Summarising the evidence

Child maltreatment

Context brief

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## To what extent will addressing the gendered drivers of men’s violence against women help to prevent child maltreatment?

This brief is part of a suite of resources produced as part of the *Summarising the evidence* project. Visit the [project page](https://www.respectvictoria.vic.gov.au/what-we-know-about-drivers-of-violence) for the accompanying research summary, information about the scope and aims of the project and how it was conducted.

Respect Victoria gratefully acknowledges the work of the Australian Institute of Family Studies and all authors in conducting this work.

This brief is a companion document to the *Summarising the evidence* research summary by Higgins and Hunt1 that explores the prevalence, nature, drivers and reinforcing factors of child maltreatment.[[1]](#footnote-1)a Respect Victoria has used the findings in that summary, and other academic and practice literature, to consider how far our existing approaches to preventing men’s violence against women might take us towards better understanding why child maltreatment occurs, and how we can prevent it before it starts.

THE GENDERED DRIVERS AND REINFORCING FACTORS OF MEN’S VIOLENCE AGAINST WOMEN

*Change the story: A shared framework for the primary prevention of violence against women in Australia*2 identifies four gendered drivers of men’s violence against women:

the condoning of violence against women

men’s control of decision making and limits to women’s independence in public and private life

rigid gender stereotyping and dominant forms of masculinity

male peer relations and cultures of masculinity that emphasise aggression, dominance and control.

These drivers are each addressed with actions to prevent violence against women. These actions challenge the social contexts that allow violence to occur and help to address reinforcing factors that make violence more likely (explained in more detail below). The essential actions to address the gendered drivers are:

challenge condoning of violence against women

promote women’s independence and decision-making in public life and relationships

build new social norms that foster personal identities not constrained by rigid gender stereotypes

support men and boys to develop healthy masculinities and positive, supportive male peer relationships.

Understanding these drivers – and importantly, the actions to prevent them – are an important foundation for primary prevention efforts. This work helps us to understand the dynamics that allow violence to occur, including how power and control are used and abused.

Alongside the gendered drivers, *Change the story* also identifies further factors that can serve to reinforce violence against women. These do not predict violence against women on their own, but may influence the likelihood, prevalence or dynamics in different settings and contexts:

condoning of violence in general

experience of, and exposure to, violence (particularly during childhood)

factors that weaken prosocial behaviour (e.g. disasters and crises; settings where there is heavy alcohol consumption)

resistance and backlash to prevention and gender equality efforts.

INTERSECTIONAL APPROACHES TO UNDERSTANDING PREVENTION

*Change the story* emphasises that other forms of structural oppression intersect with gendered inequality to shape how and why men’s violence against women occurs. However, more work is needed to understand how they combine to shape the drivers of different forms of gendered and family violence and the way they are experienced across our communities.

The following evidence guides and frameworks have begun to explore these intersections, mapping shared and distinct drivers across different communities and developing tailored prevention approaches:

*Changing the picture: a national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children* which looks at how the gendered drivers play out as they intersect with colonialism for Aboriginal women3

*Changing the landscape: A national resource to prevent violence against women and girls with disabilities* which looks at how violence against women with disability is shaped by the intersection of ableism and the gendered drivers6

*Pride in prevention* which looks at the role of heteronormativity and cisnormativity alongside rigid gender roles in driving violence against LGBTIQA+ persons7,8

*Intersectionality Matters: A guide to engaging immigrant and refugee communities to prevent violence against women* which considers how intersections between the gendered drivers and other forms of structural oppression can be addressed to prevent violence against women who are from immigrant and refugee communities.9

Understanding the impact of different sources of oppression will also help us refine and expand upon the known actions to address the gendered drivers of men’s violence against women, creating safer communities for everyone.

## What is child maltreatment?

Child maltreatment can be defined as harmful acts or neglect from adult caregivers.[[2]](#footnote-2) It includes abuse, neglect, or exploitation that damages a child’s health or dignity, and is often perpetrated in the context of a trusting relationship.

This review identified five maltreatment types:

1. sexual abuse
2. physical abuse
3. emotional/psychological abuse
4. neglect
5. exposure to domestic violence.

