

28 January 2026

Joint Standing Committee on Implementation of National Redress Scheme
PO Box 6021
Parliament House
CANBERRA, ACT 2600

Submission to Inquiry into the continuing operation of the National Redress Scheme

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Blue Knot Foundation is Australia's National Centre for Excellence on Complex Trauma. It is a Redress Support Service which has been funded to provide information, referral and application support to people engaging with the National Redress Scheme since its inception.

Executive Summary

The National Redress Scheme (NRS) is approaching its legislated conclusion at a time when processing delays, unresolved applications, and escalating case complexity mean many survivors will remain engaged with Scheme processes well beyond June 2028. On current processing timelines, many applicants who lodge before 30 June 2027 will not receive a final outcome before 30 June 2028.

Drawing on more than eight years of national Redress Support Service delivery, Blue Knot Foundation submits that current operational settings do not adequately align with processing realities or survivor needs, creating a material risk of inequitable and unjust outcomes as the Scheme approaches closure.

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As at 31 August 2025, more than 40,500 applications remained without an outcome advised. Delays are driven by section 24 procedural fairness processes, institutional responses, capacity constraints across multiple processing stages, and variability in decision-making and review pathways.

These dynamics disproportionately affect unsupported applicants and vulnerable cohorts, including First Nations survivors, people with disability, incarcerated survivors, older applicants, and those living in regional or remote areas.

While the 2024 reforms significantly improved formal access, expanded eligibility has coincided with increased procedural complexity and has not, on its own, ensured effective access to justice for survivors who cannot self-navigate. Without specialist support, survivors are at heightened risk of re-traumatisation, disengagement, or accepting outcomes without informed advice, especially at late stages.

There is currently no clearly articulated transition plan for Redress Support Services as the Scheme approaches its conclusion. If funded support ceases in June 2028 while determinations, reassessments and internal reviews remain unresolved, survivors will be left without assistance at the most consequential stages of the process, undermining procedural fairness, equity, and the Scheme's statutory objectives.

Blue Knot Foundation submits that:

- current Scheme timelines do not reflect actual processing durations or survivor experience;
- DSS has not yet consistently met survivor expectations for a timely, trauma-informed, consistent, survivor-focused process;
- Redress Support Services are a core risk-mitigation and system-stabilisation function; and
- funding for Redress Support Services must be extended beyond June 2028 at least to June 2030 regardless of whether the Scheme itself is formally extended.

Sustained investment in system capacity, decision quality, communication, and specialist survivor support is essential to maximise just outcomes and ensure the Scheme delivers on its statutory purpose and the intent of the Royal Commission.

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1. Introduction and Context

The National Redress Scheme (NRS) was established in response to the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse to provide a survivor-centred, trauma-informed alternative to civil litigation. As the Scheme approaches its legislated conclusion, unresolved applications, extended processing times, and the absence of clear transition arrangements risk undermining its statutory objectives and the expectations of survivors.

This inquiry occurs at a critical juncture. Evidence from Scheme reporting, audit findings, and frontline service delivery indicates that many survivors will remain engaged in active Scheme processes well beyond the Scheme's scheduled end date of 30 June 2028. These include information requests, determinations, reassessments, and internal reviews. Decisions taken now regarding timelines, funding, and transition arrangements will therefore materially affect whether survivors experience the Scheme as just, accessible, and restorative, or as another process marked by delay, complexity, and abandonment.

For the purposes of these Terms of Reference, Blue Knot Foundation supports an open and inclusive understanding of "survivors", consistent with the Royal Commission's intent. This includes, but is not limited to, Aboriginal and Torres Strait Islander peoples, people with disability, care leavers, former child migrants, incarcerated survivors, people from culturally and linguistically diverse backgrounds, survivors who may be eligible but unable to apply, and survivors recently deemed ineligible for redress.

Blue Knot Foundation (Blue Knot) provides specialist national Redress Support Services and trauma-informed counselling to adult survivors of institutional childhood sexual abuse and their supporters. Blue Knot supported survivors through the Royal Commission and has delivered Redress Support Services throughout the life of the National Redress Scheme. This longitudinal involvement positions Blue Knot to observe systemic trends, emerging risks, and equity impacts as the Scheme concludes.

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This submission addresses the Committee's Terms of Reference by drawing on frontline Redress Support Service delivery insights, Scheme data, audit findings, and survivor experience to examine:

- the alignment between Scheme timelines and processing realities;
- the adequacy of transition planning and funding for support services;
- systemic drivers of delay and case complexity;
- risks to just outcomes for outstanding applications and reviews;
- access to justice for vulnerable cohorts following the 2024 reforms; and
- whether the operation and administration of the Scheme by the Department of Social Services is meeting survivor expectations and the Scheme's statutory objectives.

The submission focuses on practical, evidence-based considerations necessary to ensure that the National Redress Scheme concludes in a manner that preserves survivor safety, equity, and access to justice, consistent with its founding purpose.

