

The Benevolent Society  
Submission on the Fourth Action Plan for the  
National Framework for Protecting Australia's  
Children

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## 1. Introduction

The Benevolent Society welcomes the opportunity to comment on the proposed focus and scope of the Fourth Action Plan of the *National Framework for Protecting Australia’s Children* (National Framework). We strongly support the Australian Government’s leadership in ensuring the wellbeing and safety of children and their families. This national approach and effective collaboration between the commonwealth, states and territories is essential in order to prevent child maltreatment within Australia.

The National Framework is an ambitious plan that seeks to drive a public health model approach to child wellbeing and safety. The Benevolent Society is concerned that the rigour and ambition of the National Framework is not reflected in the Actions Plans and that state and federal governments have not sufficiently prioritised the work required to deliver on the intent of the National Framework.

The Benevolent Society believes that the weakening of governance structures established to deliver the National Framework over the past ten years has compromised efforts to achieve outcomes. The disbanding of the Standing Council on Community and Disability Services (SCCDS) and its advisory councils has undermined accountability and oversight. The lack of consistency in government representation on working groups and lack of authority of personnel to drive the required change has compromised implementation. The Fourth Action Plan and discussion of the future of the National Framework beyond 2020 must address these issues of governance and oversight.

The rising numbers of children receiving child protection services across every jurisdiction in Australia suggests the current policy and funding efforts are insufficient to bring about the desired change. If Australian governments are committed to achieving the outcomes of the National Framework they must prioritise the delivery of the National Framework’s strategies. This requires increased investment and improved efforts to measure progress against the National Framework’s indicators of change.

When launched the National Framework for Protecting Australia’s Children was a landmark in child wellbeing and safety policy. The strategies offer significant opportunities to drive better outcomes for children and their families through a much needed nationally coordinated approach, however the lack of political prioritisation and funding has resulted in less than desired outcomes. Looking forward there remains a fundamental need for the states, territories and Commonwealth governments to work together so that the vision for child wellbeing and safety laid out in the National Framework can be achieved.

Given the importance and scope of the National Framework for Protecting Australia’s Children, The Benevolent Society is dismayed by the short timeframe provided and limited promotion of this Discussion Paper. Whilst we recognise that the proposals outlined in the Discussion Paper have been informed by input from the National Forum and consultations facilitated by Families Australia, we are concerned that many across the sector have either not known about or had sufficient opportunity to respond to this Discussion Paper. We note that short timeframes are particularly disadvantageous for Aboriginal and Torres Strait Islander organisations whose input on each of the priority areas is essential.

Recognising that this Fourth Action Plan will be the last to deliver on the National Framework, The Benevolent Society is ready to be an active partner in discussions that look beyond 2020. We strongly support the public health model approach as the appropriate policy response and will seek to ensure greater accountability in delivering systems that improve child wellbeing and safety.

## 2. The Benevolent Society

The Benevolent Society is Australia’s first charity. We have helped people, families and communities achieve positive change for 200 years. We are a secular not-for-profit organisation with 1,615 staff and 658 volunteers. In 2016-2017, we supported more than 54,000 children and adults in 71 locations across New South Wales and Queensland. Our revenue in 2016-17 was \$ 108,454 million.

The Benevolent Society offers a range of services to families to help them thrive. These include parenting support and coaching, early childhood development programs, and specialist support when challenges arise. We provide services to vulnerable families where children have been identified as at-risk, including Brighter Futures, Fostering Young Lives, Headspace, Resilient Families, Communities for Kids, Family Mental Health Support Services, Family Preservation and Intervention Programs and Family and Child Connect. We also have provided post-adoption services for over 26 years.

The Benevolent Society advocates that all Australian child protection systems adhere to and support the internationally recognised principles and obligations outlined in the *United Nations Convention of the Rights of the Child* and the *United Nations Declaration on the Rights of Indigenous People*.

