Aboriginal Community Controlled
Culturally Safe
Prevention of Family Violence
Legal Services and Holistic Support
Cultural and Wellbeing Workshops
Policy and Advocacy

Djirra
Sharing stories, finding solutions

Djirra's submission to the 2026 Review of the National Agreement on Closing the Gap

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Djirra welcomes the opportunity to provide this submission to the Productivity Commission's review of the National Agreement on Closing the Gap (the Review). In this submission, we reiterate Djirra's longstanding concerns about the lack of progress against the socio-economic targets (Targets), particularly Targets 10-13, as Aboriginal women continue to experience disproportionately high rates of family violence, child removal and incarceration. Addressing these significant and ongoing harms requires urgent and sustained investment in proven Aboriginal women-led solutions. Such investment is critical to accelerating progress against the national Targets and closing the gap for Aboriginal women and their children.

Djirra is an Aboriginal Community Controlled Organisation (ACCO) with over 20 years' experience accompanying Aboriginal and Torres Strait Islander women, and their children, on their individual journeys.[1] We find solutions through Aboriginal and Torres Strait Islander women sharing their stories, journeys, and experiences. Djirra celebrates women's strength and resilience. We are committed to a future without family violence.

We deliver holistic, culturally safe, specialist family violence support, legal services and case management, alongside cultural and wellbeing workshops and programs. Our services have state-wide reach, touching every part of Victoria to meet the needs of Aboriginal and Torres Strait Islander women. Self-determination is the foundation of everything we do.

Djirra amplifies the voices of Aboriginal and Torres Strait Islander women. We advocate for system-wide change to improve access to justice, eliminate systemic violence, and strengthen women's resilience.

We are an active member of First Nations Advocates Against Family Violence (FNAAFV), the national peak body for specialist Family Violence Prevention and Legal Services (FVPLSs). We refer to FNAAFV's submission to inform the Review.

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[1] Notes on language: Djirra uses the term 'Aboriginal' to refer to Aboriginal and Torres Strait Islander peoples living in Australia. Djirra provides services to Aboriginal women and their children, including sistergirls, brotherboys, trans and gender diverse people, non-binary, intersex and queer folk who identify as women or who feel comfortable accessing a women's service. The term 'family violence' is used to encompass sexual violence, intimate partner violence and domestic violence, consistent with section 5 of the *Family Violence Protection Act 2008* (Vic).

Six years after the National Agreement was signed, progress remains limited. Of the 17 national Targets, only three are currently on track.[2] Targets 10-13 are of particular concern, with Targets 10 and 12 assessed as worsening, Target 11 showing no change from the baseline, and insufficient data available to assess progress against Target 13.[3] This reflects a continuing failure to address the structural drivers of family violence, child removal and incarceration that disproportionately affect Aboriginal women and children.

Djirra understands that this Review will focus on prevention by examining outcomes affecting children and young people. Family violence must be a central focus of the Review, given its role as both a key driver and consequence of the removal of Aboriginal children and the incarceration of Aboriginal women and young people. Equally, ensuring the safety and wellbeing of Aboriginal women is critical to improving outcomes for children. Over more than two decades, Djirra has seen that when Aboriginal women are safe, children are safer and outcomes improve. Interconnected action on these issues is critical to achieving Targets 10-13.

The concerns and solutions outlined in this submission are not new. Djirra has consistently advocated for them over many years. Despite repeated government commitments and clear evidence of what works, governments have not delivered the sustained investment and structural reform required to improve outcomes for Aboriginal women and their children. The Review presents an important opportunity to translate commitments into action through practical, Aboriginal-led solutions that address entrenched inequality and accelerate progress towards closing the gap.

Recommendations

Achieving Targets 10-13 and embedding all Priority Reforms requires urgent action to strengthen the safety and wellbeing of Aboriginal women and their children. Djirra urges the Productivity Commission to recommend that governments:

1. Establish Djirra's Aboriginal Women's Centre as an essential, permanent, culturally strong infrastructure for frontline services, where Aboriginal women and children can access safety, justice and healing.
2. Expand Djirra's specialist legal and non-legal services across metro, regional and rural Victoria, to ensure no Aboriginal woman has to travel more than 100 kilometres or one hour to access culturally safe support for her safety and the safety of her children.
3. Support nationally consistent referral pathways, including Child Protection Notification and Referral Systems, alongside dedicated investment, to ensure Aboriginal women can access specialist, culturally safe legal and non-legal assistance from FVPLSs as soon as child protection becomes involved.