2. DSS Performance Against Survivor Expectations and Statutory Objectives

The Royal Commission into Institutional Responses to Child Sexual Abuse envisaged a National Redress Scheme that was accessible, trauma-informed, timely, consistent, survivor-focused, and supported by specialist assistance. These principles underpin the Scheme's statutory objectives to recognise the harm of institutional child sexual abuse, alleviate its impacts, and provide survivors with justice outside of more adversarial legal processes.

While the Department of Social Services (DSS) has implemented a number of legislative and policy reforms (most notably through the 2024 amendments) evidence from Scheme reporting, audit findings, and insights from frontline Redress Support Service delivery indicates that, in practice, Scheme administration does not yet consistently meet survivor expectations or fully realise the Scheme's statutory intent. The shortfalls are systemic rather than individual and are becoming more acute as the Scheme approaches closure.

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2.1 Timeliness and certainty of outcomes

Survivors reasonably expect redress to be delivered within timeframes that do not compound harm. Processing times remain lengthy, with significant backlogs and large volumes of applications awaiting determination, additional information, or internal review. Extended periods of uncertainty are commonly experienced by survivors as distressing and destabilising, particularly for older applicants and those with deteriorating health. These delays are not consistent with a trauma-informed and restorative approach and undermine confidence in the Scheme as a mechanism for timely justice.

Independent audit findings indicate that delays are systemic and worsening. The Australian National Audit Office assessed Scheme administration as only “partly effective”, reporting increasing waiting times, a substantial proportion of applicants still awaiting outcomes, and a high-rated risk of not finalising applications by 30 June 2028. Public survivor accounts have also highlighted distress associated with prolonged waiting and limited communication, including re-triggering and disengagement for some survivors. These outcomes are at odds with a trauma-informed, survivor-centred model of redress.

2.2 Consistency and quality of decision-making

Comparable cases should result in comparable outcomes. However, evidence indicates ongoing inconsistency in the application of assessment frameworks at the Independent Decision Maker (IDM) stage. Findings from the Australian National Audit Office indicate that key quality assurance mechanisms intended to promote consistent decision-making have not been fully embedded in practice. This variability contributes to concerns about procedural fairness and higher rates of internal review, prolonging resolution and eroding survivor confidence in the fairness of outcomes.

2.3 Trauma-informed delivery in practice

Although trauma-informed principles are reflected in the Scheme design, their operationalisation remains uneven. Procedural fairness processes, repeated information requests, and formal correspondence are frequently experienced by survivors as adversarial or invalidating, re-triggering dynamics of not being believed and institutional harm identified by the Royal Commission.

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Inconsistent communication and long periods without contact further exacerbate distress and disengagement.

2.4 Accessibility and equity of access

Legislative reforms in 2024 materially improved formal eligibility settings. However, practical access to justice remains uneven, particularly for survivors without specialist support. Barriers related to literacy, disability, incarceration, digital access, remoteness, and system complexity continue to affect who can engage effectively with the Scheme. Survivors who are not supported are more likely to experience delays, additional information requests, and adverse or contested outcomes, resulting in inequitable access.

2.5 Survivor-centred versus institution-driven processes

The Royal Commission intended that survivors should not bear the burden of navigating institutional disputes. In reality, institutional responses and procedural fairness processes remain significant drivers of delay and complexity. The emotional and procedural burden of resolving these issues frequently falls on survivors, meaning the Scheme is deviating from its intended survivor-centred orientation.

2.6 Continuity of specialist support

Access to specialist Redress Support Services is integral to fairness, safety, and informed decision-making. While such services demonstrably improve outcomes and reduce risk, access remains limited and funding uncertainty threatens continuity – especially as applications, determinations, reassessments, and internal reviews extend beyond the Scheme’s scheduled end. This fragility undermines the Scheme’s capacity to deliver equitable outcomes at scale.

2.7 Overall assessment

DSS has made meaningful efforts to improve the Scheme’s design and accessibility, particularly through the 2024 reforms. However, delivery has not yet consistently met survivor expectations for a process that is timely, understandable, consistent, trauma-informed, and that does not place the burden of system complexity onto survivors.

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Without sustained investment in system capacity, decision-making quality, communication, and specialist survivor support, especially in the Scheme's final years, there is a material risk that the National Redress Scheme will not fully achieve the justice it was established to provide.

3. Scheme Timeline, Processing Reality, and the Case for Extension

The National Redress Scheme is legislated to close to new applications on 30 June 2027, with all Scheme operations scheduled to conclude on 30 June 2028. Evidence from Scheme reporting, audit findings, and frontline Redress Support Service delivery indicates that these timelines do not align with current processing realities or survivor experience.

3.1 Processing timeframes and operational reality

Current Scheme advice indicates that applications may take up to two years from lodgement to determination. Evidence from Blue Knot Foundation's service delivery indicates that timeframes frequently exceed this estimate, particularly where section 24 information requests, procedural fairness processes, institutional objections, or internal reviews are involved. Where applicants seek internal review, an additional six to twelve months is commonly required.