All forms of child maltreatment and neglect are prevalent in Australia, are likely to co-occur, and have a significant impact on the health and wellbeing of those who experience them.4,5

While there is no clear set of drivers that consistently predict the different forms of child maltreatment, there are a complex range of individual and structural risk factors associated with different forms of maltreatment. These include:

* condoning of violence
* colonisation and discrimination against Aboriginal and Torres Strait Islander people
* exposure to and experience of family violence
* gendered drivers of violence
* heteronormativity and cisnormativity
* natural disasters, war and conflict
* poor parenting skills
* parental substance abuse
* parental history of childhood maltreatment
* socio-economic disadvantage.1,7

Research on protective factors is more limited, but they include:

* access to services and support
* greater economic stability
* education
* secure attachments and safe, stable and nurturing family relationships.1,7

For Aboriginal and Torres Strait Islander children and young people, maintaining connection with culture and identity is also a key protective factor.10

Families and children who are targeted by structural forms of discrimination experience higher rates of child maltreatment and heightened scrutiny from child protection and justice systems. For example, Aboriginal and Torres Strait Islander children are significantly more likely to be the subject of Child Protection notifications, be removed from their families and placed into out-of-home care, have poorer health and wellbeing outcomes while in out of home care, and are more likely to be hospitalised or killed.11,12 LGBTIQA+ children have poorer health and wellbeing outcomes and experience higher rates of child maltreatment and youth homelessness.1,13-15 Children with disability or mental health issues are also at higher risk of maltreatment than those without disability.1,7 Each of these cohorts of children face not only higher rates of maltreatment in the home, but also the risk of structural violence within child protection, justice, and healthcare systems.

## What do we know about gender and child maltreatment?

The evidence review by Higgins and Hunt1,7 suggests that gender plays an important role in all forms of child maltreatment. Specifically:

* Girls are more likely to experience maltreatment across most subtypes, however boys were found to experience comparable rates of physical abuse and exposure to domestic violence.
* Trans and gender diverse children are significantly more likely to experience all types of child maltreatment than cisgender children.
* Intimate partner violence between parents or carers is a significant factor in child maltreatment and is more commonly perpetrated by men against women.
* Most physical abuse of children is perpetrated by parents and is more commonly perpetrated by a male parent: 45% of physical abuse is perpetrated by a father or step-father versus 24% perpetrated by a mother or step-mother. Where abuse is perpetrated by a mother or step-mother, the victim is more likely to be a girl (66%) than a boy (35%).1,11

## Where might addressing the gendered drivers help in preventing child maltreatment?

Resources reviewed for this project largely frame gender as a risk factor for perpetration and victimisation, rather than a driver. This indicates that current knowledge of child maltreatment is centred more on who experiences it, where and how. This is crucial information that will inform development of primary prevention efforts and is also integral to understanding how to best structure early intervention and crisis response support. However, the evidence review reveals that currently, there are no agreed upon conceptual frameworks that speak to the normative social changes required to *prevent* child maltreatment. More research is needed to determine whether and to what extent the gendered drivers predict all forms of child maltreatment, and the role played by factors such as race, experience of disability, class and geographic location.

Nonetheless, evidence suggests that addressing the gendered drivers will help to prevent some forms of child maltreatment, specifically, research into child sexual offending behaviours and attitudes finds that, ‘child maltreatment and violence against women are social determinants of child sexual abuse.’16(p.33) This supports the argument that addressing the gendered drivers of men’s violence against women will help to prevent this form of abuse, including when it happens in the context of child maltreatment in the home.

Addressing the gendered drivers of violence against women is also likely to help prevent the most common form of child maltreatment ­­­­– exposure to domestic violence. This is supported by *Change the story*, which recognises that preventing violence against women is likely to help prevent violence against children in their care.2

Positive parenting programs that provide support for gender-equitable parenting and that challenge the condoning of violence are likely to help prevent forms of child maltreatment associated with harsh or authoritarian parenting, and antisocial or aggressive attitudes and behaviours.17 Gender transformative approaches to primary prevention that also address heteronormativity and cisnormativity as well as homo-, bi- and transphobia and associated rigid, harmful gender stereotypes are likely to benefit LGBTIQA+ children experiencing emotional, sexual or physical abuse.8

Respectful relationships education in schools is a critical setting for primary prevention efforts and speaks to all of the essential actions set out in *Change the story.* When provided with the support and resourcing to be implemented effectively and at scale, these programs play an important role in preventing and responding to child sexual abuse, for example, through deepening understanding of consent and creating safe environments where students can disclose abuse they are experiencing.