[2] Productivity Commission. (2026). *Dashboard - Closing the Gap.*
[3] Productivity Commission. (2026). *Dashboard - Closing the Gap.*

4. Invest in Aboriginal-led legal and non-legal services, including Djirra's Prison Support Program, for Aboriginal women in contact with the justice system who have experienced family violence, including women who have been misidentified.
5. Invest in proven Aboriginal-led early intervention and prevention programs for Aboriginal women who have experienced, or are at risk of, family violence, including Djirra's Young Luv®, Sisters Day Out®, Dilly Bag and Koori Women's Place.
6. Invest in, and mandate, ongoing Aboriginal-led, cultural safety training and accountability mechanisms across all government organisations, including police, courts, child protection, family violence and corrections systems, to address racial and gendered bias, discrimination, violence and institutional failures.
7. Implement self-determined, flexible funding models that enable FVPLSs to respond to community needs and meet rising service demand, and enable organisational sustainability by covering core operational costs, inflation and award increases.
8. Improve communication, transparency and accountability mechanisms between governance bodies and ACCOs, and ensure partnerships embed genuine, shared decision-making alongside appropriate resourcing for ACCO participation.
9. Commit dedicated, ongoing funding for specialist FVPLSs to collect, govern and analyse our own data in accordance with Indigenous data sovereignty, and use this evidence to demonstrate impact, identify unmet need, inform funding priorities, and measure progress against Targets 10-13.
10. Take urgent action to address the lack of accurate, current and regularly updated data relating to Target 13, and ensure data is publicly available and transparently reported.

Recommendations in detail

Government investment in proven Aboriginal-led solutions is critical to achieving Targets 10-13, yet Aboriginal-led responses remain significantly underfunded.

While structural reform remains essential, Aboriginal women cannot wait for governments to address the systemic racism and discrimination embedded across mainstream systems. Aboriginal women must have access to culturally safe, Aboriginal-led legal and non-legal supports now to navigate complex systems, recover from family violence, and remain safe, connected to culture and free from further criminalisation and injustice. Djirra provides these supports.

To ensure all Aboriginal women can access lifesaving support, and to strengthen the community-controlled sector in line with Priority Reform 2, governments must invest in proven Aboriginal-led solutions. Djirra's holistic service model delivers strong outcomes for Aboriginal women while reducing costs to government.

The recommendations outlined in this submission are informed by Djirra's frontline experience working alongside Aboriginal women for more than 24 years. Together, they provide a suite of

practical, evidence-based solutions that would strengthen Aboriginal women's safety, support implementation of the Priority Reforms and accelerate progress towards Targets 10-13.

Recommendation 1: Establish Djirra's Aboriginal Women's Centre

Recommendation: Establish Djirra's Aboriginal Women's Centre as an essential, permanent, culturally strong infrastructure for frontline services, where Aboriginal women and children can access safety, justice and healing.

Dedicated physical infrastructure for Aboriginal women is essential to progressing Targets 10-13, because purpose-built, culturally safe spaces improve access to holistic, wraparound services and support better outcomes for Aboriginal women and their children.

Djirra's vision for an Aboriginal Women's Centre is backed by Yoorrook Recommendation 80b[4] and best practice evidence gathered through a Churchill Fellowship undertaken by Djirra's CEO.[5] Djirra's Aboriginal Women's Centre will expand and strengthen our established integrated service model, enabling Aboriginal women to access family violence case management, legal services, healing and cultural programs, and early intervention and prevention initiatives in a single location. Having a purpose-built centre will expand our capacity to take on a greater proportion of service delivery.

Djirra's Aboriginal Women's Centre will connect women with services beyond Djirra's direct offerings, including social enterprise development and initiatives that strengthen economic security. Building economic independence is an important prevention strategy to address significant financial barriers that can prevent Aboriginal women from leaving violent relationships.[6]

Investment in this critical infrastructure will create a permanent, purpose-built home for frontline services supporting Aboriginal women, strengthen the community-controlled sector in line with Priority Reform 2, and contribute to progress against Targets 10-13.

