



Australian Government
Attorney-General's Department

October 2025

Joint Committee of Public Accounts and Audit

**Inquiry into the procurement of mandated national
support and advocacy services for victims of child sexual
abuse**

Attorney-General's Department Submission

Contents

Joint Committee of Public Accounts and Audit	1
Inquiry into the procurement of mandated national support and advocacy services for victims of child sexual abuse	1
Attorney-General’s Department Submission	1
Introduction	3
<i>National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030</i>	3
ANAO Report on the conduct of procurements relating to two new child sexual abuse-related national services	4
Tender and procurement processes being utilised by the department to seek providers of the required services	4
National Action Plan Measure 21 – A national offending prevention service for people who are concerned about their own sexual thoughts or behaviours towards children or young people, or are concerned about another adult.....	4
National Action Plan Measure 10 – A national support service for non-offending family members of child sexual abuse perpetrators.....	5
National Action Plan Measure 7 – A national information and referral service for victims and survivors of child sexual abuse	6
Matters raised in the ANAO Report on the Conduct of Procurements Relating to Two New Child Sexual Abuse-related National Services (Auditor-General Report No. 44 of 2024-25)	7
Key Findings	7
Recommendations.....	8
Lessons learned by the department and current status in response to the ANAO Recommendations	8
Departmental position on the findings of the ANAO audit.....	8
Work underway to address the ANAO recommendations.....	9
Current Status in response to ANAO Report Recommendations	10

Introduction

The Attorney-General's department (the department) welcomes the Joint Committee of Public Accounts and Audit's (the Committee's) 'Inquiry into the procurement of mandated national support and advocacy services for victims of child sexual abuse' (the Inquiry).

The Inquiry's Terms of Reference seek to examine:

- The tender and procurement processes being utilised by the Attorney-General's department to seek providers of the required services.
- The lessons learned by the department in relation to these procurements and their current status.
- Matters raised in, or associated with, Auditor-General Report No. 44 of 2024–25: Conduct of Procurements Relating to Two New Child Sexual Abuse-related National Services.

The department understands that the Committee is also seeking information about procurements for a national child sexual abuse offending prevention service, and a national support service for non-offending family members of child sexual abuse perpetrators. The offending prevention service was a direct recommendation of the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission).

A commitment was made by the Australian Government to establish both services under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030* (the National Strategy). The Australian National Audit Office (ANAO) audited these services as part of its 2024-25 work program.

The department is currently undertaking a third procurement for a national information and referral service for victims and survivors of child sexual abuse, which was also a recommendation from the Royal Commission and agreed to under the National Strategy.

This submission provides an overview of these three national services and related procurement processes, the ANAO audit of the 'Conduct of Procurements Relating to Two New Child Sexual Abuse-Related National Services', and the department's response to the ANAO's findings and current status in response to the recommendations.

National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030

The National Strategy is a 10-year, whole-of-nation framework to establish a coordinated and consistent approach to preventing and better responding to child sexual abuse in all settings. The National Strategy was a key recommendation of the Royal Commission and aims to reduce the risk, extent and impact of child sexual abuse and related harms in Australia. While the Commonwealth Government provides national leadership and oversight, the effective delivery of the National Strategy relies on strong collaboration with state and territory governments.

The National Strategy was developed and continues to be informed by extensive consultation with government and non-government stakeholders. The National Office for Child Safety within the department leads oversight and implementation of the National Strategy.

Under the National Strategy, the department is progressing procurement processes to deliver three national services. These include:

- a national information and referral service to assist victims and survivors of child sexual abuse, practitioners and the general public to navigate the service system and access help and information
- a national support service for non-offending family members of child sexual abuse perpetrators, and
- a national support service for those who are worried about their own sexual thoughts and behaviours towards children or young people, or if they are concerned about another adult.

The department has engaged in comprehensive consultation and procurement processes to ensure these services will be delivered to the highest standards.

ANAO Report on the conduct of procurements relating to two new child sexual abuse-related national services

On 3 June 2024, the ANAO commenced an audit to assess whether the department's conduct of procurements relating to two new child sexual abuse-related national services employed open and effective competition and achieved value for money, consistent with the Commonwealth Procurement Rules.

The audit was conducted as a planned and standard part of the ANAO's 2024-25 work program. It focussed on the procurement processes related to two measures under the National Strategy's First National Action Plan (NAP):

1. NAP measure 10 – **a national support service for non-offending family members of child sexual abuse perpetrators**, and
2. NAP measure 21 – **a national offending prevention service for people who are concerned about their own sexual thoughts or behaviours towards children or young people, or are concerned about another adult**.

