

Child Wise Submission in Response to the  
Royal Commission Consultation Paper

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# Best Practice Principles in Responding to Complaints of Child Sexual Abuse in Institutional Contexts

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May 2016



## About Child Wise

Established in 1991, Child Wise is one of Australia's leading not-for-profit child abuse prevention organisations. We work to build awareness, deliver education, and provide the tools to empower individuals and communities around Australia so they can actively prevent child abuse and exploitation. Our programs are child-focused, award-winning and informed by a fundamental belief that children have the right to physical, psychological and emotional safety. The United Nation's 'best interest of the child' principle inspires our approach in all the work we do to prevent child abuse and exploitation.

Child Wise provides a range of prevention services to families, child-focused organisations and the broader community, which include:

- Policy development and Child Safe Organisation Certification
- Comprehensive training programs
- National Child Abuse Helpline
- Child safety advocacy

Child Wise's abuse prevention model is informed by these key elements, and is underpinned by our '12 Standards for a Child Safe Organisation', set out below. We believe these standards create a framework for building open, aware, safe and accountable organisations<sup>1</sup>, and are central to our work with child-focused organisations.

1. In this submission, the term 'organisation' is used to refer to a broad range of child-focused organisations, businesses and institutions which are primarily engaged in providing services, including support, education and leisure activities, to children and young people.



## Executive Summary

Child Wise's submission to the Royal Commission consultation on 'Best Practice Principles in Responding to Complaints of Child Sexual Abuse in Institutional Contexts' is informed by more than two decades of our experience in helping to build child safe organisations and communities. During this period, we have developed an understanding of how organisations can best be supported to progress along the child-safety continuum, including factors which stimulate improvement, and those which present barriers. It is this understanding that shapes our contributions to this consultation.

This submission addresses the three main thematic areas as set out in the Royal Commission consultation paper, which are:

1. Best practice principles
2. Oversight of complaints handling - Reportable conduct schemes
3. Advice and support to institutions

### Best Practice Principles

Child Wise is in broad agreement with the best practice principles set out in the consultation paper, but has raised a number of points for consideration, and translated these into recommendations. In summary, Child Wise recognises that in order to achieve best practice principles, many child-focused institutions<sup>2</sup> will require support to build local expertise and capacity. Non-governmental organisations (NGO's)<sup>3</sup> such as Child Wise, with child safety and capacity-building expertise, could assist significantly in this regard. However, Child Wise believes a rigorous, transparent accreditation process for these NGO's is required. Such an approach would ensure greater consistency, provide an assurance of quality and promote collaboration. A detailed proposal is set out in Appendix 1.

Child Wise is also of the view that children, young people and parents/carers should be involved in the development of child safety policies and procedures; in this way, child-focused institutions can better ensure that their protective processes are understood and utilised by all stakeholders and service users. To quality assure child safety practice, Child Wise has set out an approach which we believe makes sense, and will better ensure child safety policies and procedures are understood, consistently applied and are ultimately effective.

### Oversight of Complaints Handling and Reportable Conduct Schemes

Child Wise has set out its support for a nationally consistent approach to reportable conduct schemes which offers rigorous oversight of child sexual abuse complaints. Capacity building, however, is a concern which has been explored in the submission.

### Advice and Support to Institutions

Child Wise is of the view that significant levels of support will be required by child-focused institutions to ensure they are equipped to deliver best practice. Child Wise has suggested approaches which could assist, including greater input from NGO's with child safety expertise and the development of oversight bodies which have the capacity to support both compliance and improvement, either directly or via commissioned providers



2. In the context of this submission, institution refers to child-focused organisations primarily engaged in the delivery of services to children and young people, across a range of sectors including education, social care and leisure.

3. In this context, non-governmental organisations refers to a number of specialist organisations which are primarily engaged in work with child-focused organisations and institutions to develop child safety expertise and capacity.