## 3. Discussion

### Contextual Factors

#### Discussion questions:

**How can we best reflect the recommendations of the Royal Commissions and the possible government responses in the Fourth Action Plan?**

*The Royal Commission into Institutional Responses to Child Sexual Abuse*

- The Royal Commission into Institutional Responses to Child Sexual Abuse (Child Sexual Abuse Royal Commission) focused on one form of child maltreatment and investigated that form of maltreatment solely in institutional settings. This narrow focus must be recognised when reflecting the recommendations of the Child Sexual Abuse Royal Commission in the Fourth Action Plan. Specifically, the focus of the Fourth Action Plan must not prioritise safety at the expense of wellbeing. The concept of “child wellbeing” provides a more holistic means of addressing the causes and consequences of child maltreatment, which includes considerations of safety. Child wellbeing must remain the primary focus of the National Framework.
- The Benevolent Society is concerned that the Child Sexual Abuse Royal Commission’s recommendation to replace the National Framework with a National Framework for Child Safety would preclude a focus on child wellbeing in its entirety.
- The Benevolent Society supports the Child Sexual Abuse Royal Commission’s recommendation that a National Office be established in the Department of Prime Minister and Cabinet, noting that this ought to be a National Office for Child Wellbeing and Safety. This National Office should lead the policy response beyond 2020. We note however the extensive implementation issues that occurred when Indigenous Affairs transitioned to Prime Minister and Cabinet, specifically: a loss of content knowledge, breakdown of relationships and loss of corporate

memory, which limited the efficacy of consultations with key stakeholders. We therefore recommend caution and review of processes to safeguard against these issues.

#### *The Royal Commission into the Protection and Detention of Children in the Northern Territory*

- The Benevolent Society supports the recommendation from the Royal Commission into the Protection and Detention of Children in the Northern Territory (the NT Royal Commission) calling for:
  - a representative council of children who are or have been in out-of-home-care and who have been in the youth justice system including in youth detention to express their views on the development and implementation of laws and policies which affect children and young people and that this be located in and supported by the Children’s Commissioner. We believe there is value discussing this recommendation with a view to implementing it nationally. This recommendation ought to be considered in light of the Fourth Action Plan Discussion Guide question relating to ensuring concerns of young people inform the work of the Fourth Action Plan.
  - greater coordination and early intervention, notably improving access to high quality education for children in remote communities, especially secondary students and placed based approaches in partnership with local communities. Such recommendations are consistent with the intent of Priority Area 2.
  - standardised screening of children entering OOHC screening for FASD and improve access for children and young people in out of home care to effective rehabilitation and counselling services including the prevention and treatment of substance abuse. To the extent that these children are Aboriginal or Torres Strait Islander children this is consistent with Priority Area 1, however we are concerned that the Fourth Action Plan does not include a Priority Area that addresses the care of children who have been removed from their families except in relation to permanency. We recommend that Priority Area 3 be re-drafted to include a focus of outcomes for children in out-of-home care that is broader than the permanency agenda.
  - timely and quality plans to be developed and implemented for every child in care, that they include cultural plans specific to each child, that care plans be provided to parents in clear and understandable language with an interpreter if necessary, that plans outline what is required for reunification and that a court may not issue a protection order unless satisfied that the Chief Executive Officer has developed, approved and filed with the court a care plan that meets the needs and best interests of the child. We recommend a proposed key action in a newly drafted Priority Area 3 that seeks to implement this recommendation nationally.
  - data collection on reunifications including the number of children and young people successfully and unsuccessfully reunified with families, the duration of their period in out of home care and the systemic impediments to reunification. This recommendation is consistent with the Key Actions in Priority Area 3 seeking to establish indicators for permanency.
  - all young people leaving care to have leaving care plans, provision of information regarding available supports up to the age of 25 and six monthly contact up to the age of 21 providing updates on available support and how to access the support. The Benevolent Society believes there is value in considering leaving care support as a prevention strategy.

#### **Are there any particular lessons learnt from the Third Action Plan that you would like to highlight in the Fourth Action Plan? What do we need to do differently?**

- The Benevolent Society is concerned by the lack of publically available annual reports documenting progress under the Third Action Plan. The lack of annual reports published since

the 2013-14 Annual Report makes it difficult to evaluate the effectiveness of activities conducted under the Third Action Plan.