These observed timeframes align with findings of the Australian National Audit Office, which reported an average wait time of approximately 16 months, increasing backlogs, and that around 60 per cent of applicants remained without outcomes at the time of audit. The ANAO further identified a high risk that applications would not be finalised by the Scheme's legislated end date of 30 June 2028.

As a result, a substantial cohort of survivors who lodge applications prior to the Scheme's cut-off date will remain engaged in active Scheme processes well beyond June 2028. These applicants will continue to require case management, advocacy, and trauma-informed support to engage safely with late-stage information requests, determinations, reassessments, and review pathways.

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3.2 Impact of current timelines on survivors and outcomes

Extended processing timelines are not simply an administrative issue. For survivors of institutional child sexual abuse, prolonged uncertainty compounds trauma impacts, undermines stability, and increases the risk of disengagement, deterioration, or harm. This is particularly the case for older applicants, people with disability, First Nations survivors, and those with complex health or psychosocial needs. The data are compelling that adverse childhood events have a lasting impact on health and well-being. The negative experiences of childhood trauma can affect growth and development and lead to physical, mental and behavioural health problems.

Delays also increase the likelihood that survivors will encounter additional procedural hurdles closer to Scheme closure, including section 24 procedural fairness processes and internal review timeframes colliding with legislated end dates. In the absence of legislative flexibility or transitional arrangements, these dynamics materially increase the risk that survivors will be excluded from redress, or experience outcomes that fall short of the Scheme's restorative intent.

3.3 Governance and legislative capacity to review and extend Scheme settings

The National Redress Scheme's legislated timelines are not immutable. The National Redress Scheme for Institutional Child Sexual Abuse Act 2018, the National Redress Scheme Rules 2018, and the Intergovernmental Agreement collectively provide mechanisms through which Scheme settings, including application cut-off dates, operational end dates, and transitional arrangements, may be reviewed and amended where required.

The 2024 legislative reforms demonstrate Parliament's willingness to adjust the Scheme in response to emerging evidence about access, fairness, and equity. In the context of current backlog volumes, extended processing timeframes, and increasing application demand, there is now a clear governance basis for reviewing whether existing statutory deadlines remain appropriate.

The Australian National Audit Office has identified a high risk that applications will not be finalised by 30 June 2028 under current settings.

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In parallel, Scheme data and frontline service delivery evidence indicate that a substantial cohort of survivors who lodge applications prior to the legislated cut-off will remain engaged in active processes well beyond that date.

The Royal Commission did not envisage a fixed closing date for redress schemes operating under backlog conditions. It recommended that schemes should not close until applications reduce to a level where closure is reasonable, and that sufficient notice be provided once closure is contemplated. These principles remain directly relevant to the current operation of the Scheme.

In this context, a formal review of legislative time limits governing the National Redress Scheme is both warranted and necessary to ensure that statutory settings do not inadvertently exclude survivors or undermine the Scheme's restorative purpose. Any such review should explicitly consider options to extend application and/or operational timeframes, alongside transitional arrangements that ensure continuity of support for survivors whose applications, determinations, reassessments, or reviews remain unresolved.

These considerations underpin Recommendation 7 in Section 9.2, which calls for a formal review of legislative settings governing Scheme closure.

3.4 Current backlog profile and processing stages

As at 31 August 2025, the Scheme had received 66,826 applications, with 40,513 applications yet to have an outcome advised. Of these, 27,561 applications were actionable by the Scheme, while significant volumes remained distributed across validation, information gathering, and determination stages.

Notably:

- 13,576 applications were in the information-gathering stage;
- 6,039 applications were with an Independent Decision Maker (IDM) for determination;
- 5,046 applications were awaiting additional information from applicants; and
- 6,027 applications were recorded as on hold.

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This distribution indicates that delay is not confined to a single bottleneck, but is embedded across multiple stages of Scheme processing. These figures are inconsistent with an assumption that the remaining workload can be resolved within existing statutory timeframes without further intervention.

3.5 The case for extending Redress Support Services beyond 2028

Regardless of whether the Scheme itself is formally extended, funding for Redress Support Services must be extended beyond June 2028, and at a minimum until June 2030. Evidence from service delivery consistently shows that support needs do not diminish after lodgement; rather, they intensify at later stages, including during information requests, determinations, reassessments, and internal reviews.

The cessation of funded Redress Support Services while applications and reviews remain unresolved would leave survivors without assistance at the most critical stages of the process. This would undermine accessibility, procedural fairness, equity, and the Scheme's statutory objectives, particularly for survivors who face barriers to self-navigation.

3.6 Submission

Blue Knot Foundation submits that:

- the current Scheme timeline does not reflect actual processing durations or applicant experience;
- there is a clear legal and governance basis to extend Scheme operational settings if required; and
- funding for Redress Support Services must be extended until at least June 2030 to ensure survivors are not abandoned mid-process and to maximise just outcomes as the Scheme approaches its conclusion.

4. Systemic Processing Delays and Decision-Making Constraints

Evidence from frontline Redress Support Service delivery, Scheme data, and audit findings indicates that current processing delays within the National Redress Scheme are systemic and institutional in nature, rather than the result of individual applicant behaviour.