## Future directions for preventing child maltreatment

### Understanding the drivers of child maltreatment

All forms of child maltreatment have gendered patterns, however the elements that drive or underpin these forms of maltreatment are not necessarily always gendered or fully understood. Historically, child protection policies have focussed on the critical and important work of responding to child maltreatment after it occurs. However, effective primary prevention of child maltreatment must also consider the broader social context that makes high rates of child maltreatment possible, with specific attention to how different forms of inequality, oppression, and structural power (including gender) play in driving child maltreatment.

Literature and international conventions focusing on discrimination against children have focused on discrimination based on their race, gender, or experience of disability. Such focus remains critical. However, there is a growing recognition that discrimination against children should also recognise the broader discrimination children face simply due to their age.18 In Australia, children currently face political and legal disenfranchisement, and may be described as ‘unreliable witnesses’ to their own experiences of violence, whilst simultaneously being considered old enough to be criminally liable for their actions, or to work and pay tax. It is important to translate the gendered drivers of violence to the lives of children is highly relevant so that children have decision making power, are believed, are not stereotyped based on their age, and ultimately not exposed to violence.

Research into how the reduced agency afforded to children because of their age might help to drive child maltreatment should consider the way societal norms, policies, structures, and practices disadvantage children, justify their maltreatment, and dismiss or disbelieve them as victims. Research should also focus on how age intersects with other forms of inequality and discrimination based on gender, race, socioeconomic status, ability or LGBTIQA+ identity. The experiences of children with intersecting identities needs to be kept in sight. Here, we highlight particular areas of future focus for the prevention of abuse against Aboriginal and Torres Strait Islander and LGBTIQA+ children.

##### Recognising the role of colonisation

The dispossession and marginalisation that Aboriginal and Torres Strait Islander people experience because of colonisation is strongly linked to the adverse life outcomes that Indigenous families experience across different domains such as health, education and the over representation of Aboriginal and Torres Strait children and young people in the justice and child protection systems.19 Many Indigenous leaders and ACCOs consistently highlight that systemic discrimination, such as the forced removal of Aboriginal and Torres Strait Islander children from their families, still persists. While there has since been deliberate government action to implement reforms, there remain disproportionately high rates of Aboriginal and Torres Strait Islander children being removed from their families across Australia: around twice as many Aboriginal and Torres Strait Islander children are currently in out of home care than at the time of the National Apology to the Stolen Generations.20

*Changing the picture* asserts that addressing the drivers of violence against Aboriginal and Torres Strait Islander women requires a focus on addressing the ongoing impacts of colonisation and its overlap with the gendered drivers; healing the impacts of intergenerational trauma and strengthening culture and identity.3 Addressing these drivers is also likely to impact rates of child maltreatment, as both are influenced by similar underlying social and cultural factors. It is important to remember than many Aboriginal and Torres Strait Islander women and children experience violence from men who are not Indigenous, and also from systems and structures that have colonial roots.21

##### Recognising the role of cisnormativity and heteronormativity

Preventing the high rates of maltreatment of LGBTIQA+ children require addressing the societal norms that privilege cisgender and heterosexual identities and increase the risk of rejection, abuse and neglect for LGBTIQA+ children due to their gender identity or sexual orientation.

Efforts to address the impact of inequality and discrimination on LGBTIQA+ children have often been met with heated backlash.22,23 Further work is required to develop strategies for responding to backlash against equality programs focussing on the wellbeing and rights of LGBTIQA+ children and young people.24 These programs must be led by LGBTIQA+ communities, embedded across society, and supported by mutually reinforcing messaging from the broader gendered violence prevention sector to challenge cisnormativity and heteronormativity.

Violence against LGBTQIA+ children and young people is often both interpersonal and structural. When LGBTQIA+ children experience a lack of safety within healthcare, police, and school settings, they are denied access to social determinants of health that support their wellbeing, and prevent violence from family, peers, and responsible adults.25 They are also denied a chance to heal and recover from violence, creating a risk of intergenerational trauma.