- This lack of transparency diminishes the efficacy of the planning cycle and raises questions about the extent to which the Action Plans contribute meaningfully to achieving the goal of the National Framework. The Benevolent Society recommends that regular annual reports on the National Framework’s indicators are publically delivered by the Community Services Ministers.
- The Benevolent Society believes that the effectiveness of the National Framework’s tripartite structure during the delivery of the Third Action Plan has been undermined by a lack of prioritisation and commitment from Commonwealth and state and territory governments. The lack of consistency in government representation on working groups and the lack of authority given to government personnel to drive activities has compromised the Third Action Plan’s implementation. Greater efforts from the Commonwealth and state and territory governments, led by the Community Services Ministers, is required to ensure the success of the National Framework’s tripartite governance arrangements.
- Ongoing jurisdictional legislative barriers, inconsistent definitions and disparities in data collection systems have hampered the ability of the Commonwealth and state and territory government to coordinate and work collaboratively toward the objectives outlined in the Third Action Plan. The Benevolent Society supports a process for legislative reform that would see a national approach to delivering on child wellbeing and safety that would remove these barriers.
- The Benevolent Society believes there is sufficient evidence supporting the efficacy of place based early intervention initiatives to move beyond trials and proof of concept projects. The Fourth Action Plan, being the final plan for this National Framework needs to deliver on the ambition of the national framework. To that end, states, territories and the commonwealth should be seeking to invest in delivering the effective programs at scale.

#### **What can we do differently to better meet the needs of Aboriginal and Torres Strait Islander children and families?**

- In relation to issues that involve Aboriginal and Torres Strait Islander people, The Benevolent Society follows the evidence and the advice of Aboriginal and Torres Strait Islander people and organisations.
- We defer to the expertise of Aboriginal and Torres Strait Islander peak bodies on issues relating to Aboriginal and Torres Strait Islander children, notably SNAICC as the national peak body for Aboriginal and Torres Strait Islander children.

#### **What needs to occur over the next two or three years to prepare us for the next phase of work beyond 2020?**

- A final evaluation of the National Framework is required, building on the lessons learnt from the 2015 evaluation ‘Measuring Progress Against the National Framework’.
- Commonwealth and state and territory governments must recommit to working jointly to deliver coordinated systems that support better outcomes for children and their families. This recommitment must include a greater investment in child wellbeing.
- Key stakeholders, including but not limited to: children and young people, families and carers, sector peaks and service delivery organisations, must be provided with ample opportunity to shape the decision on what type of policy mechanism replaces the National Framework from 2020.
- The Benevolent Society supports further discussion about the policy mechanism that replaces the National Framework 2009 - 2020 and believes this should include as options for consideration a National Plan for Children and a renewed National Framework.

- The Benevolent Society strongly recommends that the policy mechanism that replaces the National Framework is focused on a holistic set of child wellbeing domains that go beyond a focus on safety and drives system reform required to improve child wellbeing.
- Noting the ongoing jurisdictional challenges, The Benevolent Society supports consideration of a legislative reform process to enable a truly national approach to child wellbeing and safety which is not limited to the tertiary system but which prioritises early intervention, the support of families and outcomes for children.

#### **What can the National Forum and the Children and Family Secretaries (CaFS) do to increase awareness of the Fourth Action Plan and the National Framework?**

- CaFS could substantially increase their internal advocacy role within government to champion child wellbeing as a priority political issue and encourage Commonwealth and state and territory ministers and premiers to increase support for the work of the National Framework.
- CaFS could champion the use of annual reports throughout the duration of the Fourth Action Plan as an awareness-raising tool directed at government and the general public.
- Non-government organisations (NGOs), academics and peak body representatives of the National Forum could increase efforts to keep the sector informed of the work being undertaken and establish more robust consultation processes.
- Stakeholders in and beyond the National Forum should drive a public conversation with key influencers and the public more broadly to increase knowledge of and engagement with this critical policy area.

#### **How can we best utilise the expertise of the non-government and research sectors in work under the National Framework and how could this be facilitated through the National Forum?**

- Greater openness and information about the work of the National Forum and the working groups would support engagement by the non-government and research sectors.
- A structured process for regular and more effective consultation on the implementation of the National Framework, including support for the sector to engage in policy discussions, would improve utilisation of this expertise.
- Experience could be further utilised through encouragement of partnerships between non-government organisations and research bodies through the establishment of a funding pool available for that purpose.

