



Parkerville CYC Response to the Treasury Laws Amendment (Victims of Crime) Bill 2026

Our holistic support to children, young people, and families

Parkerville Children and Youth Care is a For Purpose organisation that supports children, young people, and their families to build skills and capacity, address the impacts of trauma and adverse childhood experiences, and develop capabilities that will enable them to be the best versions of themselves.

We see a future where Western Australia is the safest place in the world and all children, young people, and their families feel safe to dream, to thrive, and to reach their fullest potential.

We have been working alongside vulnerable children, young people, and their families for over 120 years, and every year, we support more than 13,000 people across WA through our therapeutic, out-of-home care, and early intervention and prevention services. The future of those we serve depends on what we do in the present to support them to reach their potential.

Our Purpose

Our purpose as an organisation is to support children, young people, and their families to build skills and capacity, address the impacts of trauma and adverse childhood experiences, and develop capabilities that will enable them to be the best versions of themselves.

Our Vision

We see a future where Western Australia is the safest place in the world and all children, young people, and their families feel safe to dream, to thrive, and to reach their fullest potential.

Our Values

As a strong, values-based organisation, we are dedicated to an ongoing journey of self-awareness, learning and improvement in everything we do because the children and young people with whom we work deserve nothing less.



Bold and courageous: We stand up for what is right and amplify the voices of the children, young people, families, and communities we support.



Curious and humble: We search out information and data that will help us remain at the forefront of all that we do.



Caring and respectful: We acknowledge and embrace the diversity and individuality of everyone we meet and those we serve.



Hopeful: We believe in the power of positivity and are optimistic about change, having faith that together we can overcome any challenge we may face.



Truthful and accountable: We are committed to being open, honest, and taking responsibility for our actions.



Parkerville CYC's services

Therapeutic Services

- **Multi-agency Investigation and Support Team (MIST):** co-located, multi-disciplinary, trauma-informed model to reduce harmful impacts of trauma from abuse. It is WA's first truly integrated child sexual abuse (CSA) response, with Child Advocacy Centres in Armadale (2011), Midland (2019), and Rockingham (2024). MIST's core principle is to reduce instances of children having to tell and re-tell their story, and coordinate services (including Police) to wrap around the child and family, through collaboration and knowledge-sharing.
- **Therapeutic Services:**
 - CSATS:** We provide a Child Sexual Abuse Therapeutic Service (CSATS) in a regional area of WA.
 - PACTS:** We also provide a Parents and Children's Therapeutic Service (PACTS) in a northern Perth suburb. 84% of children and young people receiving a service had experienced child sexual abuse.

Out of Home Care

- Parkerville CYC have had children in our care for the entirety of our 122-year history. We are implementing an innovative, award-winning new model, Our Way Home: radically personalised shared care, that focuses on the needs and desires of each child, and deliberately seeking to establish, maintain and deepen connections between children and their families. We care for children through a mixed provision across family group homes, foster care, and temporary care homes.

Early Intervention, Prevention and Youth Services

- **Child and Parent Centres (CPCs):** Parkerville runs two CPCs in Perth, servicing 12 primary schools in vulnerable communities. The centres work to create an entry point into the school system and help with school readiness, but importantly they focus on increasing family capacity and help them provide appropriate developmental experiences.
- **Kids' Hub:** multi-disciplinary approach to providing comprehensive mental health/wellbeing services for children aged 0-12 years, targeting mild to moderate emerging complexity. This service is a collaboration with Koya Aboriginal Corporation, Pregnancy to Parenthood, Lifespan Psychology Services, and MIFWA.
- **Family Support Network:** an early intervention program that connects families with coordinated services to strengthen child safety and prevent entry into out-of-home care.
- **Intensive Family Support Service:** in partnership with Koya Aboriginal Corporation, this service will provide practical, in-home support to families who are engaged with the Department of Communities (Child Protection), where children are either at significant risk of entering out-of-home care or are working towards reunification with their families.
- **Education Employment and Training Program (EET):** For young people at extreme educational risk due to trauma, mental health, family issues.
- **Support and Community Services (SACS):** For families with children aged 4-14 that are experiencing homelessness, or at risk of homelessness and living in supported accommodation.
- **Moving Out, Moving On (MOMO):** service for young people aged 15-21 who are experiencing homelessness, or at significant risk of homelessness or transience.
- **Reconnect:** a diversion and early intervention service for families with young people (12-18) at risk of homelessness or family breakdown.
- **Young Women's Program:** medium-term accommodation and support for young women (including those with children) aged 16-25 experiencing or at risk of homelessness, or who need help to live independently.
- **Ruby's Reunification Program:** seeks to prevent youth homelessness through part-time accommodation, whilst engaging and supporting the family with counselling and practical support. It aims to foster hope for staying together or reunification, and keep young people out of the youth (and ultimately adult) homelessness sector.