On 18 June 2025, the ANAO published [Auditor-General Report No. 44 of 2024-25: Conduct of Procurements Relating to Two New Child Sexual Abuse-related National Services report](#) (the ANAO Report). The ANAO made six recommendations to the department relating to the planning and evaluation of procurements, timeliness of the procurements, conflict of interest management, record keeping and reporting practices within this report. The ANAO also outlined additional opportunities for improvement. The department responded to the ANAO Report, accepting all six recommendations and opportunities for improvement. The department's response was published within the ANAO report on 18 June 2025.

The department is currently undertaking a third procurement for a national information and referral service for victims and survivors of child sexual abuse (NAP measure 7). The ANAO did not examine the procurement process for NAP measure 7. The ANAO report notes that a Request for Tender for NAP measure 7 had not been released at the time the performance audit commenced.

Tender and procurement processes being utilised by the department to seek providers of the required services

National Action Plan Measure 21 – A national offending prevention service for people who are concerned about their own sexual thoughts or behaviours towards children or young people, or are concerned about another adult

Background

The NAP measure 21 national service will protect children by intervening before an individual commits a first-time or subsequent child sexual abuse-related offence.

The Royal Commission recommended that the Government introduce this service (recommendation 6.2), building on the success and learnings of similar international services such as the UK's *Stop it Now!*

There is currently no ongoing national prevention service designed for people to receive help to not commit a child sexual abuse offence, or designed for people to receive advice if they are concerned that another adult is at risk of or is already offending. Existing providers are locally based and are often unable to provide anonymous assistance – something research consistently demonstrates is crucial to the success of child sexual abuse offending prevention services.

Prior to the procurement process for the NAP measure 21, and to inform the design and delivery of this new national service, the department engaged a provider to undertake broad public consultations, including workshops with law enforcement and engagement with advocacy groups, academics, and other relevant stakeholders. The NAP measure 21 service model was endorsed by states and territories in May 2023.

The NAP measure 21 service will provide a helpline, website, other contact methods (such as an online chat function) and self-help modules that people can use anonymously and without cost. Users will be able to contact the service if they are worried about their own sexual thoughts and behaviours towards children or young people, or if they are concerned about another adult. The former of these two groups is NAP measure 21's primary target audience, and the service will be equipped to provide advice and guidance on how people can learn to manage unwanted thoughts or feelings and stop problematic or harmful behaviour, before it starts. People will be able to self-refer to the service or may be referred by others (e.g. other services, psychologists, law enforcement).

Procurement Process

The Government allocated \$9.6 million from 2021-22 to 2024-25 to support establishment and delivery of the NAP measure 21 service. Some funding will be deferred to 2025-26 to support service establishment and delivery.

In compliance with the Commonwealth Procurement Rules, the department conducted a single-stage, open tender approach to market for NAP measure 21. The request for tender (RFT) was released in November 2023 and closed in February 2024. The RFT was open for three months due to the scale and scope of the procurement. The department received five tender applications for the NAP measure 21 and conducted a comprehensive consultation and extensive procurement process to determine which represented the best value for money.

The department has confirmed that the ANAO's recommendations did not prevent the department from proceeding with the procurements and on 29 July 2025 entered into a contract with the preferred tenderer for NAP measure 21, Jesuit Social Services.

On 21 August 2025, the Attorney-General announced the awarding of the NAP measure 21 contract, which was subsequently reported through AusTender on 28 August 2025 in line with the Commonwealth Procurement Rules.

The department is currently working with Jesuit Social Services to advance Phase 1 of service delivery and anticipates the launch of the service in the first half of 2026.

The department has procured an evaluation provider to support the design and evaluation of the NAP measure 21 service.

National Action Plan Measure 10 – A national support service for non-offending family members of child sexual abuse perpetrators

Background

The NAP measure 10 support service will provide national support and advocacy for non-offending family members and friends of child sexual abuse perpetrators (non-offending family members).

Whilst not a specific recommendation of the Royal Commission, this service supports recommendation 9.1, which intends to provide an integrated model of advocacy and support and counselling to children and adults who experienced childhood sexual abuse. Non-offending family members typically experience significant health, social and economic impacts associated with their friend or family member's child sexual abuse perpetration. There is currently no ongoing national service specifically for non-offending family members and, while localised or more generic services are available to this group (typically with a focus on non-offending partners), there are significant social and service barriers to access.