#### **What should the National Forum’s role be under the Fourth Action Plan and beyond 2020?**

- The Benevolent Society believes that the tripartite policy advisory structure of the National Forum is a sound and robust mechanism for overseeing the delivery of the National Framework and the Fourth Action Plan.
- However, we believe that the National Forum must show greater ambition in terms of the scale and scope of initiatives in the Fourth Action Plan and greater commitment to realising the aspirations outlined in the National Framework.
- The Benevolent Society would welcome greater transparency and visibility of the work undertaken by the National Forum (in terms of agendas, results, discussions and future planning), greater consultation with the NGO sector, and term limits for National Forum personnel to ensure a diversity of opinions and voices around the table.
- The National Forum’s role should include:
  - leading activities to implement the strategies of the National Framework’s Fourth Action plan

- coordinating opportunities for NGOs and research bodies to provide expertise and practical advice on the implementation of Fourth Action Plan
- communicating with stakeholders to keep NGOs and peak bodies informed of the National Forum and working groups’ activities and progress
- assisting governments to identify and remove blockers to reform
- reporting on progress against the National Framework
- facilitating discussion on the development of the next policy mechanism to follow the National Framework.

**How will work continuing from the Third Action Plan be reviewed under the Fourth Action Plan if the strategy working groups cease? Should the cessation of working groups be gradual?**

- The Benevolent Society is concerned by the proposed cessation of the working groups as it implies a failure of a key structure created for delivering the objectives of the action plans. This raises questions as to whether the Commonwealth and state and territory governments have adequately supported this governance structure to succeed.
- Should the working group structure not be fit for purpose for implementing the strategies of the Fourth Action Plan, then the reasons for this must be communicated to the broader NGO and research sector.
- If the working groups are to cease, then a consultation with the NGO sector should be conducted to decide on the mechanism to replace them.

**How can we best utilise the expertise of the Aboriginal and Torres Strait Islander Working Group?**

- Aboriginal and Torres Strait Islander people need to be considered as the experts in relation to Aboriginal and Torres Strait Islander Children. They ought to have a leading voice in these discussions and be empowered to shape the solutions.

**How can we ensure that the concerns raised by young people in the Talking with Young People about the National Framework consultation report, commissioned under the Third Action Plan, inform the Fourth Action Plan?**

- The Benevolent Society believes further must done to ensure we are listening to and respecting the voices of children across Australia. We recommend the engagement of young people in consultations to develop the fourth action plan. Further we strongly support early engagement with young people and families impacted by the policy in a co-design process with a particular focus beyond 2020.

**Priority Area 1 - Improving outcomes for Aboriginal and Torres Strait Islander children at risk of entering, or in contact with child protection system**

**General comments:**

- In relation to issues that involve Aboriginal and Torres Strait Islander people, The Benevolent Society follows the evidence and the advice of Aboriginal and Torres Strait Islander people and organisations. We are active and strong supporters of the Family Matters campaign and use our voice as a non-Indigenous organisation to call on governments to work in genuine partnership with Aboriginal Community Controlled Organisations and peak bodies.

- In response to the specific questions in Priority Area 1 relating to how the Fourth Action Plan should work to improve outcomes for Aboriginal and Torres Strait Islander children, we defer to the responses of the Aboriginal and Torres Strait Islander children’s peak bodies, notably SNAICC as the national peak body.
- We specifically support the calls being made by Aboriginal and Torres Strait Islander people for a National Aboriginal and Torres Strait Islander Children’s Commissioner.