Recommendation 2: Invest in Djirra's Regional Expansion

Recommendation: Expand Djirra's specialist legal and non-legal services across metro, regional and rural Victoria, to ensure no Aboriginal woman has to travel more than 100 kilometres or one hour to access culturally safe support for her safety and the safety of her children.

Ensuring Aboriginal women can access culturally safe support regardless of where they live is critical to achieving Closing the Gap Targets. Djirra's vision is that no Aboriginal woman should have

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[4] Yoorrook Justice Commission. (2023). *Yoorrook for Transformation: Summary Report*. (Recommendation 80b, p. 76).
[5] Antoinette Braybrook AM. (2023). *Churchill Fellowship to study organisations to inform the establishment of a business model for Djirra's expansion*.
[6] Change the Record. (2021). *Pathways for Safety: The case for a dedicated First Nations Women's National Safety Plan - written by Aboriginal and Torres Strait Islander women, for Aboriginal and Torres Strait Islander women*; Our Watch. (2021). *Change the story: A shared framework for the primary prevention of violence against women in Australia (2nd ed.).*

to travel more than 100 kilometres or one hour to access culturally safe support for her safety and the safety of her children. This benchmark is achievable and should be regarded as the minimum standard, not the end goal. Over time, distances must continue to reduce, ensuring services become increasingly accessible to all Aboriginal women.

Aboriginal women in regional and rural Victoria consistently call for greater access to Djirra's services. Our recent expansion in Melton and Mildura demonstrates that when services designed by and for Aboriginal women are available, Aboriginal women use them. In 2023, Djirra opened Djirra in the West, a dedicated space where Aboriginal women can access our full range of legal and non-legal services and programs. Within its first year, client numbers in Melbourne's west increased fourteen-fold. More recently, in the first six months following the expansion of our services in Mildura in December 2025, Djirra supported 38 women with more than 300 hours of case management support and delivered 14 Koori Women's Place workshops.

Sustainable investment in Djirra's regional expansion will strengthen the community-controlled sector in line with Priority Reform 2, enabling us to reach more Aboriginal women and take on a greater proportion of service delivery. Expanding access to culturally safe support across metropolitan, regional and rural Victoria is essential to improving outcomes for Aboriginal women and accelerating progress against Targets 10-13.

Recommendation 3: Establish Child Protection Notification and Referral Systems

Recommendation: Support nationally consistent referral pathways, including Child Protection Notification and Referral Systems, alongside dedicated investment, to ensure Aboriginal women can access specialist, culturally safe legal and non-legal assistance from FVPLSs as soon as child protection becomes involved.

National progress against Target 12 is worsening, and Productivity Commission data shows Victoria has the highest rate of Aboriginal children in out of home care in the country.[7] To make tangible progress against this target, Djirra has long advocated for the establishment of a Child Protection Notification and Referral System (CPNRS). This self-determined solution prioritises keeping Aboriginal mothers and their children safe and together and is supported by Recommendation 12 of *Yoorrook for Justice*.[8] A CPNRS would ensure Aboriginal women are immediately referred to culturally safe legal representation, advice and non-legal wraparound support as soon as a child protection notification is made.

Aboriginal women experiencing family violence should not be expected to navigate complex child protection systems alone, yet many continue to enter these processes without culturally safe legal

[7] Productivity Commission (2026). *Socio-economic outcome area 12 - Aboriginal and Torres Strait Islander children are not overrepresented in the child protection system*.
[8] Yoorrook Justice Commission. (2023). *Yoorrook for Justice: Report into Victoria's child protection and criminal justice systems* (Recommendation 12, p.31).

representation, advocacy or support. Early access to legal assistance and holistic support can significantly alter the trajectory of child protection matters and help prevent child removal.

Preventing child removal also generates substantial cost savings for government. In 2025-26, Djirra supported 462 Aboriginal children to remain safely with their mothers. Based on Victorian Productivity Commission data, this equates to an estimated saving of $159,852 per day, or $58.3 million annually, in out-of-home care costs.[9]

While systems differ across jurisdictions, Closing the Gap should support nationally consistent referral pathways, such as CPNRSs, alongside dedicated investment to ensure Aboriginal women can access culturally safe legal and non-legal support at the earliest point of system contact. These reforms would contribute to progress against Targets 10-13 and support implementation of Priority Reform 3.