### Child maltreatment in institutional settings

Respect Victoria and AIFS requested that the evidence review by Higgins and Hunt1 focus on child maltreatment in the home. It is also true that maltreatment in institutional settings remains a major issue in Australia, as demonstrated in the most recent Personal Safety Survey data from the Australian Bureau of Statistics.26 Childrens’ experiences of abuse in institutional settings demonstrate an extension of children experiencing harm from within the network of their trusted relationships.

The nexus of different response systems shows us how different forms of structural power can intersect to facilitate and compound child abuse. The Royal Commission into Institutional Responses to Sexual Abuse27 documents how institutions providing services to children, police, child protection agencies, criminal and civil justice systems all had inadequate responses, and at times actively created barriers for children who experienced sexual abuse to report this abuse, receive support, or to heal. Listening to the voices of children, and adults who experienced abuse as children, will be critical to shaping better prevention, early intervention and response services for the future.

As with other forms of child maltreatment, there are gendered patterns visible in institutional abuse of children with the Royal Commission into Institutional Responses to Sexual Abuse27 found that most perpetrators of child sexual abuse were male. Witness testimony from the Royal Commission showed the way that power structures actively dismissed or condoned violence, concentrated decision-making power with a small number of men, sometimes the abusers, and invoked outdated gender norms to give agency to abusers and silence victim-survivors.

Preventing children from entering institutions where they are made vulnerable to abuse might also be considered. Policies that drive child removal into out of home care can and should also be rethought. For example, social security settings that ingrain poverty and financial precarity for single mothers who have escaped violence, and that make it difficult for them to be able to provide for their children.28 Or a lack of community-based supports for disabled parents combined with stigma, which international research suggests results in up to 3 in 5 parents with intellectual disability having their children removed.29 These early intervention and response actions intersect with efforts to address the gendered drivers and reinforcing factors of violence, including women’s financial security and power to make decisions over their own lives, intersecting oppression, and stereotyping.

### Child protection and justice systems as a setting for primary prevention

*Change the story* highlights a number of settings where primary prevention approaches should be tested and implemented but that have not yet received adequate attention and resources. This includes legal and justice sectors, including youth justice, corrections, police, courts and legal services. Families experiencing structural discrimination are more likely to come into contact with child protection and/or justice systems, and there are links between over-policing and experiences of violence. Recommendations from a number of inquiries and Royal Commissions point to how we can harness these settings for the primary prevention of child abuse, neglect, and maltreatment.27,30-32 This includes addressing the structural violence and discrimination that intersects with sexism, particularly racism, ableism, transphobia and homophobia. Addressing oppression directly involves challenging harmful norms and stereotypes that impact on the safety and wellbeing of children, particularly children from communities who are over-represented in the justice and Child Protection systems such as Aboriginal and Torres Strait Islander children, LGBTIQA+ children, children with disability and migrant and refugee children.22-24 Ensuring that the voices of children and young people who have experienced child maltreatment are centred in program design is critical to these efforts. So too is recognising the importance of cycles of recovery and healing in bolstering primary prevention initiatives, which will help families to break intergenerational cycles of violence. It is also crucial to continue work to embed Aboriginal and Torres Strait Islander self-determination within child protection and justice system reform, design and implementation and ensure support for Aboriginal-led prevention programs.