## **Priority Area 2: Improving prevention and early intervention through joint service planning and investment**

### **General comments:**

- The Benevolent Society supports the focus on improving prevention and early intervention through joint service planning and investment as a priority area for the Fourth Action Plan. However, we would like to see greater ambition in the scale and scope of the proposed activities.
- We believe that sufficient evidence exists demonstrating proof of concept and return on investment from a number of place-based early intervention and prevention interventions, and question the need for a further 10 place-based trials. The sole justification for increased trials in the final Action Plan for the National Framework is to address critical gaps in our understanding of what works to support families. The two areas that merit further investigation are:
  - Explicit investigation of strategies to mitigate poverty, social exclusion and inequality as key risk factors in child maltreatment. We note that the Department of Social Services also has carriage of the administration of income support and suggest an integrated approach within that department alongside state and territory policy initiatives.
  - An examination (through action research) of the impact of changes in disability policy on family functioning. Anecdotally, the NFP sector is noting a significant contraction in resources available to support respite care. Given the over-representation of children with disability in the child protection system, we are concerned about the unintended consequences of a more individualised service delivery model on families’ capacity to cope.
- We recommend a review of existing evaluations of place-based early intervention initiatives and that a key action under the Fourth Action Plan is a process for scaling effective placed-based early intervention and prevention initiatives.
- We support the activity outlined under Key Action 2 to map current prevention and early intervention services as a means of generating a common understanding and sharing best practice.

### **Discussion questions:**

#### **What research is needed to address the drivers of entry into out-of-home care? Is it worthwhile to research the risk factors for child maltreatment and to quantify the contribution each risk factor makes to different types of maltreatment?**

- The drivers of entry into out-of-home care are well documented both nationally and internationally, as are the risk factors for child maltreatment. Further research into the drivers should not be a key action for supporting this priority area.
- Research required to improve early intervention and prevention include:
  - Measurement and implications of lead indicators for child wellbeing

- Efficacy and cost benefit analysis of early interventions mapped against the known risk and protective factors
- Efficacy and cost benefit analysis of policy solutions to address disadvantage including place based and cohort focussed interventions
- Models and processes to enable cross agency collaboration during planning and delivery in accordance with the public health approach.

#### **What are the key challenges to delivering these actions?**

- Keeping government leadership engaged and committed is a key challenge. Delivering on the commitment to joint service planning and investment requires ongoing leadership from the Commonwealth and state and territory governments.
- Greater financial investment in early intervention and prevention from all governments is critical to achieving success in this priority area. Despite ongoing political commitments to prioritise prevention and early intervention, only 17.4% of total child protection expenditure is committed to Family Support and Intensive Family Support services at the secondary and tertiary end of the system. The realisation of the public health model upon which the National Framework is premised requires substantially greater investment in primary and secondary services focussing on prevention and early intervention.
- Jurisdictional mandates in relation to both legislation and policy continue to be a significant challenge in standardisation of approach. Personnel with authority to address these barriers must be involved in the negotiation processes. The Benevolent Society supports legislative reform to support a national approach.

#### **How can we measure success and report on progress for these actions?**

- Measures for success in prevention and early intervention should be based on indicators of child and family wellbeing. Indicators for change have been identified in the National Framework noting those for which data does not yet exist. The Benevolent Society recommends addressing these data gaps and releasing an annual report on child wellbeing.
- The non-government sector should work constructively with government in the use and communication of the data and indicators and seek to increase public awareness of progress.

#### **What role could the non-government sector play in implementing or advising on these actions?**

- Evidence exists on the efficacy of a number of programs currently being delivered to prevent child maltreatment, for example Logan Together, South Cairns Collective Impact, Our Place, Mount Alexander and Central Goldfields Early Childhood Intervention Program and Early Years Centres. The non-government sector could work with governments to identify opportunities to take these projects to scale.
- The non-government sector should be consulted to advise on the design of evaluation frameworks, consistent terminology and assist with service mapping.
- A collaborative relationship with the non-government sector could include sharing localised intelligence, innovation partnerships, shared decision making, crisis management and mechanisms to ensure children and families are not falling through the gaps.
- Future funding responsibilities in relation to prevention and early intervention ought to be seen within the context of the public health model, the foundation upon which the National Framework for Child Protection was developed. This requires appropriate funding across the three tiers of the model and for a period of time additional funding to ensure the current cohort of children in the secondary and tertiary end system are given the best possible care. The Benevolent Society recommends national system modelling based on the public health model approach followed by economic modelling in order to identify future funding

responsibilities. Advice from the non-government sector during both the system and economic modelling would be essential.

- The Benevolent Society recognises that the current structure of the child and family sector means that non-government organisations have a vested (funding) interest in the current business model. The non-government sector could work in partnership with government to address this vested interest to enable more transformative system change.