## Recommendations

i. Child Wise is broadly supportive of the best practice principles as set out in the consultation paper.

ii. In order to achieve best practice principles, many child-focused institutions will require support to build local expertise and capacity. NGO's such as Child Wise, with child safety and capacity-building expertise, could assist significantly in this regard. Child Wise recommends the implementation of a rigorous, transparent accreditation process for these NGO's to ensure quality and consistency of approach.

iii. It is recommended that high quality professional supervision is highlighted as central to building and sustaining child safe cultures, and is incorporated into best practice principle (1), i.e. [a]n institutional culture that makes decisions based on the best interests of the child and is aware of the inherent vulnerability of children in their care.

iv. Best practice would include policies and procedures that are produced in accessible, child-friendly language. Further, Child Wise believes that it is also best practice to support the active engagement of children, young people and parents/carers in the development of policies and procedures for responding to complaints of child abuse.

v. Consumer engagement should be undertaken to inform the development and implementation of best practice principles. This will create an important level of consumer expectation, as well as a positive peer pressure amongst providers to deliver the safest possible services.

vi. Child Wise is in broad agreement with the proposed elements of a complaint handling policy as set out in the consultation paper.

vii. Guidance for child-focused institutions should be provided which sets out best practice for the management of investigations, particularly in respect of the interface with police investigations.

viii. Any information-sharing guidance or protocols should reflect relevant State/Territory mandatory reporting requirements.

ix. Clear and unequivocal guidance should be provided to child-focused institutions in relation to information-sharing with other non-statutory organisations. This should include the circumstances when information-sharing should be undertaken.

x. Best practice principles should incorporate proactive quality assurance which enables institutions to assess the extent to which policies and procedures are understood and applied by stakeholders. This should include seeking feedback from staff, manager, parents/carers and children.



**xi.** Quality assurance should incorporate periodic analyses of incidences, trends and learning. A systemic approach offers a useful framework for this, as it recognises the multiplicity of factors involved when serious incidents occur.

**xii.** A nationally consistent approach to reportable conduct schemes should be developed, whilst recognising that child-focused institutions are likely to require significant support to build capacity and expertise.

**xiii.** In developing reportable conduct schemes, learning from other schemes - both domestic and overseas - should be sought and applied.

**xiv.** Oversight bodies should be focused on both compliance and practice improvement; this may involve a direct offer of support, or commissioning NGO's to provide support.

**xv.** State/Territory and National governments should clarify the level of capacity building support that will be provided to institutions in order to promote the development of child safety.

**xvi.** State/Territory and National governments should give consideration to developing relationships with registered training institutions and universities to integrate child safety education into relevant courses, e.g. teacher training, early childhood education and counselling.



## Introduction

The Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission), through its consultation paper, *Best Practice Principles in Responding to Complaints of Child Sexual Abuse in Institutional Contexts* (March 2016), has sought submissions on three key matters:

1. Best practice principles
2. Oversight of complaints handling - Reportable conduct schemes
3. Advice and support to institutions



Child Wise welcomes the opportunity to contribute to this important consultation, and has prepared this submission accordingly. This submission responds to the three key themes noted above, and is informed by our extensive experience of supporting a broad range of child-focused organisations to progress along the child safety continuum. Child Wise recognises the complexities involved in establishing a robust, nationally consistent, child-focused system of responding to complaints of child sexual abuse, and that doing so relies on a broad range of contributory voices. Child Wise offers this submission in the spirit of collaboration with the many other stakeholders who will undoubtedly contribute to the development of these best practice principles.

## Section 1 - Best Practice Principles

Child Wise is in broad agreement with the best practice principles set out in the consultation paper, however, would like to comment on some key underlying complexities, and add some context which the Royal Commission may wish to consider.

### **a) An institutional culture that makes decisions based on the best interests of the child and is aware of the inherent vulnerability of children in their care.**

An open and aware culture is undoubtedly the foundation of best practice in respect of dealing robustly, sensitively and effectively with disclosures and allegations; indeed, this is a broadly supported principle (Beyer, Higgins and Broomfield, 2005). It is also one of the most challenging to implement and complex to measure. In supporting child-focused organisations to develop child safe cultures, the starting point is leadership, including boards of directors and strategic managers. Any best practice principles must stress the significance of leadership accountability (Moore Legal, 2016); to ensure accountability leaders must create structures and systems that mean they know about concerns contemporaneously, maintain oversight and foster a culture which treats complaints of abuse with the utmost seriousness. Institutions will be at different stages along the child safety continuum, and for many, capacity building will be key. To ensure leaders are equipped to build open and aware organisational cultures, we would suggest that traditional leadership 'training' is not sufficient. Rather, leadership engagement and development which focuses on continuous improvement, challenge and quality assurance should be the standard benchmark. Connected to this, Child Wise strongly believes that effective supervision arrangements at all levels of the organisation are key to building and sustaining child safe cultures..