Introduction

Parkerville Children and Youth Care (Parkerville CYC) welcomes the opportunity to comment on the *Treasury Laws Amendment (Victims of Crime) Bill 2026* and the accompanying *Exposure Draft Explanatory Materials*. We commend the Government for progressing reform to address the long-standing ability of perpetrators of child sexual abuse (CSA) to avoid compensation obligations by sheltering assets within the superannuation system, and for strengthening pathways to accountability and financial redress.

This submission builds on Parkerville CYC's earlier consultation response and draws on practice-based insights from working with children, young people and families impacted by CSA. It assesses both the strengths of the proposed legislative framework and its likely operation in practice, with a particular focus on accessibility, trauma-informed design, and the distinct needs of children and young people.

We support the intent of the Bill and welcome key measures that prevent misuse of superannuation, ensure that CSA compensation debts survive bankruptcy, and centralise the release process to reduce administrative burden on victim-survivors. We also highlight critical implementation, equity and child-safety considerations, and call for the scheme to embed trauma-informed, child-centred, and accessible practices to support those most affected by child sexual abuse to benefit from the proposed legislative changes.

1. Alignment with Issues Raised in Parkerville CYC's Original Submission

Our original consultation response emphasised that:

- Compensation plays both a symbolic and material role in victims' recovery.
- Many children and families experience multiple barriers in accessing compensation:
 - delayed disclosure
 - complexity and re-traumatisation from legal processes
 - low material and psychosocial resources
 - system navigation burdens
 - limited offender assets
- Offenders using superannuation to avoid paying compensation further entrenches injustice.
- Reform should prevent misuse of the superannuation system, while supporting a trauma-informed compensation pathway.

The draft Bill reflects progress on several of these concerns:

A. Addressing misuse of superannuation

- The provisions enabling victims to apply first for visibility of a perpetrator's superannuation contributions, and then for a perpetrator contributions release order, directly address the long-standing loophole allowing perpetrators to hide assets through superannuation contributions.

B. Recognising the role of compensation in survivors' healing

- The Explanatory Materials acknowledge the profound harm of CSA and the importance of giving victims meaningful avenues to enforce compensation orders. This aligns with our evidence that financial restitution is both practically essential and symbolically validating for survivors.

C. Ensuring that compensation debts survive bankruptcy

- We strongly support the amendment allowing CSA compensation debts to survive bankruptcy - this is essential to curbing tactics used by perpetrators to avoid accountability.

D. Centralised, ATO-led release process

- Locating the release authority process with the Commissioner of Taxation reduces the burden on victims and avoids requiring them to navigate multiple superannuation funds or interact with perpetrators who may control their own SMSFs. This reflects our recommendation to minimise re-traumatisation and system navigation barriers.

2. Remaining Considerations and Systemic Barriers

While we support the Bill's intent and direction, our practice insights highlight several ongoing barriers that the legislation does not fully address, and which may impact its practical accessibility for the children, young people and families that we support.

A. Burden on victims to initiate complex legal processes

The Bill requires victims to:

1. Apply to the Commissioner for information
2. Receive a disclosure
3. Prepare an application to the Federal Circuit and Family Court (Division 2)



4. Engage in adversarial proceedings where perpetrators may challenge the application.

For many children, young people and families, particularly those experiencing multiple disadvantage, this remains an extremely heavy burden. Although the ATO-led model is simpler than alternatives, the initial stages still require legal support, documentation, and emotional capacity to revisit traumatic experiences.

B. Risks of re-traumatisation

As we noted previously, engaging with legal systems and recounting CSA history can be profoundly distressing and destabilising. The draft law does not integrate trauma-informed safeguards such as:

- supported referral pathways
- access to financial counselling or legal assistance
- simplified evidentiary requirements
- minimising repetition of traumatic narrative

We urge government to consider parallel administrative supports or dedicated funding for victim-support organisations to assist with applications.

C. Eligibility constrained by requirement for existing compensation orders

The scheme is only accessible where:

- a conviction or finding of guilt exists, and
- a compensation order has already been made and unpaid for 12 or more months

This excludes:

- victims who do not disclose until adulthood
- cases that do not progress to prosecution
- situations where convictions are not secured despite credible allegations
- non-criminal justice pathways

Many victim/survivors of sexual abuse - especially those with complex trauma - are least likely to have secured compensation orders and thus will remain outside the scheme.

D. Interaction with family law, bankruptcy or proceeds of crime proceedings

Although the Bill appropriately avoids conflict between competing legal processes, these provisions may extend timeframes and add layers of complexity for victims. For many families that we support, long delays can intensify hardship and emotional strain.

E. Child-centred safeguards are essential

Children and young people warrant distinct consideration, as developmental factors, power imbalances with adults, and limited legal agency shape how they can engage with and navigate complex systems.



Child sexual abuse often occurs within relationships of trust or dependence, and many children face significant barriers to disclosure, help-seeking, or participating in formal processes. A compensation system designed for adults risks overlooking children's safety needs, communication needs, and the heightened risk that a non-safe parent or caregiver may be involved in the offending.

