

The National Office for Child Safety

NationalOfficeForChildSafety@pmc.gov.au

Families Australia and the *Institute of Child Protection Studies* provide the following joint response to the National Strategy Advisory Group Consultation paper.

Families Australia

Families Australia is a national, not-for-profit, peak organisation that strives to improve the wellbeing of Australian families, especially the most vulnerable and marginalised. Our work is organised around three important ideas, namely, that Australia will be a fairer and more equitable and compassionate nation if we better protect and value children, if all families irrespective of their form are strengthened, and if there are genuine and lasting improvements in the wellbeing of Aboriginal and Torres Strait Islander peoples.

As a core aspect of our work, Families Australia convenes the National Coalition on Child Safety and Wellbeing. The National Coalition on Child Safety and Wellbeing comprises some 250 non-government and research organisations including peak bodies, out-of-home care, child and family support, and Aboriginal and Torres Strait Islander organisations who are committed to advancing the national campaign on child safety and wellbeing in Australia.

The Institute of Child Protection Studies

The Institute of Child Protection Studies at the Australian Catholic University (the Institute) seeks to enhance outcomes for children, young people and families through quality research, program evaluation, training and community education, advocacy, and policy development. We are recognised for our expertise in child protection and the prevention of the abuse and neglect of children. We promote children's participation, the strengthening of service systems and practice and support the development of child-safe communities.

Context for Response - Towards A National Approach to Child Safety

Families Australia and the Institute appreciate the opportunity to provide feedback on the proposed model for an Advisory Group to the National Strategy to Prevent and Respond to Child Sexual Abuse and the consultation paper.

The development of the National Strategy to Prevent Child Sexual Abuse is of great importance to Families Australia, the Institute of Child Protection Studies and to the National Coalition for Child Safety and Wellbeing. We note its close alignment with the work undertaken under the *National Framework for Protecting Australia's Children (2009 – 2020)* and proposed for its successor plan *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*.

The Royal Commission into Institutional Responses to Child Sexual Abuse made detailed recommendations¹ as to the development and implementation of this comprehensive national strategy to prevent child sexual abuse. This work has been overseen by the National Office for Child Safety and will now be supported by the newly established National Centre for Action on Child Sexual Abuse. No doubt it will inform and be informed by the work of *Safe and Supported*.

We are hopeful that it will coordinate with measures developed in implementation of the *National Plan to Reduce Violence against Women and their Children 2010-2022* and its successor; and *Australia's Disability Strategy 2021-2031*.

¹ Royal Commission into Institutional Responses to Child Sexual Abuse "Final Report – Preface and Executive Summary" (2017) Australia and particularly recommendations 6.1 to 6.5

We also note the ongoing work in the development and implementation of Child Safe Standards across the country. In order that this work is effective, we believe that the reforms and initiatives should as much as possible be implemented consistently across the nation. The support and leadership of State and Territory Governments will be a critical factor in ensuring the effectiveness of all these initiatives and reform processes.

We note that the Royal Commission also recommended that community awareness and education for children, parents and community members will be critical to increase knowledge and build skills around the prevention of child sexual abuse. Grace Tame has recently reinforced this call with passion in her National Press Club address with Brittany Higgins.

Key Messages

The key messages which we offer and will continue to offer are that:

- The work of creating child safe communities and environments is challenging and requires ongoing and shared commitment. The responsibility for awareness-raising, community education and capacity building should be shared by a broad range of government, statutory agencies, and community organisations.
- Attention should be given to the measurement of the effectiveness of the reforms in preventing child abuse and creating child safe environments.
- We support the development of Child Safe Standards and the National Principles for Child Safe Organisations; and look for an ongoing coordinated national commitment to the implementation of the recommendations of the Royal Commission into Institutional Response to Child Sexual Abuse.

Across the nation, Governments have begun the challenging work of strengthening monitoring and regulation of organisational behaviour and the development of sound preventative practice. This includes the work of creating the culture change necessary to imbed and support respect for children, their experiences and voices and their rights.

Consultation on Proposed Model

The Institute and Families Australia appreciates the opportunity to comment on the proposed model in a relatively tight timeframe and indicate that we would be happy to continue to discuss our comments in greater detail.

Membership and Coordination

We would argue for effective representation on the Advisory Group of all priority groups; along with the necessary infrastructure support to ensure that the representative members (or mechanisms) are able to connect and consult effectively with their respective communities. This support must allow for time and access to required information to allow meaningful engagement and participation for each priority group.

We note that *Safe and Supported* has established an Aboriginal and Torres Strait Islander Leadership Group that has oversight of the development and implementation of *Safe and Supported's* Aboriginal and Torres Strait Islander Action Plan. This approach incorporates direct links to *Closing the Gap* targets and partnership arrangements. Further, the Aboriginal and Torres Strait Islander Leadership Group is one of the four bodies of *Safe and Supported's* multi-party governance arrangements.