Child Wise is actively involved in this sort of leadership engagement and development and would want to see institutions make use of this approach to build capacity and expertise. Institutions, however, need access to a menu of accredited, quality assured providers upon whom they can rely to deliver learning experiences – both operational and strategic – which meaningfully assist them to capacity build. This theme of capacity building and access to quality child safe expertise will arise multiple times throughout this submission; to advance the discussion, Child Wise has prepared an appendix to this submission which sets out a model whereby NGO's focused on the improvement of child safe practice can be quality assured and accredited, and reliably used to support organisational development and capacity building. This is attached as Appendix 1.

### **b) A Child-Focused Complaint Handling Policy that is Clear and Accessible**

The suggested topics of a complaint handling policy, as set out in the consultation document, are comprehensive and Child Wise would support their adoption. Child Wise would, however, like to expand on the issue of empowerment and participation

When considering policy development and implementation, it is important to reflect on victims' feedback to the Royal Commission, i.e. that they often did not disclose concerns due to a lack of trust in the complaints process. The consultation paper rightly calls for complaints processes which are 'accessible, independent, responsive





and respectful'. Child Wise fully supports that best practice should involve assurances that policies, procedures and relevant guidance will be produced in accessible, child-friendly language which considers the needs of culturally and linguistically diverse communities and children with disabilities. Furthermore, a method of better achieving this involves the meaningful engagement of children, young people and parents/carers in the development of policies and procedures (Department for Education and Child Development, South Australia, 2015). The Royal Commission has included children's empowerment and participation as one of its nine elements which contribute to a child safe organisation; this has also been a Child Wise standard for some time. Whilst challenging, active engagement of service users in policy and procedural development better assures a product that make sense for its beneficiaries.

Child Wise would like to emphasise the importance of consumer engagement, as the Royal Commission considers best practice principles for complaints handling. Child Wise works extensively with parents/carers and as part of this, aims to raise their awareness to the features of organisations which indicate they are child-safer, such as the consistent application of child-focused polices and procedures. As we collectively work to ensure all child-focused organisations adopt best practice principles, the power of parents/carers as consumers of services cannot be under-estimated. Once parents/carers are clear about the hallmarks of a safe organisation, their awareness can help bring about a positive peer pressure amongst organisations who will want to strive to meet their expectations.

### **c) Protocols for Managing Relationships and Sharing Information with Other Agencies**

Child Wise welcomes the inclusion of this best practice principle, in particular the narrative around interface with police. It is critical to recognise that some of the institutions which will be applying these principles have limited expertise of child protection. Interface with statutory bodies, such as police and child protection services, in relation to investigations can raise anxiety, confusion and in some instances inertia, i.e. a perception that police or another statutory body will deal with issues, resulting in organisational inaction (Davies and Duckett, 2008). As such, clear guidance in relation to information sharing and the sequencing of investigations is key, and should be included in any complaints handling procedure, underpinned by robust guidance from relevant statutory bodies. Child Wise would also like to highlight the importance of relevant State/Territory mandatory reporting requirements being reflected in information sharing protocols.

The issue of information sharing with other non-statutory bodies will be considered further in section 2 of this submission, i.e. in respect of Reportable Conduct Schemes. However, it is applicable at this point to note that Child Wise is of the view that any complaints handling procedure must include guidance as to the circumstances when information can and should be shared with other non-statutory organisations in the interest of promoting child safety. This may, for example, occur where an institution conducts an investigation into child grooming, but no police action is taken. Where well-founded concerns have arisen from comprehensive, principled investigations, institutions would benefit from clear and empowering guidance which sets out how this information can be communicated to potential future employers and/or other relevant organisations, in order to prevent child abuse from occurring elsewhere.