Accordingly, the legislative framework must explicitly require child-centred safeguards, streamlined processes, and supported pathways that ensure the system adapts to the needs and vulnerabilities of children, rather than expecting children and young people to adapt to adult-oriented processes.

3. Recommendations Moving Forward

Parkerville CYC supports the legislation and advocates for the implementation be accompanied by:

A. Trauma-informed access supports

- Commonwealth-funded legal assistance: Many children, young people and families lack access to advocacy or resources to navigate multi-stage processes. Dedicated, trauma-informed legal support should be funded to ensure that victim-survivors are not retraumatised or disadvantaged by complex evidentiary and procedural requirements.
- Integration with child advocacy and counselling services: Access to therapeutic support, case advocacy, and warm referral pathways is critical to reducing the emotional burden of disclosure and systems engagement. Aligning applications with existing child-centred service systems - such as multi-agency models, therapeutic services, and family support programs, ensures that victim-survivors are guided and emotionally supported throughout the process.
- Clear, developmentally appropriate guidance for victim-survivors and their families: Information about the scheme must be tailored for different literacy levels, languages, disability access needs, and age groups. Guidance should include step-by-step explanations, examples, and an outline of what children, young people and families can expect at each stage, including the timelines, decision points, and potential challenges.

B. Pathways for victim-survivors without existing compensation orders

Many victim-survivors, particularly those who disclose only in adulthood, or whose cases do not proceed through the criminal justice system, will not have an existing compensation order and therefore remain excluded from the scheme. This creates a significant equity gap, especially given the well-established barriers that prevent children and young people from disclosing abuse, securing convictions, or engaging in civil proceedings at the time harm occurs.

We recommend that Government explore complementary pathways such as:



- Administrative or civil-based access mechanisms for cases where credible allegations exist but have not resulted in criminal conviction or a compensation order.
- A streamlined, trauma-informed application process modelled on redress schemes, enabling victims to seek access to perpetrators' superannuation without re-entering adversarial legal processes.
- Options for retrospective or alternative evidence pathways, acknowledging that delayed disclosure, family violence, disability, cultural factors, and intersecting trauma frequently prevent children and young people from pursuing compensation orders in the first instance.

These pathways are vital to avoid entrenching inequity, ensuring that the victim-survivors who faced the greatest systemic obstacles are not again excluded from access to financial redress.

C. Monitoring and evaluation

We encourage Treasury and the ATO to work with victim-survivor organisations to:

- review scheme uptake
- understand barriers to access
- assess whether unintended consequences arise (such as re-traumatisation risks or inequities across socioeconomic lines)

D. Enhanced safeguards for children

To ensure that children and young people are not further harmed or placed at risk during compensation and superannuation-related processes, implementation must include robust, child-centred safeguards. This requires coordinated action across agencies responsible for children's safety and wellbeing, and recognition that many children affected by CSA have complex family, relational, and developmental contexts that require tailored protections.

- **Child-safe practice embedded across all victim-survivor-facing stages of the process:**
Every point of interaction, from the initial request for information to court processes and release of funds, must be designed to minimise risk, prevent re-traumatisation, and ensure that children's rights and voices are upheld. This includes ensuring that staff involved in these processes are trained in child-safe practice, understand trauma responses, and respond in ways that are culturally safe and developmentally appropriate.
- **Safeguards for children where family dynamics pose risks or complexities:**
Many cases of child sexual abuse involve intra-familial or trusted-adult perpetrators, or situations in which a non-offending parent may be unable to support or safeguard the child. The system must ensure that adults acting on the child's behalf are appropriate, safe, and genuinely able to advocate for the child's interests. Clear protocols should prevent perpetrators, or adults aligned with them, from obtaining information, influencing decisions, or obstructing access to the scheme.



- **Streamlined and supported processes for children with a parent or guardian implicated in the abuse:**

In cases where a child's primary caregiver is the alleged or convicted perpetrator - or where caregivers are otherwise conflicted - there must be alternative, proactive pathways for safe adults to act on the child's behalf. This may include authorised advocates, multi-disciplinary advocacy services, independent legal representatives, or court-appointed guardians, ensuring that children are not left without a mechanism to access compensation or navigate legal steps.

Conclusion

Parkerville CYC welcomes the draft legislation as a significant and necessary step in ensuring that victim-survivors of CSA have a meaningful avenue to access justice and enforce compensation orders. It reflects many of the concerns that we raised in our original submission, particularly around preventing perpetrators from exploiting the superannuation system.

However, legislative reform alone will not eliminate the profound barriers that victim-survivors face in disclosure, legal engagement, and healing. We urge the Government to complement this framework with practical, trauma-informed, child-centred supports and to maintain an ongoing dialogue with victim-survivor organisations to ensure that the scheme delivers on its promise.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Kim Brooklyn".

Kim Brooklyn

Chief Executive Officer

Contact details

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