Recommendation 4: Prioritise initiatives to end incarceration and criminalisation of Aboriginal women

Recommendation: Invest in Aboriginal-led legal and non-legal services, including Djirra's Prison Support Program, for Aboriginal women in contact with the justice system who have experienced family violence, including women who have been misidentified.

Criminalising Aboriginal women does not create safety; it entrenches harm. To close the gap on Targets 10 and 11, governments must address key drivers of justice system contact, including punitive justice responses, misidentification, child protection involvement, poverty and family violence. The link between family violence and justice system contact is particularly stark, with national data showing that almost 90 per cent of Aboriginal women in custody have experienced family violence.[10]

Governments' reliance on punitive justice responses continues to disproportionately affect Aboriginal women. For example, in 2025, following the introduction of harsher bail laws in Victoria,[11] the number of Aboriginal women in custody doubled,[12] while demand for Djirra's Prison Support Program increased by 80 per cent.[13]

Justice systems continue to perpetuate systemic racism, with police disproportionately misidentifying Aboriginal women as the primary aggressor in family violence incidents, resulting in wrongful contact with the justice system. Djirra supports Aboriginal women to challenge and rectify misidentification, a process that is often lengthy and complex. Even where misidentification is

[9] Productivity Commission (2026). *Report on Government Services 2026 - 16 Child Protection (Table 16A.28 – Provision of out-of-home care Victoria)*.
[10] ANROWS. (2020). *Women's imprisonment and domestic, family and sexual violence: Research Synthesis*.
[11] Victorian Government (2025). *Bail Amendment Act 2025*.
[12] Corrections, Prisons & Parole. (2026). *Monthly time series prison and community corrections data*.
[13] As of August 2026.

rectified, Aboriginal women can experience significant and lasting consequences, including child protection involvement, loss of housing and employment, financial insecurity, and further trauma.

Governments must move away from punitive responses and towards programs and services that address the drivers of justice system contact and support Aboriginal women in custody who have experienced family violence. This includes sustainable investment in Aboriginal-led legal and non-legal services and early intervention and prevention programs.

Djirra's Prison Support Program is a proven Aboriginal women-led solution that provides legal and non-legal support to Aboriginal women in custody. It supports healing, strengthens connections to culture and community, assists women to safely transition back into the community, and helps prevent ongoing involvement with the criminal justice system. Over the last 12 months, only three per cent of Djirra's Prison Support Program participants have been reincarcerated.[14]

Djirra's Aboriginal-led, culturally safe programs also reduce costs to government. In 2025-26, Djirra supported 111 Aboriginal women to avoid imprisonment, delivering an estimated annual saving of $25.8 million in prison costs.[15] Investing in initiatives such as Djirra's Prison Support Program will contribute to progress against Targets 10-13.

Recommendation 5: Invest in proven Aboriginal-led early intervention and prevention programs

Recommendation: Invest in proven Aboriginal-led early intervention and prevention programs for Aboriginal women who have experienced, or are at risk of, family violence, including Djirra's Young Luv®, Sisters Day Out®, Dilly Bag and Koori Women's Place.

To achieve Targets 10-13 and support Priority Reform 2, governments must invest in Aboriginal-led early intervention and prevention initiatives. Despite longstanding evidence that prevention delivers better outcomes, governments continue to underfund these approaches. Djirra has developed a suite of successful programs for Aboriginal women that have been recognised internationally and identified as best practice by the Victorian Royal Commission into Family Violence.

Our programs are trusted, culturally strong and trauma-informed, providing safe pathways for Aboriginal women and girls to learn about family violence, recognise warning signs, strengthen cultural connection and access legal and non-legal support. Djirra's signature early intervention and prevention programs, Sisters Day Out®, Dilly Bag, Young Luv® and Koori Women's Place, draw on cultural strength to build resilience, confidence and self-worth, strengthen connection to culture, and increase awareness of family violence.

[14] As of September 2026.

[15] Productivity Commission (2026). *Report on Government Services 2026 – 8 Corrective services (Table 8A.19 – Total net operating expenditure and capital costs per prisoner in Victoria 2024-25)*.