In its consultation paper, the Royal Commission notes that, 'jurisdictions have legislation that authorises the exchange of information between certain agencies and individuals'. Whilst Child Wise supports this position, we would also suggest that this is an area where institutions are likely to hesitate and potentially falter due to fear of legal repercussions. Child Wise suggests that clear and unequivocal messages from government as to information-sharing responsibilities and protections, would be of assistance as institutions implement this critical element of policy and procedure.

#### **d) Training is Provided about the Complaint Handling Process**

Child Wise is supportive of this best practice principle, and would echo the comments made in point 1a of this submission, regarding the importance of quality assured, accredited programs which contribute to capacity building. We would draw attention again to Appendix 1. In devising and implementing complaints handling policies and procedures, institutions would benefit from a quality assured framework of providers which could support capacity building.

Child Wise would also recommend that professional child safety awareness is developed at the earliest possible stages when formal education and training is undertaken. As such, Child Wise recommends that State/Territory and National governments consider engaging with registered training organisations and universities in order to ensure child safety awareness training is built into relevant courses, such as teaching, early childhood education and counselling.

#### **e) An Ongoing Audit Process is in Place**

Child Wise wholeheartedly supports the inclusion of a principle related to audit. In our work with child-focused organisations, quality assuring the effectiveness of policy and procedure is often one of the most significant challenges for leaders. Reactive process audits are one tool that would enable leaders to ensure compliance with policy and procedures. However, in our work with organisations, we have found that proactive quality assurance which engages key stakeholders, including staff, managers and service users, is an effective tool to test whether policies and procedures are understood to the extent that they would be effectively utilised should concerns arise. Reflecting on the research of Sullivan and Beech (2004), which highlights the reality that professionals in institutions often do not respond robustly to signs of child abuse, it is all the more critical to have sound quality assurance systems in place. To achieve this, we employ simple tools such as questionnaires, surveys or interviews to ensure there is synergy between written policy, operational and service user understanding, and practical application. Whilst recognising the resource implications of such an approach, we believe it provides important checks and balances, and would welcome its inclusion in best practice guidance.



## Case study - Importance of proactive quality assurance which engages stakeholders



Child Wise was recently commissioned to deliver child safety awareness training to professionals who work with children. The managers who commissioned the training were confident in the quality of their team's work with children and thought highly of their knowledge of child development and child safety. Management were particularly confident as they had recently reviewed their child safety policies and procedures and had undertaken a recent communications exercise to share this with all staff via email. They believed the child safety awareness training was a helpful process, but would likely be a refresher for most staff. During the program, trainers spent time talking with staff about their awareness of the organisation's child safety approach, including policies and procedures. To the surprise of management, no member of staff was able to describe relevant policies and procedures. So what might have gone wrong here? Firstly, child safety communication needs to be more than a single event, but must be part of regular dialogue, and built into the 'DNA' of the organisation. Furthermore, it must be underpinned by regular supervision to ensure staff have the opportunity to ask questions and test out practical application. Lastly, organisations should proactively quality assure the extent to which policies and procedures are actually understood and applied by staff.

Child Wise is of the view that an effective quality assurance process would also involve 'root and branch' reviews of complaints, as well as longitudinal analyses, including trends, learning and the application of that learning. Indeed such analyses can support the development of strategies which prevent future incidents from occurring. Child Wise supports a systemic approach to learning reviews which recognises the many complexities and facets of organisations and how each works – or in some instances, does not work – together to deliver outcomes. Such an approach recognises that failures are rarely the sole responsibility of an individual, but rather the result of systems and cultures. An approach that recognises the complexities of systemic failures, whilst complex and confronting, also brings with it the potential for sustained systemic improvement (SCIE, 2012).