## References

1. Higgins DJ, Hunt G. Child maltreatment: a snapshot summary. Melbourne: Respect Victoria; 2023.
2. Our Watch. Change the story: A shared framework for the primary prevention of violence against women in Australia. 2nd ed. Melbourne: Our Watch; 2021.
3. Our Watch. Changing the picture: a national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children. Melbourne: Our Watch; 2018.
4. Haslam DM, Lawrence DM, Mathews B, Higgins DJ, Hunt A, Scott JG, Dunne MP, Erskine HE, Thomas HJ, Finkelhor D, Pacella R, Meinck F, Malacova E. The Australian Child Maltreatment Study (ACMS), a national survey of the prevalence of child maltreatment and its correlates: methodology. Medical Journal of Australia. 2023;218(S6):S5-S12.
5. Higgins DJ, Mathews B, Pacella R, Scott JG, Finkelhor D, Meinck F, Erskine HE, Thomas HJ, Lawrence DM, Haslam DM, Malacova E, Dunne MP. The prevalence and nature of multi-type child maltreatment in Australia. Med J Aust. 2023;218 Suppl 6:S19-s25.
6. Our Watch & Women with Disabilities Victoria. Changing the landscape. A national resource to prevent violence against women and girls with disabilities. Melbourne: Our Watch; 2022.
7. Higgins DJ, Hunt G. Child, parent, and contextual factors associated with child protection system involvement and child maltreatment in the family: A rapid evidence review. Australian Journal of Social Issues, 147. 2023.
8. Carman M, Fairchild J, Parsons M, Farrugia C, Power J, Bourne A. Pride in Prevention: A guide to primary prevention of family violence experienced by LGBTIQ communities. Melbourne; 2020.
9. Multicultural Centre for Women's Health. Intersectionality Matters: A guide to engaging immigrant and refugee communities to prevent violence against women 2017 [Available from: <https://www.mcwh.com.au/intersectionality-matters-a-new-resource-for-preventing-violence-against-women/>].
10. Commission for Children and Young People. 'Always was, always will be Koori children’: Systemic inquiry into services provided to Aboriginal children and young people in out-of home care in Victoria. Melbourne, Australia: Commission for Children and Young People; 2016.
11. Australian Bureau of Statistics. Personal Safety, Australia, 2016; Statistics for family, domestic, sexual violence, physical assault, partner emotional abuse, child abuse, sexual harassment, stalking and safety. Canberra; 2017.
12. Australian Institute of Criminology. Senate Legal and Constitutional Affairs References Committee – Questions on Notice. 30 September 2022. Canberra: AIC; 2022.
13. McGeough BL, Sterzing PR. A Systematic Review of Family Victimization Experiences Among Sexual Minority Youth. The Journal of Primary Prevention. 2018;39(5):491-528.
14. Prior K, Carvalheiro M, Lawler S, Stapinski LA, Newton NC, Mooney-Somers J, Basto-Pereira M, Barrett E. Early trauma and associations with altruistic attitudes and behaviours among young adults. Child Abuse Negl. 2021;117:105091.
15. Schneeberger AR, Dietl MF, Muenzenmaier KH, Huber CG, Lang UE. Stressful childhood experiences and health outcomes in sexual minority populations: a systematic review. Social Psychiatry and Psychiatric Epidemiology. 2014;49(9):1427-45.
16. Salter M, Woodlock D, Whitten T, Tyler M, Naldrett G, Breckenridge J, Nolan J, Peleg N. Identifying and understanding child sexual offending behaviours and attitudes among Australian men. Sydney, Australia; 2023.
17. David Flynn. Baby Makes 3: Project Report. Box Hill; 2011.
18. Daly A, Stern RT, Leviner P. UN Convention on the Rights of the Child, Article 2 and Discrimination on the Basis of Childhood: The CRC Paradox? Nordic Journal of International Law. 2022;91(3):419-52.
19. Victoria State Government. Victorian Closing the Gap Implementation Plan 2021-2023. Melbourne; 2021.
20. First Peoples - State Relations. Victorian government Aboriginal affairs report 202: Children, family and home. Melbourne; 2021.
21. Urbis, Milward K. Aboriginal family violence evidence review. Melbourne: Respect Victoria; 2023.
22. Jones T. United States of hate: mapping backlash Bills against LGBTIQ+ youth. Sex Education.1-20.
23. Thompson JD. Predatory schools and student non-lives: a discourse analysis of the Safe Schools Coalition Australia controversy. Sex Education. 2019;19(1):41-53.
24. Fairchild J, Carman M, Bersten R, O'Connor B. Pride in Prevention Messaging Guide: A guide for communications and engagement to support primary prevention of family violence experienced by LGBTIQ communities: La Trobe; 2021.
25. Hill AO, Lyons A, Jones J, McGowan I, Carman M, Parsons M, Power J, Bourne A. Writing Themselves In 4: The health and wellbeing of LGBTQA+ Young People in Australia: National report, monograph series number 124. Melbourne: Australian Research Centre in Sex, Health and Society, La Trobe University; 2021.
26. Australian Bureau of Statistics. Childhood abuse Canberra: ABS; 2021-2022 [Available from: <https://www.abs.gov.au/statistics/people/crime-and-justice/childhood-abuse/2021-22>].
27. Commonwealth Government of Australia. Royal Commission into Institutional Responses to Child Sexual Abuse. Canberra, ACT.; 2017.
28. Summers A. The Choice: Violence or poverty. Sydney, Australia: University of Technology, Sydney; 2022.
29. McConnell D. Parents labelled with Intellectual Disability: Position of the IASSID SIRG on Parents and Parenting with Intellectual Disabilities. Journal of Applied Research in Intellectual Disabilities. 2008;21:296-307.
30. Commonwealth Government of Australia. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability: Final Report. Canberra, Ausralia: Commonwealth of Australia; 2023.
31. Yoorrook Justice Commission. Yoorrook for Justice: Report into Victoria’s Child Protection and Criminal Justice Systems. Melbourne, Australia; 2023.
32. Baidawi S, Sheehan R. Cross-over kids: effective responses to children and young people in the youth justice and statutory Child Protection systems: Australian Institute of Criminology; 2019.