We would recommend consultation with this group to ensure coordination between work under *Safe and Supported* and the *National Strategy* for the benefit of Aboriginal and Torres Strait Islander peoples. This includes the necessary mechanisms for measurement and accountability that also align with *Closing the Gap* targets and arrangements.

We anticipate that this would require representation across each Group but more critically there should be the necessary infrastructure support to ensure coordination and effective representation.

Representation

Families Australia has previously advocated for Carers to be included as a critical stakeholder in supporting victims and survivors of child sexual abuse.²

Children and young people should be included as a distinct stakeholder group, but they are also represented in each of the identified priority groups. It will be important to ensure children and young people's voices are capable of being included across stakeholder groups. Too often, only adult voices are present.

Given the importance of the work of State and Territory Governments, there should also be strong mechanisms for representation and coordination to provide for their contributions and engagement.

On a more practical note, many of the professionals who are involved in this work (including those who are members of the National Coalition and its leadership) along with their professional expertise, bring 'lived experience' or support for those with 'lived experience' including as adult survivors. This will be well understood by the National Office of Child Safety (and the National Centre) so the use of good consultative practice and pastoral care will bring its own value.

The composition of the advisory group should balance these requirements.

Role of Representation

There should be clear articulation of the limitations and responsibilities of representation. This could include appropriate tools and documentation around guidelines, principles, and protocols. Stakeholders and their groups will often not be familiar with government and bureaucratic processes. Those with lived experiences from priority groups should be involved and supported to contribute to design, implementation and evaluation of activities and strategy.

As referred to above, Advisory Group members must be supported to undertake consultation whenever possible and appropriate. This can be assisted through the funded work of appropriate support and advocacy groups.

Working Groups and Meetings

We support the strategic use of Working Groups. We would recommend that processes are clear and supported and address issues of remit, timeframe, and support for recording and reporting.

As referred to above, national engagement must be supported. Meeting process must allow for the meaningful engagement and participation of all Advisory Group members. There should be allowance for IT requirements and presentation modes that better support all members to participate (for example, a visual impaired advocate to be provided with a verbal briefing on a visual presentation being made in a virtual meeting).

Term & Engagement

Generally, we support the scope of the term proposed and the use of a public Expression of Interest process. We refer to our previous suggestions for consultation with existing oversight and coordination groups and mechanisms such as the *Safe and Supported* governance mechanisms and the work of the Aboriginal and Torres Strait Islander Leadership Group for *Safe and Supported*.

Data Information and Coordination

Families Australia and the Institute supports ongoing investment and effort to address data gaps across government data and information systems, and data linkage opportunities that could be harnessed to better inform understanding and responses. There are opportunities to existing leverage investments across government system and several national plans and strategies (including the National Framework, National Plan and National Disability Strategy to address these data gaps) that would greatly benefit the National Strategy.

² In 2018-19, there were 67,500 substantiations of child maltreatment for 47,500 children. Ten percent of these substantiations were for sexual abuse. 44,906 children were in out-of-home care on 30 June 2019 with 92% in home-based care (including 39% foster care and 52% relative/kinship care). Australian Institute of Health and Welfare 2020. Child protection Australia 2018-19. Child welfare series no. 72. Cat. no. CWS 74: AIHW.

Data linkages and systems design should be explicitly included in the Terms of Reference as a critical element of building an effective national approach to child safety.

Families Australia and the Institute supports transparency and public reporting as a key requirement for accountability for the implementation of the National Strategy.

Engagement

Policy development, strategy design and systems settings must be informed by the knowledge and lived experience of survivors and victims, and their families and carers and other priority groups.

We support the use of Working Groups to address specific engagement and targeted consultation with priority cohorts, in contributing to monitoring efforts for the National Strategy as a whole.

We note and support the use of innovative consultation mechanisms including a number used by members of the National Coalition. We encourage consideration and consultation with groups such as Health Justice Australia, Children and Young People with Disabilities Australia, Murdoch Children's Research Institute, and others as examples.

We would support consideration of appropriate recognition and financial compensation for the individual time and effort provided by contributors from priority groups.

We recommend that requirements appropriately recognise, compensate and reward the participation of individuals, organisations and other stakeholders with lived experience in the formal engagement and consultations processes of the National Strategy and of the Advisory Group.

Too often, NGOs and those with lived experience are expected to give their time, bring people with lived experience, and share their views without any financial support. Some form of financial support and recognition is critical to authentic engagement and will demonstrate how we value stakeholders as critical partners.

We would welcome the opportunity to discuss the content of our submission in greater detail.

Sincerely,



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CEO

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