Importantly, these programs act as critical gateways to safety, justice and ongoing support. Through participation, women build trusted relationships with Djirra's staff and services, increasing confidence to seek help when needed. These connections provide pathways to Djirra's legal assistance, family violence support and case management, as well as other local services. Investment in proven Aboriginal-led early intervention and prevention programs will strengthen Aboriginal women's safety and wellbeing, support earlier help-seeking, and contribute to progress against Targets 10-13.

Recommendation 6: Address systemic racism and embed cultural safety across government organisations

Recommendation: Invest in, and mandate, ongoing Aboriginal-led, cultural safety training and accountability mechanisms across all government organisations, including police, courts, child protection, family violence and corrections systems, to address racial and gendered bias, discrimination, violence and institutional failures.

Improving outcomes for Aboriginal women and advancing Priority Reform 3 requires both culturally safe responses from frontline workers and systemic reform to ensure institutions do not perpetuate the racism, discrimination and harmful practices that continue to undermine Aboriginal women's access to safety and justice.

Djirra delivers Aboriginal-led Cultural Learning Workshops for sectors that interact with Aboriginal women who have experienced family violence. These programs address racial and gendered bias and discrimination, strengthen the capacity and accountability of frontline workers, policy makers and institutions to respond to Aboriginal women in a safe and appropriate way, and build understanding of culture, colonisation and allyship.

Consistent with Recommendation 5 of *Yoorrook for Justice*,[16] governments must support and expand cultural safety initiatives through dedicated investment. They also must mandate ongoing Aboriginal-led cultural safety training and accountability mechanisms across frontline systems. This is critical to achieving Priority Reform 3 and improving outcomes for Aboriginal women and children.

Recommendation 7: Invest in FVPLSs and the Aboriginal family violence workforce

Recommendation: Implement self-determined, flexible funding models that enable FVPLSs to respond to community needs and meet rising service demand, and enable organisational sustainability by covering core operational costs, inflation and award increases.

[16] Yoorrook Justice Commission. (2023). *Yoorrook for Justice: Report into Victoria's child protection and criminal justice systems* (Recommendation 5, p.28).

Sufficient, sustainable investment in ACCOs and FVPLSs is urgently required to implement the Priority Reforms and achieve Closing the Gap outcomes. Building the community-controlled sector (Priority Reform 2) requires governments to invest in frontline Aboriginal-led organisations delivering legal, family violence and holistic support services to Aboriginal women and their children. Governments must also commit funding to Closing the Gap implementation plans rather than continuing a "cost-neutral" approach to reform.

Funding must reflect need, not geography - Djirra has consistently raised concerns that Commonwealth funding models do not adequately reflect family violence service demand in Victoria. Allocating funding primarily on the basis of remoteness or population thresholds is not equitable and fails to recognise the realities of family violence. Aboriginal women often relocate across regions and states to access safety, meaning service demand cannot be measured through geographic population thresholds alone.

Funding models should support statewide and flexible service delivery and enable FVPLSs and ACCOs to direct resources where they are most needed across metropolitan, regional and rural communities.

Fund the true cost of Aboriginal-led services - FVPLSs remain chronically under-resourced despite delivering critical services to Aboriginal women and children. Funding arrangements frequently fail to reflect the true cost of culturally safe service delivery, including workforce supervision and wellbeing, governance and organisational capability, cultural safety practices, infrastructure, and increasing reporting and evaluation requirements. Short-term and project-based funding undermines workforce stability, disrupts service delivery and erodes client trust.

Funding agreements should reflect inflation, award increases, pay parity, workforce growth and retention, rising service complexity and increasing demand. Governments must also provide funding that enables ACCOs to contribute policy, reform and legislative expertise drawn from frontline service delivery.

A self-determined approach to funding would enable ACCOs to direct resources where they are most needed in line with community priorities. Djirra also refers the Review to the broader funding recommendations outlined in FNAAFV's submission. Addressing these issues would strengthen reciprocity, trust and shared accountability between governments and ACCOs, while supporting self-determination and Priority Reform 1.

Investment in Aboriginal-led organisations is not only necessary to sustain service delivery, it also delivers significant social and economic returns. Based on calculations using Safe and Equal's analysis of the cost benefits of specialist family violence services, Djirra's work in 2025-26 would

have saved the Victorian Government approximately $23.8 million.[17] Governments must therefore increase investment in Aboriginal-led organisations, which deliver better outcomes for Aboriginal women and children while reducing long-term costs to government.