## Further reading

All resources from Summarising the evidence can be found on the [project page](https://www.respectvictoria.vic.gov.au/what-we-know-about-drivers-of-violence).

### Research summaries

* Adolescent violence in the home (E Campbell & L Wall)
* Child maltreatment: a snapshot summary (D Higgins & G Hunt)
* Intimate partner violence perpetrated against women by men (Respect Victoria)
* Intimate partner violence perpetrated by women against men (M Salter & D Woodlock)
* Online violence and harassment perpetrated against women (B Harris)
* Non partner sexual violence (A Quadara)
* Sexual harassment occurring in the world of work (S Charlesworth & C Deen)
* Violence perpetrated against older people by another family member or carer (E Stevens, R Kaspiew & R Carson)

### Context briefs

* Summarising the evidence: Exploring what we know about drivers of violence against women, family violence and other forms of gendered violence – Project overview
* Summarising the evidence: Adolescent violence in the home
* Summarising the evidence: Child maltreatment
* Summarising the evidence: Elder abuse
* Summarising the evidence: Online harassment and abuse against women
* Summarising the evidence: Women’s intimate partner violence against men
* Summarising the evidence: Work-related sexual harassment

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Respect Victoria. Summarising the evidence: Child maltreatment. Melbourne: Respect Victoria; 2023.

## Aboriginal flag

## Acknowledgement of Country

Respect Victoria acknowledges Aboriginal peoples throughout Victoria as the First Peoples and Traditional Owners and Custodians of the lands and waterways on which we rely. We proudly acknowledge the Aboriginal communities throughout Victoria and their ongoing strength in practising the world’s oldest living culture.

We acknowledge the significant and ongoing impacts of colonisation and commit to working alongside Aboriginal communities to effect change. We recognise the ongoing leadership role of Aboriginal communities in addressing and preventing family violence and violence against women, and will continue to work in collaboration with First Peoples to eliminate these forms of violence from all communities.

## Victim survivor acknowledgement

Respect Victoria acknowledges the significant impact of family violence and violence against women on individuals, families and communities, and the strength and resilience of the children, young people and adults who have, and are still, experiencing this violence. We pay our respects to those who did not survive, and to their loved ones.

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Respect Victoria is the state’s dedicated organisation for the prevention of family violence and violence against women. Our vision is a Victorian community where all people are safe, equal and respected, and live free from family violence and violence against women.

To achieve our vision, we lead and support evidence-informed primary prevention and act as a catalyst for transformational social change. Primary prevention aims to stop violence from occurring in the first place, by changing the culture that drives it. We drive coordination and effectiveness of the prevention system. We build and promote primary prevention knowledge and evidence. We keep prevention on the public and policy agenda. We guide prevention wherever Victorians live, work, learn and play. We raise awareness that violence against women is preventable and influence community conversations to fuel social change.

We are an independent voice, with functions, powers and duties enshrined in legislation.

1. a The evidence review which informed the summary presented here has been published elsewhere as: Higgins DJ, Hunt G. Child, parent, and contextual factors associated with child protection system involvement and child maltreatment in the family: A rapid evidence review. Australian Journal of Social Issues, 147. 2023 [↑](#footnote-ref-1)
2. b The term child maltreatment is commonly used in academic, legal and practice literature internationally, however definitions vary across different jurisdictions. [↑](#footnote-ref-2)