Prior to the procurement process for the NAP measure 10, and to inform the design and delivery of this new national service, the department engaged a provider to undertake broad public consultations, including workshops with law enforcement and interviews with service organisations and advocacy groups specialising in sexual assault and child sexual abuse, family violence, complex trauma, and service delivery to priority groups. The NAP measure 10 service model was endorsed by states and territories in May 2023.

The NAP measure 10 service will provide support and advocacy for non-offending family members during and following crisis, primarily through a helpline and website (including online peer support forum). It will also

work with law enforcement to enhance police engagement with family members, for example at the point of a perpetrator's warrant or arrest.

Procurement Process

The Government allocated \$10.2 million from 2021-22 to 2024-25 to support establishment and delivery of the NAP measure 10 service. Some funding will be deferred to 2025-26 to support Service establishment and delivery.

In compliance with the Commonwealth Procurement Rules the department conducted a single-stage, open tender approach to market for NAP measure 10. The RFT was released in November 2023 and closed in February 2024. The RFT was open for three months due to the scale and scope of the procurement. The department received six tender applications for NAP measure 10 and conducted a comprehensive consultation and extensive procurement process to determine which represented the best value for money.

Whilst the ANAO identified non-compliances in tender responses received, it is the department's view that the procurement process for this service remains valid. The department continues to progress contract negotiations with the preferred supplier.

Contract negotiations have been prolonged due to several complex matters raised through the negotiation process, which have required the department to seek probity, technical and legal advice.

To respect the integrity and probity of the NAP 10 procurement process, the department is unable to provide further comment. Subject to contract finalisation, the department anticipates the launch of the service in 2026.

The department has procured an evaluation provider to support the design and evaluation of the NAP measure 10 service.

National Action Plan Measure 7 – A national information and referral service for victims and survivors of child sexual abuse

Background

The NAP measure 7 national information and referral service (NAP measure 7 service) will assist victims and survivors of child sexual abuse, practitioners and the general public to navigate the service system and access help and information.

The Royal Commission recommended the Government establish a national website and helpline to assist victims and survivors of child sexual abuse to access help and information (Recommendation 9.5).

The Royal Commission found that victims and survivors of child sexual abuse face barriers to seeking help, including concerns of privacy and confidentiality, feeling overwhelmed and frustrated by the lack of easily available and accessible information about appropriate services, and the limited availability of affordable therapeutic services.

Prior to the procurement process for the NAP measure 7 service, as a foundational measure under the National Strategy, from 2022-2023 the department undertook a baseline analysis of specialist and community support services responding to child sexual abuse to better understand the complex service sector landscape in Australia (NAP measure 24).

The department also undertook a broad public consultation process, finalised in early 2024, to shape the design of the service model and ensure it would meet the needs of users.

The analysis and consultation informed the NAP measure 7 service model, which was endorsed by states and territories in May 2024 to include a national website, helpline and specialist service navigators. While it will not provide therapeutic services, the NAP measure 7 service model will fill a critical gap in the existing service system by providing information and service navigation assistance to victims and survivors of child sexual abuse and others seeking help and information.

Procurement Process

The Government allocated \$8.7 million from 2021-22 to 2024-25 to support establishment and delivery of the NAP measure 7 service. Some funding will be deferred to 2025-26 to support Service establishment.

The procurement for the NAP measure 7 service is progressing in two stages; an initial, open Expression of Interest (EOI) stage followed by a RFT stage.

On 14 October 2024, the department released an open EOI on AusTender for a service provider to deliver the NAP measure 7 service. The EOI was open for a period of almost six weeks and closed on 22 November 2024. Following a comprehensive evaluation process by an Evaluation Committee, the Spending Delegate agreed a shortlist of EOI Respondents to progress to the RFT stage of the procurement.

On 16 July 2025, the RFT was released on AusTender to the shortlisted EOI Respondents. The RFT closed on 1 September 2025, and the evaluation process for the second stage of the procurement is now underway.

The RFT stage of the NAP measure 7 procurement has incorporated the findings and recommendations from the ANAO Report. The department is working closely with multiple advisers, including probity and legal advisers, to ensure the procurement process is fair, effective and consistent with all relevant Commonwealth Procurement Rules and guidelines.

Subject to the outcomes of the RFT stage, the department expects to enter into a Contract with a supplier in the first half of 2026, with the service to commence by the end of 2026.