Recommendation 8: Strengthen Closing the Gap governance and accountability

Recommendation: Improve communication, transparency and accountability mechanisms between governance bodies and ACCOs, and ensure partnerships embed genuine, shared decision-making alongside appropriate resourcing for ACCO participation.

In Djirra's experience, the governance arrangements established under the National Agreement have not consistently delivered what is needed to effectively oversee implementation and drive progress against the Priority Reforms and socio-economic outcomes. This includes communication, transparency, accountability, shared decision-making and investment in ACCO participation. Djirra identifies the following governance and accountability issues as priorities for reform.

Communication and transparency - Clear communication and transparency are essential to effective governance and accountability. Djirra has found Closing the Gap communication channels to be complex and difficult to navigate, with information often flowing through multiple governance layers before reaching ACCOs. This can result in delays, inconsistencies and reduced access to timely information, limiting meaningful participation in Closing the Gap governance processes. Communication between governance bodies and ACCOs needs to be more consistent, transparent and accessible to ensure organisations are appropriately informed and able to contribute to implementation of the National Agreement.

Communication must also flow in both directions. Local experiences, priorities and emerging issues raised by ACCOs need to be more effectively communicated through Closing the Gap governance structures so that decision-making is informed by community experience. Stronger communication and transparency mechanisms would support the sharing of information, improve accountability between parties and strengthen formal partnerships and shared decision-making under Priority Reform 1.

Shared decision-making - Djirra's experience is that many existing formal partnerships do not reflect genuine shared decision-making or power-sharing. Governments frequently develop priorities, policy responses, funding approaches and solutions before engaging with ACCOs, resulting in consultation on government-led proposals rather than collaborative development of solutions. Consultation processes are often characterised by short timeframes, limited opportunities for meaningful input, and a perception that key decisions have already been made.

[17] Equity Economics for Safe and Equal. (2025). *The Costs and Benefits of Fully Meeting Demand for Specialist Family Violence Services in Victoria*.

Djirra participates in numerous partnerships and advisory processes with governments. In our experience, governments often act in ways that are reactive to external pressures rather than driven by ACCO-led priorities and solutions. We see this in the continued prioritisation of punitive responses and crisis interventions despite longstanding advocacy from ACCOs for greater investment in early intervention, prevention and Aboriginal-led solutions.

This approach undermines Priority Reform 1 and limits the ability of partnerships to support self-determination. Genuine shared decision-making requires governments to work with ACCOs from the outset to identify priorities, design solutions and determine investment approaches. ACCO priorities and expertise should be visibly reflected in policy, funding and implementation decisions.

Accountability - Government agencies must be held accountable for meeting their obligations under the National Agreement and progressing the Priority Reforms and socio-economic outcomes. Accountability requires more than commitments and implementation plans. Governments must be able to demonstrate how they are embedding the National Agreement into policy, funding decisions, service delivery and organisational practice.

Djirra is concerned that existing accountability mechanisms have not been sufficient to hold governments accountable for systemic, policy and program failures under the National Agreement. ACCOs need greater visibility of decision-making processes and outcomes, including a clear understanding of how decisions are made and how Aboriginal community priorities have informed them.

The role of local governments under the National Agreement also remains unclear. As signatories through the Australian Local Government Association,[18] local governments should demonstrate how they are partnering with ACCOs and contributing to Closing the Gap outcomes in their communities. Strengthening accountability across all levels of government would support genuine partnership, improve implementation of the National Agreement and accelerate progress towards the socio-economic outcomes.

Resourcing ACCO participation in governance - Effective governance requires ACCOs to be adequately resourced to participate in Closing the Gap governance, policy development and decision-making. Governments rely on ACCOs for expertise, cultural knowledge and community connections, yet this work is rarely funded at a level that reflects its complexity and importance. This places additional pressure on organisations already delivering frontline services and responding to growing community need.

FNAAFV, as the national peak body for specialist FVPLSs and Djirra's representative within the Coalition of Peaks, must be sustainably funded to undertake policy, advocacy and governance functions. More broadly, ACCOs should be funded not only to deliver services, but also to

[18] Closing the Gap. (2019). *Partnership Agreement on Closing the Gap 2019-2029.*

participate in consultations, advisory groups, partnership structures and Closing the Gap governance processes.