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Delays arise from the interaction of procedural fairness processes, institutional responses, system capacity constraints, and inconsistent decision-making across multiple stages of the Scheme.

4.1 Increase in section 24 (S24) information and procedural fairness requests

Blue Knot Foundation has observed a marked increase in applicants seeking assistance after receiving section 24 (S24) requests, including requests for additional information, procedural fairness processes, and suspected fraud matters.

These requests are time-critical and resource-intensive, requiring skilled caseworkers to:

- analyse institutional responses;
- obtain and review Scheme documentation;
- research historical records;
- support applicants to respond accurately and safely; and
- manage the significant emotional impact on survivors, many of whom experience re-traumatisation when challenged or perceive they are not believed.

For new client engagements involving an S24 request, Blue Knot estimates indicative timeframes of:

- 4–5 weeks to establish nominee arrangements and obtain documentation;
- 6–12 weeks (approximately six sessions) to revise applications and complete supporting research; and
- a further 6–7 weeks where specialist legal advice is required.

These timeframes demonstrate that support needs frequently intensify later in the process, rather than concluding at application lodgement.

4.2 Institutional objections as a primary driver of delay

Blue Knot's service data indicate that a substantial proportion of S24 requests arise from procedural fairness processes triggered by institutional objections or challenges to applicant accounts, rather than deficiencies in initial applications alone.

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Applicants frequently seek support only after receiving an S24 letter, particularly when they lodged without early assistance.

These observations align with findings of the Australian National Audit Office, which reported that 6,144 applications were awaiting additional information or special assessment, with a further 6,549 applications on hold at the time of audit. The scale of paused applications highlights structural bottlenecks within Scheme processes rather than isolated or applicant-driven delay.

4.3 Impact on unsupported applicants

Self-submitted applicants are more likely to receive S24 requests, often due to limited initial detail and lack of early framing consistent with the assessment framework. While S24 letters frequently prompt engagement with Redress Support Services, this typically occurs late in the process and can compound delays, particularly where correspondence is not promptly opened, understood, or responded to (consistent behaviours with adverse childhood events).

Without specialist support, applicants are at heightened risk of:

- misunderstanding procedural requirements;
- providing incomplete or inconsistent responses;
- missing critical deadlines; and
- experiencing adverse or delayed outcomes.

4.4 Independent decision-making and review delays

Blue Knot has observed inconsistencies in outcomes at the Independent Decision Maker (IDM) stage, contributing to higher decline rates and a corresponding increase in internal review requests. Variable interpretation and application of the assessment framework often results in additional information requests, even where comparable applications have progressed without them.

These observations align with Australian National Audit Office findings that the Independent Decision-Making Quality Framework, introduced in 2021 to promote consistency and fairness, has not yet been fully embedded in practice. Inconsistent decision-making increases procedural fairness activity and review rates, further extending processing timeframes and compounding uncertainty for survivors.

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Given the volume of applications still awaiting determination, there is a growing risk that applicants may only be able to seek internal review close to, or beyond, the legislated end of the Scheme, limiting access to timely and effective redress.

4.5 Summary of systemic drivers

Taken together, processing delays are driven by:

- institutional objections triggering procedural fairness processes;
- insufficient early framing of applications, particularly for unsupported applicants;
- system capacity constraints reflected in large volumes of paused applications; and
- inconsistent application of assessment frameworks and decision-quality controls.

These factors demonstrate that delays are primarily the result of institutional and process-level inefficiencies, rather than survivor behaviour or application quality alone.

5. Outstanding Applications, Escalating Complexity, and Risks to Just Outcomes

As the National Redress Scheme approaches its legislated conclusion, current processing trends indicate that a substantial number of applicants will remain engaged in active Scheme processes.

Many survivors will still be:

- awaiting initial determinations;
- responding to late-stage information and procedural fairness requests, including section 24 letters; and
- navigating internal reviews of decisions.

On current trajectories, the cessation of funded Redress Support Services in June 2028 would leave many survivors without assistance at the most critical point in the process i.e. when determinations are being finalised or reviewed, and when informed, trauma-informed guidance is essential to achieving just outcomes.

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5.1 Escalating case management complexity

Drawing on its role as a specialist Redress Support Service supporting survivors through the Royal Commission and more than eight years of Scheme operation, Blue Knot Foundation is observing a marked escalation in the complexity, intensity, and duration of case management as processing times lengthen.

Caseworkers report increasing presentations involving:

- chronic and deteriorating physical and mental health conditions;
- housing instability and social isolation;
- acute financial distress; and
- difficulty accessing affordable, trauma-informed counselling and specialist services.

Extended delays have a significant impact. For survivors of institutional child sexual abuse, prolonged uncertainty operates as a sustained stressor that compounds trauma impacts, undermines stability, and increases the risk of deterioration or disengagement while applicants await determination. These impacts accumulate over time and are most pronounced for survivors already experiencing marginalisation or complex needs.

Public survivor accounts further demonstrate that prolonged waiting, particularly where communication is limited or unexplained, can re-activate shame, fear, and invalidation, and in some cases lead survivors to disengage from the Scheme altogether.