Matters raised in the ANAO Report on the Conduct of Procurements Relating to Two New Child Sexual Abuse-related National Services (Auditor-General Report No. 44 of 2024-25)

Auditing of procurements is a business-as-usual function of the ANAO. The audit into the procurements relating to NAP measure 10 and NAP measure 21 were conducted as a planned and standard part of the ANAO's 2024-25 work program. The objective of the audit was to assess whether the department's conduct of the procurements employed open and effective competition and achieved value for money, consistent with the Commonwealth Procurement Rules.

The procurements were allocated funding in 2021-22 with the services anticipated to commence in 2023-24. At the time that the ANAO Report was published, contracts had not been signed for either service (the contract for NAP 21 has since been signed). These delays were an important consideration of the ANAO report.

The ANAO report provided key messages related to procurement and probity for all Government entities to consider, including:

- Ensuring that departments undertake robust and ethical procurement planning, objective and fair evaluation and proper recordkeeping.
- While the use of probity advisors is beneficial, ultimate responsibility and accountability for ethical procurement remains with the department.

The specific ANAO report findings and recommendations are provided below.

Key Findings

The ANAO report contained four key findings:

1. The new child sexual abuse-related national services identified as needed by the Royal Commission are not being provided, with no contracts in place for the delivery of those services.

2. The procurements did not involve open and effective competition and did not demonstrate the achievement of value for money.
3. The conduct of the RFT processes was not timely, non-compliant tenders were accepted for evaluation and ethical requirements were not met.
4. Tender evaluation was not well planned, was not timely and did not demonstrably achieve value for money.

Recommendations

The ANAO made six recommendations for action to address the four key findings. These are:

1. When conducting procurements, the department clearly identify the relative importance of each of the criteria to be applied in the evaluation process. This should include appropriate weighting of the price criterion in circumstances where a budget has been established for the goods and/or services being procured.
2. When planning procurements, the department:
 - a. ensures that potential suppliers are required to provide all the information that is relevant for the purposes of evaluation, and not ask for any information that is not required;
 - b. where data that is required for evaluation is not provided by a tenderer, this should be reflected in the tender either being excluded or a lower score against the relevant criterion (where the missing information relates to the evaluation criteria); and
 - c. where data that is required for evaluation has been provided, the department should have a plan to evaluate this information, and it should be evaluated in full by the department.
3. The department improve its procurement framework to address the conduct of additional processes, including collaboration activities to ensure they are conducted in a fair and transparent manner.
4. The department strengthen its adherence to recognised principles and processes for conducting procurements ethically, including the identification and effective management of conflicts of interest.
5. When developing evaluation plans, the department ensure that the planned evaluation addresses all information tenderers are required to include in submissions.
6. The department improve its procurement record keeping so that accurate and concise information exists on the process that was followed, how value for money was considered and achieved, and relevant decisions and basis of those decisions.

The ANAO report also outlined several 'Opportunities for Improvement', in addition to the six formal recommendations, focused on working-level improvements.

While NAP measure 7 was not subject to the audit, the ANAO Report noted that the department considered the approach to procuring service providers for the NAP 7, 10 and 21 services in the same procurement strategy. The Report also noted that the department conducted a new procurement process to engage Maddocks as the probity advisor for the NAP measure 7 procurement.

Lessons learned by the department and current status in response to the ANAO Recommendations

Departmental position on the findings of the ANAO audit

The procurement processes audited by the ANAO were complex in nature, and the anticipated timeframes taken during the development of the National Strategy were ambitious and indicative.

While all efforts were made to ensure correct processes were followed and ethical requirements were met during the procurement processes relating to NAP measure 10 and NAP measure 21, for anticipated service commencement in 2023-24, the department acknowledges that aspects of the procurements did not meet the required standard. However, the providers identified within these procurements to deliver NAP measure 10 and NAP measure 21 are considered valid by the department.

The department accepts all six of the ANAO's recommendations made as a result of the audit, as well as the additional opportunities for improvement, and is currently developing internal guidance to further support staff in planning and evaluating procurements.

Work underway to address the ANAO recommendations

On 7 April 2025, the Secretary approved an implementation workplan to address the recommendations and opportunities for improvement identified by the ANAO. This work is being led by the department's procurement team. The department has:

- evaluated current departmental guidance relating to the procurement processes identified
- consulted with the Australian Government Solicitor and other Commonwealth agencies, including the Department of Finance, to identify better practice approaches, and
- developed and issued a suite of new better practice templates and guidance materials to staff.