Adequately resourcing ACCO participation would strengthen reciprocity, trust and shared accountability between governments and ACCOs, while supporting self-determination and advancing Priority Reform 1.

Recommendation 9: Fund FVPLSs to collect, govern and analyse their own data

Recommendation: Commit dedicated, ongoing funding for specialist FVPLSs to collect, govern and analyse their own data in accordance with Indigenous data sovereignty, and use this evidence to demonstrate impact, identify unmet need, inform funding priorities, and measure progress against Targets 10-13.

To achieve Targets 10–13 and progress Priority Reform 4 (Shared Access to Data and Information), governments must commit to Indigenous Data Sovereignty principles and provide dedicated, ongoing funding for ACCOs and specialist FVPLSs to collect, govern and analyse their own data. This is essential to demonstrating impact, identifying unmet need, informing funding priorities and measuring progress against Closing the Gap outcomes.

Specialist FVPLSs are uniquely positioned to collect, interpret and use data relating to Aboriginal women and children experiencing family violence. We do this in ways that are culturally safe, community-led and responsive to local priorities. This provides a more accurate picture of Aboriginal women's experiences than many of the deficit-focused measures currently relied upon to monitor progress against Target 13. However, FVPLSs are limited by underinvestment in our data and evaluation capability.

Sufficient funding for FVPLS data and evaluation capability would assist governments to progress their commitment to Priority Reform 4 and monitor the implementation of Closing the Gap. It would also contribute to a stronger Aboriginal-led evidence base to inform policy development, service design and government decision-making.

Recommendation 10: Urgently address the lack of data on Target 13

Recommendation: Take urgent action to address the lack of accurate, current and regularly updated data relating to Target 13, and ensure data is publicly available and transparently reported.

To date, governments have made little progress to achieve Priority Reform 4, and data relevant to Aboriginal people is often unavailable and inaccessible to ACCOs.[19] A key example of this is the lack of up-to-date data related to Target 13 at the national level. This is a longstanding concern

[19] Productivity Commission. (2024). *Review of the National Agreement on Closing the Gap: Study Report, Volume 1*.

repeatedly raised by Djirra, FNAAFV and other ACCOs.[20] Closing the Gap continues to rely on 2018-19 National Aboriginal and Torres Strait Islander Health Survey (NATSIHS) data to report on family violence. Although updated NATSIHS data was released in 2024, it did not include the indicator used to measure progress against Target 13 ("Experiences of harm").[21]

It is unacceptable that national progress against Target 13 currently cannot be assessed due to the absence of up-to-date data. Governments must take urgent action to ensure family violence data relating to Aboriginal women is collected, updated and publicly reported on a regular basis. Without current data, there is no meaningful way to measure progress, identify areas requiring attention or hold governments accountable for outcomes under the National Agreement.

Conclusion

Aboriginal women continue to experience unacceptable rates of family violence, child removal, criminalisation and incarceration. If governments are to embed the Priority Reforms and work toward achieving Closing the Gap Targets, they must invest in Aboriginal-led solutions.

The most effective solutions are those that Aboriginal women have already identified: solutions that are culturally strong, evidence-based and proven to work. Governments must immediately invest in Aboriginal women's self-determined solutions, including Djirra's Aboriginal Women's Centre, and ensure sustainable funding for specialist FVPLSs to provide legal and non-legal support and cultural programs for Aboriginal women and children experiencing violence.

Thank you for the opportunity to contribute to this Review of the National Agreement on Closing the Gap. Should you have any questions or wish to discuss the matters raised above further, please do not hesitate to contact our office at ceo@djirra.org.au.

Yours sincerely,

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Chief Executive Officer

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[20] Djirra. (2023). *Productivity Commission Review of the National Agreement on Closing the Gap Draft Report*; Djirra. (2024). *Response to Australian Institute of Criminology Statistical Bulletin*.
[21] Australian Bureau of Statistics. (2024). *National Aboriginal and Torres Strait Islander Health Survey: 2022-23 financial year (data item list)*; Australian Bureau of Statistics. (2019). *National Aboriginal and Torres Strait Islander Health Survey: 2018-19 financial year (data item list)*.