### **Priority Area 3: Improving outcomes for all children in out-of-home care by enhancing placement stability and ensuring lifelong relationships and a sense of belonging, identity and connection to culture and community, through reunification, and other permanent care options, including adoption**

#### **General Comment:**

- The Benevolent Society supports this priority area with reservations. We are concerned with the lack of transparency surrounding the elevation of the permanency and adoption agenda to the level of a priority area for the action plan. We are critical of the expediency of work on this policy agenda since mid-2017 including the adoption of the Guiding Principles and changes to state legislation and policy at the expense of other priority areas of the National Framework.
- We are further concerned that the expertise of the sector, particularly that of Aboriginal and Torres Strait Islander people have not been respected. AbSec and Aboriginal communities within NSW have publicly stated their opposition to adoption orders within the Child Protection system on the basis that it severs belonging, identity and connection to culture.
- The Benevolent Society recommends that delivery of the proposed key actions addresses the concerns, specifically addressing inappropriate timeframes, lack of safeguards and investment in lifelong supports for the child and their support networks, including birth parents for any permanent care arrangements.
- We recommend re-phrasing of the priority area to focus on improving outcomes for children in out-of-home care, rather than the current limited focus on placement stability. We recommend that actions under a re-phrased priority area seek to ensure implementation of and accountability against all key areas of the National Standards for out-of-home-care, with particular attention to care planning and support on leaving care.

#### **Discussion questions:**

#### **What can we do under this priority area to better meet the needs of Aboriginal and Torres Strait Islander children in the child protection system?**

- Aboriginal and Torres Strait Islander people must be seen as the experts on issues relating to Aboriginal and Torres Strait Islander children. Governments must work in genuine partnership with them and be guided by them on issues relating to Aboriginal and Torres Strait Islander children.
- Evidence supports Aboriginal and Torres Strait Islander people’s strong advice that Aboriginal and Torres Strait Islander children need ongoing, assured connections to their family, kin, community and culture for their wellbeing. The expediting permanency arrangements has not adequately addressed the concerns raised by the Aboriginal and Torres Strait Islander peak bodies. We support the call made by AbSec for a distinct Aboriginal and Torres Strait Islander approach that prioritises the implementation of the ATSCIPP as central to any decision making regarding stability for Aboriginal and Torres Strait Islander children.

- The Benevolent Society supports AbSec’s position that blanket adoption approaches will never be appropriate for Aboriginal and Torres Strait Islander children, as they risk permanently severing the link between a child and the factors that form their Aboriginal and /or and Torres Strait Islander identity. This could have devastating effects on the emotional and psychological wellbeing of these children.

**Should the PRWG continue to lead and implement the remaining strategic action areas? What role should the Aboriginal and Torres Strait Islander Working Group play in developing or implementing these strategic action areas?**

- There appears to be a tension between the agenda being driven by the PRWG and the positions, particularly relating to adoption, being communicated by Aboriginal and Torres Strait Islander leaders. If we are to learn anything from the past, then ensuring an environment where Aboriginal and Torres Strait Islander people are empowered to direct outcomes is essential.
- The Benevolent Society supports the involvement of the Aboriginal and Torres Strait Islander Working Group to ensure they remain an active and guiding voice in these discussions on proposed key actions 1 and 2. The Benevolent Society recognises and respects that this may require a change in the way the work is delivered and the proposed timeframes.

**What are the key challenges to delivering these actions?**

- Insufficient support from the NGO sector based on the lack of evidence and rationale for the legislative changes and failure to respond to the sector’s concerns about unreasonable timeframes, lack of commitment to cultural connection, lack of focus on relational permanency, lack of focus on reunification and no onus on the government to support families before permanent removal.
- Evidence shows that children adopted from out-of-home care are likely to have ongoing support needs related to past abuse, neglect and attachment disruption; and to support relationships with their biological parents. Planning and resourcing for this support will be essential to ensuring the life-long best interests of children.
- The permanent removal of Aboriginal and Torres Strait Islander children from their families brings back the policies of the Stolen Generations for Aboriginal and Torres Strait Islander communities and causes new and lasting trauma.
- Relational permanence is central to the well-being and lifelong outcomes of Aboriginal and Torres Strait Islander children. For these children, permanence is identified by a broader communal sense of belonging; a stable sense of identity, where they are from, and their place in relation to family, mob, community, land and culture. Inflexible legal measures to achieve permanent care may actually serve to sever the connections for Aboriginal and Torres Strait Islander children with their permanent identity breaking bonds that are critical to their stability of identity while in care and in their adult life.

