

Child Safe Standards  
Policy and Cabinet Division  
ACT Government  
GPO Box 158  
Canberra ACT 2601

Via email: [ChildAbuseRoyalCommission@act.gov.au](mailto:ChildAbuseRoyalCommission@act.gov.au)

Dear Child Safe Standards,

### **Response to the ACT Child Safe Standards scheme**

The ACT Council of Social Service (ACTCOSS) fully supports the development of an ACT Child Safe Standards scheme based on lessons learned from the Royal Commission into Institutional Responses to Child Sexual Abuse.

ACTCOSS believes there are key issues to consider in the development of this scheme, and our response highlights points across the four questions in the Child Safe Standards discussion paper inviting feedback on the development of the scheme. Our response is informed by our members and their experience with the community sector operating environment.

### **Community sector resourcing**

ACTCOSS stresses that appropriate resources will need to be provided to community sector organisations within the scheme to authentically embed the ten standards in creating organisational cultures that foster child safety and wellbeing.

This includes a realistic understanding from the Oversight Body, sector regulators and funding bodies regarding the substantial financial investment in organisational infrastructure and staff time that would underpin the above – and how this may vary significantly between a larger organisation and a smaller volunteer group.

### **Scope of the scheme**

ACTCOSS supports broad coverage for the scheme, beyond organisations that directly engage with children and young people in the provision of their services. This would mean cultural, service provision and advocacy organisations all ensure children and young people participate in decisions affecting them, are informed about their rights, and are taken seriously. This mirrors the way we ensure service provision and advocacy is appropriate and informed by other cohorts we work with. If the scheme is to be broadly rolled out, appropriate resources and funding need to be provided to enable organisations, especially those without significant experience of working with children and young people, to meet their obligations under the scheme.

The Oversight Body must recognise that child safety needs can vary significantly between age groups and the individual. If the scheme disallowed 1:1 direct engagement between a youth worker and a child or young person, this could present a barrier to relational work in the youth sector, as some individuals respond better to 1:1 engagement. Furthermore, if the scheme sought to change such direct engagement ratios, organisations would also have to be adequately resourced to enable additional youth workers to do so.

Given numerous organisations may already be regulated through other child safety schemes, emphasis should be placed on coordination between the Oversight Body and other regulators to reduce duplication and assist each other in performing their relevant child safety functions.

### **Types of support**

ACTCOSS calls for appropriate resources to be provided for capacity building and a continuous improvement approach to supporting organisations to implement the scheme. The Oversight Body should be closely aware of the time that will need to be expended and types of supports required by organisations to prepare for the scheme. Before formal obligations or enforcement provisions commence, the Oversight Body should begin its awareness raising and capacity building work related to the scheme.

If organisations are required to access qualified training to meet their obligations under the scheme, the government must ensure those training opportunities exist. Adequate funding should also be made available.

Given the varying levels of preparedness and need between organisations, cultivating spaces to enable the sharing of information and the building of communities of practice between organisations, the Oversight Body, and other relevant regulators would strengthen compliance with the scheme.

We also highlight that bullying, racism and discrimination remain a key, daily challenge faced by Aboriginal and/or Torres Strait Islander children in public life. Supports to address this need should be coordinated across the ACT, tailored to navigate varied age groups, and be culturally appropriate. This approach should extend to children and young people vulnerable to similar experiences for example children within the LGBTIQ+ community, children from culturally and linguistically diverse backgrounds including newly arrived migrant families and children with disability.

Yours sincerely,



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Chief Executive Officer

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