## Section 2 - Oversight of Complaints Handling – Reportable Conduct Schemes

Currently only one state in Australia – New South Wales – operates a reportable conduct scheme which oversees complaints of abuse, investigations and resulting outcomes. Child Wise notes that other States and Territories are considering or in the advanced stages of implementing similar schemes. Child Wise fully endorses the implementation of reportable conduct schemes, as they provide important opportunities to monitor complaints of abuse, oversee the quality of investigations, analyse trends and outcomes, and gather intelligence about perpetrators, particularly those who frequently move between organisations. Child Wise wishes, however, to raise several points of consideration in respect to the oversight of complaints handling.

- a) Capacity building and the development of organisational expertise in conducting investigations is key. NGO's such as Child Wise could play an important role in supporting this, but again external scrutiny and accreditation of these organisations and their products would be imperative. In our experience, child-focused institutions would welcome the rigor that a reportable conduct scheme provides however would, to varying degrees, require support to ensure they have the internal policies, procedures and skills to be fully compliant.
- b) Child Wise also recognises the significant resource investment for the Commonwealth, States and Territories in implementing reportable conduct schemes. Institutions may understandably be concerned with the capacity of oversight bodies to effectively oversee such schemes and engage with reporting organisations. Comprehensive community consultations will be key in setting out the design of reportable conduct schemes, seeking stakeholder input, and addressing concerns around capacity.
- c) Given that only one State currently operates a reportable conduct scheme, there is an opportunity to achieve some national consistency in how other schemes are implemented. Whilst this is a complex undertaking, it would also serve as a crucial safeguard which could facilitate better inter-state communication, particularly where perpetrator mobility is a factor. Furthermore, given that many stakeholder institutions will have national remits, a nationally consistent approach will ease implementation and operational burdens, and better enable compliance. A nationally consistent approach may not necessarily require the same legislation, but rather key, consistent over-arching principles which guide thresholds, processes and information sharing.
- d) Implementing reportable conduct schemes which are potentially nationally consistent, brings about significant opportunities to re-think the approach to best practice, and how such approaches could build capacity. Child Wise recommends the examination of international models of reportable conduct schemes, and how elements of these might be utilised to improve practice in Australia.



## Case study - Best Practice for a Reportable Conduct Scheme

England has operated a reportable conduct scheme for several years. This scheme requires local council child protection services to have an officer, or team of officers, which receive referrals from employers<sup>4</sup> about allegations made against professionals who work with children (Department for Education, 2015). These designated officers provide threshold advice, offer guidance on the effective planning of investigations and support liaison with police. Where concerns are of a significant nature, e.g. where a crime is likely to have been committed, designated officers will convene strategy meetings, or joint discussions, which include the referring organisation, police and any other relevant organisations. Such meetings/discussions are a matter of procedure and embedded into the way in which allegations are managed. A key benefit of the approach is that enquiries are jointly planned, and organisations which may not have local expertise in managing investigations are supported by a multi-agency network. In this way, expertise and capacity are built. This is just one example of a reportable conduct scheme; there are others, including the NSW model, which could be examined to ensure the development of best practice models in other States/Territories.



4. The term employer refers to an organisation which directly employs staff and/or engages volunteers or contractors in the delivery of services to children and people.

## Section 3 - Advice and Support to Institutions

Throughout this submission, reference has been made to some institutions which may be at an earlier stage of child safety maturity, or perhaps have lacked the capacity and resources to build local expertise. Child Wise would agree that there is a need to think carefully about how robust, high quality advice and support is provided to these and other child-focused institutions (Goddard, Saunders, Stanley & Tucci, 2002). Some considerations are set out below.

- a) Reference has already been made in section 2 to a reportable conduct scheme in England which involves designated officers who hold a statutory role in supporting the management of allegations against professionals. This scheme builds capacity through access to experts who advise on threshold and investigation planning, whilst facilitating effective multi-agency working. It is recognised that there are resource implications, and that implementation of such an approach would require buy-in from a range of stakeholders, including child protection services, police and other child-focused institutions. There is, however, merit in considering this and any other approaches that may contribute to the development of best practice principles.
- b) As stated in section 2, Child Wise is of the view that an oversight body is required in respect of child sexual abuse complaints. This may take the form of State/Territory bodies with over-arching nationally consistent principles, or a single national body. It is also recognised that oversight functions may be built into existing organisations, such as Commissions for Children and Young People, as is proposed in Victoria. Whatever form the oversight body takes, it is Child Wise's view that there should be sufficient capacity to enable it to monitor compliance, whilst supporting practice improvement; the latter could be undertaken directly by the oversight body, or may well involve engaging third party providers, such as NGO's with child safety expertise, to undertake improvement work with child-focused institutions.
- c) As stated previously, Child Wise is of the view that NGO's with expertise in child safety could be utilised to support capacity building and develop institutional expertise. A detailed proposal is set out in Appendix 1.