**How can we measure success and report on progress for these actions?**

- Measures for success of any priority areas relating to Action Plans of the National Framework should be based on the indicators for change identified during the drafting of the National Framework, with the primary consideration being the wellbeing and safety of children.

**Priority Area 4: Improving organisations’ and governments’ ability to keep children and young people safe from abuse**

**General Comment:**

- The Benevolent Society supports efforts to increase the safety of children in their families and communities. We recognise the work of the Child Sexual Abuse Royal Commission, specifically their finding that failures to protect children occurred at multiple levels, flowing down from institutions, through to government systems, and into the broader community, manifesting as a culture of permissiveness that permitted abuses to continue with impunity.
- We agree with the need for widespread societal responsibility and are implementing strategies to ensure all of our environments and interactions with children uphold the right of each child to feel safe and be safe from physical, emotional, psychological, sexual and cultural abuse in order to ensure we are a child safe and child friendly organisation.
- The lack of coordination and inconsistent legislation between jurisdictions contributes to the inability of our child protection systems to keep children safe and well. The Benevolent Society supports further discussion regarding legislative reforms to enable a national approach as recommended by the Child Sexual Abuse Royal Commission.
- The Benevolent Society believes that states should be required to demonstrate that everything possible has been done to ensure the wellbeing and safety of a child within their family before an order to remove is given, and that the state should be required to demonstrate that any intervention would leave a child better off throughout the course of their life. These requirements should be considered as part of any legislative reform discussion.

#### **Discussion questions:**

#### **What can we do under this priority area to better meet the needs of Aboriginal and Torres Strait Islander children?**

- Ensure that Aboriginal and Torres Strait Islander people have input into the National Statement of Principles for Child Safe Organisations (National Principles) and strategies from the outset and not an after-thought at the end of the process.

#### **Do you have suggestions on how the National Principles, including the tools and resources developed, should be promoted to increase awareness within the sector?**

- Public state and territory government endorsement of the National Principles would raise their profile within the sector.
- Recognising that operationalising the principles will require additional work by organisations, the uptake and adoption of the National Principles could be enhanced by including them as part of contractual agreements and funding organisations to undertake the work to comply.
- The National Principles could be built into existing regulatory frameworks such as the Human Services Quality Framework , National Quality Framework and National Out-of-Home Care Standards.
- Behavioural change programs such as education campaigns, dissemination of information on best practice and recognition programs via peak bodies and conferences.

#### **Do you have suggestions on how the outcomes of the Inter-jurisdictional Child Protection Information Sharing Project can be built upon to continue to facilitate better information sharing between jurisdictions?**

- The Benevolent Society recommends greater ambition for the Inter-jurisdictional Information Sharing Project and sees the lack of a clear mandate as being a key challenge that has prevented progress by the group leading this project. Greater leadership with engagement by key decision makers in this project is required for the reform that is needed.

**What are the key challenges to delivering these actions?**

- Lack of engagement in the national consultations on the National Principles may be reflected in their lack of support from the sector following COAG endorsement.
- In the absence of COAG endorsed principles, non-government organisations are seeking the development of their own strategies to respond to the child safe recommendations of the Child Sexual Abuse Royal Commission. As a result there has been a proliferation of corporate sector bodies designing child safe packages, conferences and forums and marketing the awareness raising and operational packages. The marketization of this is significant concern for the sector.

**How can we measure success and report on progress for these actions?**

- The measure of an organisations commitment and implementation of the National Principles can be a simple reporting measure captured during audits (the degree to which an organisation has implemented each principle as well as future plans regarding implementation and additional organisation specific strategies).
- Two key indicators of success will be the sustainable implementation of the National Principles and organisational culture supporting the intent of the National Principles. The Benevolent Society is measuring our success against these indicators through a pre and post implementation survey of culture with staff to be reviewed on an annual basis.
- Report on progress should also include a review during audits of allegations and complaints of abuse, number, type and context.