5.2 Risks associated with lack of support at late stages

Evidence from frontline service delivery consistently demonstrates that lack of access to Redress Support Services at later stages of the process materially affects both survivor wellbeing and outcomes. Survivors without support are more likely to:

- submit incomplete or insufficiently framed responses to information requests;
- misunderstand correspondence or miss critical deadlines;
- experience re-traumatisation during procedural fairness processes; and
- disengage or accept outcomes without fully understanding their rights or review options.

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Section 24 letters, in particular, frequently trigger re-emergence of feelings of disbelief and invalidation, with observable deterioration in mental health and increased risk of suicide harm for some applicants. Survivors with difficulties in reading, writing, or comprehension are especially vulnerable where correspondence is not understood or acted upon.

Scheme data indicate that thousands of applications are currently paused while awaiting further information from applicants or remain subject to extended decision-making timeframes. As at 31 August 2025, more than 5,000 applications were awaiting additional applicant information, and over 6,000 were with Independent Decision Makers for determination.

For survivors with complex trauma, disability, cognitive impairment, limited literacy, or unstable housing, these pauses significantly increase the risk of disengagement, missed deadlines, or adverse outcomes, especially in the absence of specialist support.

5.3 Equity impacts

Equity impacts are substantial. Scheme reporting indicates that Redress Support Services assist fewer than 20 per cent of total applicants, while up to 100 section 24 letters are issued each week in relation to additional information and procedural fairness, many to applicants without specialist support.

This disparity creates a material risk that a significant number of applications, particularly those lodged by unsupported applicants, will remain unresolved, paused, or disadvantaged at the Scheme's legislated end. Survivors most affected include people with disability, First Nations survivors, older applicants, and those living in regional or remote areas.

5.4 Implications for just outcomes

Without continued access to specialist support, extended processing timelines and late-stage procedural requirements will undermine the Scheme's capacity to deliver just outcomes.

To mitigate these risks, continued funding for Redress Support Services is essential to:

- support applicants to respond effectively to late-stage information and procedural fairness requests;

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- assist survivors to understand, consider, and make informed decisions about determinations;
- support internal review processes; and
- ensure applicants are not pressured to accept outcomes without appropriate advice or support.

5.5 Economic cost of waiting

Delays in redress processing carry measurable economic costs for government, participating institutions, and the broader service system. These costs arise not only from extended Scheme administration, but from the downstream impacts of prolonged uncertainty on survivor health, service utilisation, and economic participation.

Health system impacts. Survivors who come forward and then wait extended periods for an outcome often experience deterioration in mental health, increasing reliance on acute and tertiary services. In a trauma-informed context, prolonged uncertainty functions as a sustained stressor that escalates service need and complexity.

Productivity and welfare impacts. There is a well-established relationship between complex trauma and reduced workforce participation, interrupted employment, and higher reliance on income support. Extended delays that postpone access to counselling and validation are likely to magnify these impacts.

System substitution into civil litigation. A further consequence of sustained delay is the risk that some survivors elect to pursue civil claims. One of the Scheme's intended advantages is to reduce adversarial litigation and associated institutional and government legal costs. Where delays erode confidence or collide with statutory deadlines, incentives to seek alternative legal pathways increase.

Taken together, backlog persistence is not merely an administrative issue; it generates avoidable public expenditure and service demand across multiple portfolios.

5.6 Human cost of waiting

The National Redress Scheme was conceived as a humane alternative to litigation – a mechanism to acknowledge harm and support recovery. Delay subverts that intent. For survivors, prolonged waiting can replicate the original

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dynamics of powerlessness, with institutions controlling the process and timing offering limited transparency or explanation.

Blue Knot caseworkers report worsening depression, anxiety, and suicidal ideation associated with prolonged uncertainty. Public survivor accounts similarly describe heightened anxiety, intrusive memories, and re-triggering while awaiting outcomes, especially where communication is limited.

Critically, many survivors are not primarily seeking money; they are seeking recognition, accountability, and apology. Where processing times extend into years, the Scheme risks delivering outcomes too late to achieve its restorative purpose, particularly for older applicants or those with deteriorating health.

5.7 Submission

There is a significant risk that the National Redress Scheme will conclude with unresolved, inequitable, and harmful outcomes for many survivors. These are outcomes which are not consistent with the Scheme's statutory objectives and the intent of the Royal Commission.

6. Accessibility and Access to Justice Following the 2024 Reforms

The 2024 amendments to the National Redress Scheme represented a significant and welcome expansion of formal access to justice. Changes including the removal of prison restrictions, narrowing of criminal conviction exclusions, enhanced review rights, reassessment of previously finalised applications, removal of statutory declaration requirements, and improved recognition of the impact of abuse directly addressed barriers identified in the Second Year Review and through survivor advocacy.

Collectively, these reforms improved eligibility, procedural fairness, and flexibility for many survivors, particularly incarcerated survivors, people with criminal records, First Nations survivors, older applicants, and those previously excluded due to institutional non-participation or inability to fully disclose at initial lodgement.