## Conclusion

Child Wise would like to thank the Royal Commission for the opportunity to contribute to this important consultation. We recognise the complexities of this undertaking, and value the consultative approach. As this endeavour continues, Child Wise would welcome the opportunity to contribute further to the development of best practice principles in responding to complaints of child sexual abuse in institutional contexts.



# Appedix 1 - Child Safety Capacity Building – A Quality Assurance Model

## 1. Purpose

- To provide a synopsis of the current approaches to child safety capacity building<sup>5</sup>;
- To highlight the issues and risks – current and emerging – associated with the approaches;
- To propose alternatives with contribute to organisational capacity building, and better position child-focused organisations to deliver the best practice principles as set out in the consultation paper.



## 2. Background

Non-Governmental Organisations (NGO's) have an important contribution to make in supporting child-focused organisations<sup>6</sup> to build sustainable child safety capacity. This is undertaken using a range of products including training, leadership development and child safety accreditation<sup>7</sup>. In respect of the latter, over the past decade, a number of NGO's have developed their own set of proprietary child safe standards and models of accreditation for organisations that enhance the safety and wellbeing of children in their care; participation is voluntarily.

The increased focus on child safe standards resulting from the Royal Commission into Institutional Responses to Child Sexual Abuse and growing State/Territory legislative requirements, combined with low barriers to entry, has seen new entrants joining the fee-for-service child safety capacity building market, each with their own approaches and proprietary standards. Whilst this brings with it considerable opportunities for creativity and flexibility, there is a lack of transparent, consistent quality markers which organisations could use to guide them when they commission capacity building support. Increasing expectations on organisations to build child safety expertise means that they are more readily seeking external input; as such, it is timely for stakeholders<sup>8</sup> to reflect on how existing and emerging approaches to child safety capacity building can be improved to ensure child-focused organisations have access to a quality assured framework of providers that can assist them to become 'child safer'.

5. Capacity building includes the full range of activities that support child-focused organisations to improve their child safety mechanisms and expertise, including training, consultation, coaching, policy reviews, as well as comprehensive accreditation.

6. The term "organisations" is a generic term which covers all relevant organisations across government funded and non-government funded organisations.

7. Child safety accreditation is used to refer to activity undertaken by a range of organisations to assess child safety practice against a set of standards.

8. This includes the full range of stakeholders; government, peak bodies, child-focused organisations, NGO's engaged in child safety training and accreditation, as well as service users.

### 3. Findings

#### 3.1 Current approaches to supporting child safety capacity building:

- Various NGOs have developed their own proprietary set of child safe standards and methods of assessing and accrediting an organisation's compliance to those standards.
- A broad range of child safety training programs and approaches exist and continue to be developed.
- No regulation or minimum standards exist for organisations developing and delivering child safety training or organisational accreditation.
- The delivery of child safe organisation accreditation is typically delivered via a fee-for-service model.
- Participation by organisations undertaking accreditation is voluntary.
- More comprehensive approaches to accreditation extend beyond mere child safety policy and procedure. Whilst there is, of course, a focus on policy and procedures, progressive approaches involve: leadership development; extensive organisational needs assessment; stakeholder engagement to assess the extent to which an open and aware culture exists throughout the organisation; and an in-built approach to monitoring continued adherence to accreditation standards.
- There is no formal, independent evaluation of the proprietary standards, accreditation models or training programs developed by NGO's.
- Each NGO's proprietary standards and approaches are different, resulting in the existence of various standards and models.
- The voluntary nature of undertaking such accreditation programs results in systemically low levels of participation.
- The cost of accreditation is prohibitive to many organisations that may be willing to undertake a child safe standards accreditation.

