement.

The long-term vision is clear: a nationally consistent, professional, and trusted CCS system that upholds the rights and safety of every child. High-cost implementation is the only pathway capable of delivering this vision ensuring that all children, regardless of circumstance, are protected by the same high standards of safety, care, and accountability.

References

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- ⁵ Australian Institute of Health and Welfare. (2021). Child protection Australia 2019–20. AIHW. <https://www.aihw.gov.au/reports/child-protection/child-protection-australia-2019-20>
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- ⁷ Australian Law Reform Commission. (2019). Family Law for the Future: An Inquiry into the Family Law System (ALRC Report 135). ALRC. <https://www.alrc.gov.au/publication/family-law-report-135/>
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