6.1 Expanded access does not guarantee effective access

While the reforms substantially improved formal eligibility, they have not, on their own, ensured effective access to justice, particularly for survivors with complex trauma, cognitive impairment, low literacy, limited digital access, or deep distrust of institutions.

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In practice, expanded eligibility has been accompanied by increased procedural complexity. Survivors are now required to:

- understand revised eligibility thresholds and offence categories;
- navigate new review and reassessment pathways;
- provide additional or new information at review stages; and
- respond to post-lodgement requests, including section 24 procedural fairness processes, under compressed or unfamiliar timeframes.

For many vulnerable applicants, these requirements remain difficult to navigate without specialist, trauma-informed support.

6.2 Differential impacts on vulnerable cohorts

Blue Knot Foundation's experience as a national Redress Support Service indicates that applicants living with vulnerabilities are disproportionately affected by post-2024 procedural complexity. Without support, they are more likely to:

- lodge applications without sufficient framing against the assessment framework;
- misunderstand or fail to respond to Scheme correspondence;
- experience re-traumatisation when procedural fairness processes are triggered; and
- disengage from the Scheme or accept outcomes without fully understanding their rights or review options.

These impacts are compounded by extended processing timeframes and inconsistent communication, meaning that expanded eligibility does not reliably translate into equitable outcomes without specialist support.

6.3 Role of Redress Support Services in realising reform intent

The 2024 reforms increase the importance of Redress Support Services rather than diminish it. Expanded eligibility and review mechanisms only achieve their intended effect where survivors are supported to:

- understand and exercise new rights;
- engage safely with review and reassessment processes;
- respond effectively to late-stage information and procedural fairness requests; and
- make informed decisions about offers, reviews, or alternative pathways.

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While funding for specialist legal services and targeted information-gathering initiatives is critical, legal assistance alone does not address the ongoing psychosocial, practical, and navigational needs of highly traumatised applicants across extended timeframes.

6.4 Equity risks as the Scheme approaches closure

As Scheme deadlines approach, there is a heightened risk that cohorts living with vulnerabilities, despite expanded eligibility, will be disproportionately unable to benefit from the reforms without sustained, accessible support. This risk is greatest for:

- incarcerated survivors and those recently released;
- people living in regional and remote areas;
- First Nations survivors;
- older applicants with declining health; and
- survivors engaging with the Scheme for the first time late in its life.

Without continued funding for Redress Support Services beyond Scheme closure, the 2024 reforms risk improving access in principle while failing to deliver equitable access in practice. Scheme demographic data underscore this risk: in August 2025, 33.9 per cent of applicants identified as First Nations, 32.1 per cent indicated they were living with disability, and 16.9 per cent identified as care leavers. These are cohorts who are disproportionately affected by barriers to self-navigation which is consistent with the adverse childhood events evidence and most likely to require sustained, specialist support to engage safely with extended Scheme processes.

6.5 Submission

To fully realise the access-to-justice intent of the 2024 reforms, legislative change must be matched with sustained investment in trauma-informed support infrastructure. Continued funding for Redress Support Services is essential to ensure that expanded access rights translate into safe engagement, informed decision-making, and just outcomes for survivors living with vulnerabilities.

7. Transition Planning and the Role of Redress Support Services

As the National Redress Scheme approaches its legislated conclusion, there is currently no clearly articulated or publicly available transition plan outlining how survivors will be supported once funded Redress Support Services cease in June 2028. This absence represents a significant gap in Scheme governance and

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creates material risk for survivors who will remain engaged in active Scheme processes beyond that date. The risks outlined in Sections 5 and 6 of this document crystallise in the absence of transition planning.

7.1 Absence of a defined transition framework

To date, the Department of Social Services (DSS), as Scheme Operator, has not provided guidance on:

- whether Redress Support Services will be extended, phased down, or transitioned;
- how survivors with outstanding applications, determinations, reassessments, or internal reviews will be supported after June 2028;
- which entity or service system will assume responsibility for Scheme-specific case management, advocacy, and procedural support once current funding ends; or
- how continuity of care will be maintained for survivors who have engaged with Redress Support Services over extended periods.

In the absence of a defined transition framework, there is a substantial risk that survivors will be left without support during the most complex and consequential stages of the Scheme. This gap is underscored by Australian National Audit Office findings that, despite planning for Scheme closure commencing in mid-2025, no detailed communication or survivor transition plan had been developed.

7.2 Why phasing down support services is not viable

Any assumption that survivor support needs will diminish as the Scheme concludes is inconsistent with service delivery evidence. In practice, support needs often intensify over time, particularly where:

- section 24 procedural fairness requests are issued;
- institutions contest applicant accounts;
- determinations are delayed or declined; or
- applicants seek internal review close to, or after, the Scheme's scheduled end.

Phasing down Redress Support Services while complexity, uncertainty, and emotional risk remain high would undermine accessibility, procedural fairness, and survivor safety.