#### 3.2 Issues related to current approaches:

- Any individual or organisation can develop a set of child safe standards, accreditation model and training programs, and commence commercialising the delivery, without the need to meet or maintain any minimum requirements.
- Given each organisation rightly believes their approach represents best practice, the models of delivery have become the basis of differentiation and competition.
- There is generally a low rate of systemic participation, which results in low systemic uplift in child safety standards.



## 4. Opportunities

### 4.1 The opportunities that exist are:

- The development of an agreed set of nationally recognised child safe standards ;
- The development of a child safety accreditation model that enables greater participation of organisations which have direct and regular contact with children;
- The development of a governance framework which ensures that the requisite experience, capability and capacity reside within the NGO's undertaking accreditation, training and other child safety capacity building activities.

### 4.2 An alternative model for consideration:

An alternative model with the following attributes will eliminate and/or mitigate many of the current and emerging issues and risks. Such a model also has the potential to increase systemic participation rates whilst enhancing the value of accreditation.

- An agreed set of child safe standards for organisations.
- An agreed set of sector-based criteria which sits under the overarching child safe standards for organisations.
- An agreed set of quality standards which must be met by any individual or organisation wishing to undertake child safety accreditation. It is suggested that in this context, 'accreditation' refers to a best practice approach which should include (but not be limited to): leadership development; organisational needs assessment, including the review of policy and procedure; stakeholder engagement; and an approach to periodically assessing long-term adherence to standards.
- An agreed set of standards for child safety training, which specifies minimum requirements whilst being sufficiently flexible so as to not limit creativity and adaptability.
- A transparent framework of quality assured provides which organisations can draw from to support capacity building.
- The establishment of a reference group with responsibility for developing and monitoring quality standards for child safety capacity building activities. The reference group would comprise a range of sector experts and ensure that standards and sector criteria remain current, evidence-based and reflective of global best practice.



## 5. Options

### Option 1: Do nothing:

Under this scenario, a fragmented, unregulated approach to child safe standards and capacity building would continue. Many willing organisations would be excluded due to the high cost of undertaking accreditation. Organisations would also lack an assurance that the products they are commissioning are of sufficient quality.

### Option 2: Agreed child safe standards introduced with no sector criteria, reference group or accreditation governance framework:

Whilst a step in the right direction, under this scenario many of the fundamental issues and risks associated with current approaches remain. This option does not offer collaborative opportunities for government and sector experts to develop quality standards for child safety capacity building activities. With no governance framework in place, the fee-for-service market will remain unregulated, and organisations seeking to commission capacity building support will not have assurances of quality. Without sector criteria, the overarching standards may not be as relevant; this could open up the possibility of NGO's competing on standards, as they may develop more relevant criteria for certain sectors. An example of this includes the out-of-home care sector where standards relating to 'children displaying sexually concerning behaviour' are of particular relevance.

### Option 3: Agreed child safe standards, with sector criteria supported, by the establishment of a reference group and governance framework (preferred option):

This scenario promotes collaboration between sector experts and government, to develop a transparent set of quality markers for child safety capacity building activities. The approach would be to facilitate consistency, promote quality, whilst not stifling creativity and value-based competition. The aim would be to ensure child-focused organisations have access to a range of quality assured providers to support their capacity building goals. Ultimately, this approach would enable child safety capacity building that is accessible, sustainable and reflective of best practice principles as set out in the consultation paper.

## 6. Recommendation

The recommendation of this paper is to progress with option 3; developing an agreed set of child safe standards with sector-based criteria; the development of quality standards which NGO's providing capacity building services would be required to meet; the implementation of a governance framework to ensure the quality of child safety capacity building activity; the establishment of an appropriately constituted reference group, comprising government and sector experts, to oversee this framework.

It is also recommended that the approach to developing these elements be a collaborative process involving government bodies and relevant representatives from the NGO sector.

It is further recommended that the process be a consultative one with appropriate representatives from the various sectors defined as systemically important when undertaking the development of sector-based criteria.



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