Implementation includes updates through internal all-staff communications channels and other forums to raise awareness of the report and the planned actions to address areas for improvement.

The department has substantially completed work on addressing the recommendations made by the ANAO in the form of updated procurement guidance material which was made available to the department on 3 October 2025. Further work will continue to ensure that the lessons learned are embedded into procurement practices.

Current status

Further details on work the department has taken to date, as well as planned action in response to the ANAO's recommendations, is provided at **Appendix A**.

Current Status in response to ANAO Report Recommendations

As at 16 October 2025

No.	Recommendation	Actions and timing
1	<p>When conducting procurements, the Attorney-General’s Department clearly identify the relative importance of each of the criteria to be applied in the evaluation process. This should include appropriate weighting of the price criterion in circumstances where a budget has been established for the goods and/or services being procured.</p>	<p><u>Action taken to date</u></p> <p>Following the release of the ANAO Report the department’s Chief Operating Officer emailed all staff to advise them of the report and the key messages. Staff were referred to the Australian Public Service Academy’s Commonwealth Procurement and Contract Management Training Suite and the department’s internal training material. The training offered by the Academy includes ‘procurement basics’, ‘probity and integrity in procurement’, ‘procurement for SES delegates’, ‘writing and evaluating tender criteria’ and ‘achieving value for money’.</p>
2	<p>When planning procurements, the Attorney-General’s Department:</p> <ul style="list-style-type: none"> • ensures that potential suppliers are required to provide all the information that is relevant for the purposes of evaluation, and not ask for any information that is not required; • where data that is required for evaluation is not provided by a tenderer, this should be reflected in the tender either being excluded or a lower score against the relevant criterion (where the missing information relates to the evaluation criteria); and • where data that is required for evaluation has been provided, the department should have a plan to evaluate this information, and it should be evaluated in full by the department. 	<p>Departmental staff have also received further articles on the topics of achieving value for money, conflict of interest and integrity. These articles provided case studies of good and poor procurement practices. Staff have also been advised of the conflict of interest (Col) framework issued by the Australian Public Service Commission on 9 September 2025.</p> <p>The department has sought better practice examples from other Commonwealth agencies, including the Department of Finance, and has consulted with the Australian Government Solicitor and the Department’s Office of Corporate Counsel.</p> <p>On 3 October 2025 the department completed a review of internal procurement templates (e.g. tender evaluation plans, requests for tender templates) and guidance to address the ANAO findings, reflect better procurement practices, and assist staff when they undertake an open tender.</p>
3	<p>The Attorney-General’s Department improve its procurement framework to address the conduct of additional processes, including collaboration activities to ensure they are conducted in a fair and transparent manner.</p>	<p>The revised templates incorporate further drafting instructions to assist staff meet their record keeping requirements including maintaining accurate and concise records of the process, demonstrating how value for money was considered and achieved, and articulating other relevant decisions and the basis of those decisions.</p>
4	<p>The Attorney-General’s Department strengthen its adherence to recognised principles and processes for conducting</p>	

No.	Recommendation	Actions and timing
	procurements ethically, including the identification and effective management of conflicts of interest.	The revised guidance includes two new checklists to assist the procurement evaluation committee members, and the spending delegate, successfully perform their roles and in meeting their obligations under the Commonwealth Procurement Rules.
5	When developing evaluation plans, the Attorney-General’s Department ensure that the planned evaluation addresses all information tenderers are required to include in submissions.	<p><u>Ongoing actions</u></p> <p>Departmental staff must maintain their procurement knowledge by completing procurement training relevant to their roles.</p>
6	The Attorney-General’s Department improve its procurement record keeping so that accurate and concise information exists on the process that was followed, how value for money was considered and achieved, and relevant decisions and basis of those decisions.	<p>Further, where departmental staff are members of a procurement evaluation committee, they must also complete further training relating to their role on the committee before they begin the tender evaluation process. Where required by the probity plan, they must also attest that they have read and understood the plan.</p> <p>The department will provide all officers undertaking new open tenders commencing in the department with a briefing from the department’s internal procurement team that will cover general requirements, guidance and support, a high-level review of request for tender documentation and incorporate the lessons learnt from this audit.</p> <p>The department will utilise behavioural insights to embed the lessons learnt from the audit into the business-as-usual activity of all relevant staff.</p>