7.3 Lack of viable alternative support pathways

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There is currently no clarity regarding who would hold responsibility for survivor support after June 2028. Implicit assumptions appear to include:

- reliance on mainstream community or mental health services;
- referral to state-based or non-government services not funded or designed to provide Scheme-specific support; or
- expectation that survivors will self-navigate remaining processes without specialist assistance.

None of these options constitute a viable transition pathway. Mainstream services generally lack the mandate, expertise, and resourcing to provide:

- Scheme-specific procedural guidance;
- advocacy in response to institutional objections;
- support through determinations, reassessments, and internal reviews; or
- trauma-informed navigation of redress-related decision-making.

7.4 Accessibility and equity risks

Without funded, specialist transition arrangements, access to support post-June 2028 is likely to become fragmented and inequitable. Survivors most affected will include:

- First Nations survivors;
- people with disability or cognitive impairment;
- survivors in regional and remote areas;
- older applicants with deteriorating health; and
- survivors with limited literacy, digital access, or informal supports.

This risks entrenching inequity at the point the Scheme is concluding, contrary to its statutory objectives and the intent of the Royal Commission.

7.5 Submission

Blue Knot Foundation submits that:

- there is currently no adequate transition plan for Redress Support Services as the Scheme concludes;
- phasing down services while applications and reviews remain unresolved would place survivors at significant risk;
- DSS retains responsibility, as Scheme Operator, for ensuring continuity of support until Scheme processes are substantively complete; and

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- ongoing, dedicated funding for Redress Support Services either through extension of Scheme funding or a clearly defined alternative funding stream is essential to ensure accessibility, equity, and just outcomes beyond June 2028.

Without such arrangements, survivors will be left to bear the consequences of unresolved Scheme delays and systemic complexity without appropriate support.

8. Planning for Increased Demand as the Scheme Approaches Its Legislated Conclusion

Available Scheme data indicate that application volumes are increasing rather than tapering as the National Redress Scheme approaches its legislated conclusion. As noted in the Australian National Audit Office audit, applications increased by 373 per cent between 2018–19 and 2024–25. Recent data indicate this trend continues: over the six months to 31 August 2025, the Scheme has received, the Scheme has received an average of 1,583 applications per month, compared with fewer than 500 per month prior to FY21–22. These figures demonstrate that assumptions of a “natural wind-down” are not supported by current demand.

This pattern is consistent with well-established features of survivor engagement. Many survivors require time, safety, and support before disclosing and engaging with formal redress processes. As Scheme deadlines become more apparent, it is foreseeable that additional survivors will seek to lodge applications in the final years of operation.

8.1 Anticipated increase in applications and implications for Redress Support Services

On current trajectories, further increases in applications are likely as awareness of eligibility changes and time limits grows. For many survivors, delayed application reflects trauma impacts, deteriorating health, distrust of institutions, disability-related barriers, and the cumulative effects of earlier failed justice processes. Without adequate provision for late or emerging applicants, survivors may be excluded from redress through circumstances beyond their control, undermining equity and the Scheme’s restorative intent.

Increasing application volumes will correspondingly increase demand for Redress Support Services. This demand will not be limited to initial lodgement; it will extend to later-stage procedural fairness processes, determinations, reassessments, and internal reviews which are often the most complex and time-critical stages for survivors. As many late-lodging applicants are unlikely to receive outcomes

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before June 2028, funding certainty beyond that date is essential to ensure survivors can engage safely and effectively through to resolution.

8.2 Risks of unmet demand

Failure to plan for increasing demand as Scheme deadlines approach will:

- exacerbate backlog pressure and processing delays;
- increase the proportion of unsupported applicants;
- heighten risks of re-traumatisation, disengagement, and adverse outcomes; and
- further entrench inequity for priority cohorts, including First Nations survivors, people with disability, older applicants, and those living in regional or remote areas.

8.3 Submission

Blue Knot Foundation submits that application growth is foreseeable and already evident, and that sustained resourcing—particularly continued funding for Redress Support Services beyond June 2028—is necessary to ensure increasing demand does not translate into avoidable harm, inequity, and diminished access to justice as the Scheme approaches its legislated end.

9. Conclusions and Recommendations

9.1 Conclusions

The National Redress Scheme was established to provide a survivor-centred, trauma-informed alternative to adversarial legal processes, consistent with the intent of the Royal Commission into Institutional Responses to Child Sexual Abuse. While legislative and policy reforms, most notably in 2024 have improved formal access and fairness, evidence from frontline service delivery, Scheme reporting, and audit findings indicates that administration has not yet consistently met survivor expectations or fully realised the Scheme’s statutory objectives.

As the Scheme approaches its legislated conclusion, unresolved applications, extended processing times, increasing procedural complexity, and the absence of clear transition arrangements create a material risk that survivors will experience the Scheme as delayed, inequitable, and harmful. These risks fall most heavily on cohorts living with vulnerabilities, including First Nations survivors, people with disability, incarcerated survivors, older applicants, and those living in regional or remote areas.

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Redress Support Services have emerged as a core risk-mitigation and system-stabilisation function, essential to procedural fairness, survivor safety, and informed decision-making across extended timeframes. However, current funding settings and the absence of a transition framework threaten continuity of support at precisely the point it is most needed.

Without decisive action, there is a real risk that the Scheme will conclude with unresolved, unjust, and inequitable outcomes inconsistent with its founding purpose and the expectations articulated by survivors and the Royal Commission.

9.2 Recommendations

The Parliamentary Joint Standing Committee's final report (tabled 26 November 2024) sets out a practical, evidence-based reform package and operational measures intended to improve timeliness, transparency, and survivor experience. Consistent with that report, Blue Knot Foundation supports measures including:

- extension of the Scheme beyond 2028 to avoid exclusion and inequity driven by backlog conditions and late-stage processing;
- surge resourcing to reduce the backlog, including investment in decision-making capacity, Scheme operations, specialist legal assistance, and Redress Support Services, to reduce downstream costs and minimise harm;
- guaranteed continuity of counselling and personal response supports for survivors whose applications and reviews continue beyond statutory deadlines, recognising the comparatively low cost of supportive interventions relative to relapse, hospitalisation, or serious adverse outcomes; and
- improved transparency and accountability, including routine public reporting of backlog volume, processing performance, and progress toward backlog reduction.

Legislative review is now warranted.

The Royal Commission did not envisage a fixed closing date for redress schemes operating under backlog conditions. Given current processing realities, escalating application demand, and the Australian National Audit Office's assessment of high risk to timely finalisation, a review of legislative time limits is necessary to ensure the Scheme remains capable of delivering just outcomes.

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Recommendations

To ensure the National Redress Scheme concludes in a manner that is just, equitable, and consistent with its statutory objectives, Blue Knot Foundation recommends that the Committee:

1. Extend funding for Redress Support Services beyond June 2028, at a minimum until June 2030, to ensure continuity of trauma-informed support for survivors with outstanding applications, determinations, reassessments, and internal reviews, regardless of whether the Scheme itself is formally extended.
2. Require the Department of Social Services to publish a clear, survivor-focused transition plan for Redress Support Services, to ensure survivors are not abandoned mid-process.

The plan should explicitly address:

- support arrangements for survivors post-June 2028;
 - responsibility for Scheme-specific case management and advocacy;
 - continuity of care for survivors engaged over extended periods; and
 - safeguards to prevent disengagement, inequity, or disadvantage at late stages.
3. Strengthen Scheme processing capacity and timeliness, to reduce backlog pressure and prolonged uncertainty, including through:
 - clear, enforceable service standards for key processing milestones;
 - proactive management of paused and stalled applications; and
 - transparent public reporting on progress toward backlog reduction.
 4. Embed and publicly assure decision-making quality and consistency, to improve fairness and reduce avoidable procedural delays, including through:
 - full implementation of the Independent Decision-Making Quality Framework;

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- routine calibration, quality review, and assurance processes; and
 - monitoring and public reporting on drivers of procedural fairness activity and internal reviews.
5. Improve trauma-informed communication and procedural fairness practices, to minimise re-traumatisation and disengagement, including through:
- plain-language, accessible correspondence;
 - nominee- and Redress Support Service-first contact pathways where appropriate;
 - proactive follow-up where information requests are unanswered; and
 - safeguards to reduce harm during procedural fairness processes.
6. Plan and resource for increased application demand as Scheme deadlines approach, to prevent late-stage inequity, including through:
- resourcing Redress Support Services to manage anticipated application surges;
 - targeted outreach and engagement with cohorts living with vulnerabilities; and
 - measures to ensure late-lodging applicants are not disadvantaged by timing or backlog conditions.
7. Review legislative settings governing Scheme closure, including the National Redress Scheme for Institutional Child Sexual Abuse Act 2018 and associated Rules, to assess whether the legislated application and operational end dates remain appropriate in light of:
- current backlog volumes and processing timeframes;
 - increasing application demand as Scheme deadlines approach;
 - the risk identified by the Australian National Audit Office of not finalising applications by 30 June 2028; and
 - the Royal Commission's recommendation that redress schemes should not close until applications reduce to a level where closure is reasonable.

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The review should explicitly consider options to extend application and/or operational timeframes to ensure survivors are not excluded or disadvantaged due to systemic delay. The review should report publicly and set out a recommended legislative pathway and timetable to ensure survivors are not excluded or disadvantaged due to systemic delay.

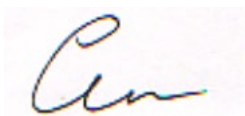
Return on investment and policy coherence

Implementing these measures is both health-policy sound and economically prudent. It reduces avoidable service-system costs associated with delay, strengthens equity of access to justice, and better aligns Scheme settings with the Royal Commission's intent for a survivor-centred, timely alternative to litigation.

Final observation

The success of the National Redress Scheme will ultimately be judged not only by the number of applications processed, but by whether survivors experience the Scheme as a process that recognises harm, alleviates impact, and delivers justice. Ensuring continuity of specialist support, addressing systemic delays, and protecting vulnerable survivors through the Scheme's final years are essential to honouring the commitments made through the Royal Commission.

Yours sincerely,



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