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National Office for Child Safety  
Department of Prime Minister and Cabinet  
1 National Circuit  
Barton ACT 2600

Via email: [nationalofficeforchildsafety@pmc.gov.au](mailto:nationalofficeforchildsafety@pmc.gov.au)

**Child Wise response to the National Strategy to Prevent Child Sexual Abuse Final Development Discussion Paper.**

Dear Ms Kilpatrick,

Thank you for the opportunity to respond to the *National Strategy to Prevent Child Sexual Abuse Final Development Discussion Paper*. I note that Child Wise has previously made submissions to inform the development of the Strategy and provide the following in addition.

This Submission responds to the specific consultation questions for further consideration.

**Do the proposed vision and objective reflect what our aim should be and what success should look like under the National Strategy?**

The proposed vision is not sufficiently aspirational given the devastating impact of child sexual abuse. Rather than express a *commitment*, the vision should be resolute and unwavering. As such, we propose that the vision be:

*Children and young people are protected and safe from sexual abuse in all settings.*

**Do the proposed values reflect the values that should be guiding our work under the National Strategy?**

We recommend that *Value One* be amended to include a safeguarding focus, to state – “Child safety *and safeguarding* is everyone’s responsibility...”.

Safeguarding is the action that an organisation or group takes to promote the welfare of children who spend time, participate in or are impacted by their organisation or group - and protect them from harm. This is an obligation of all organisations or groups who interact with children and young people – whether directly or indirectly. Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm.

Child safeguarding refers to the broad range of activity organisations must take to promote the safety and wellbeing of children, and prevent harm. Effective child safeguarding must be embedded in the interactions that children have with an organisation or group. Safeguarding policy and procedure must also specify requirements

for how organisational representatives respond to risk and harm, including abuse or harm that has been experienced by a child or young person outside the organisation.

Do these strategic priority themes reflect the areas of focus for Australia over the life of the First National Action Plan and First Commonwealth Action Plan under the National Strategy (i.e. 2021-2025)?

While we understand that only limited information on specific actions is available at this stage, we strongly recommend that:

#### Priority Theme 1 - Education and Building Child Safe Cultures

- *Must include a focus on child sexual abuse online.*

Actions within this theme must consider the impact of child sexual abuse online.

Child Wise is leading a significant amount of work with its international partners in the areas of online child sexual abuse and recommends that strong national leadership on this issue is articulated through the Strategy. This should include:

- Responses to the prevalence of child sexual abuse online in Australia, including use, creation and distribution of material.
- The increasing use of social media by young people, and the increasing risk this presents to young people.

- *Must include a focus on child safety in the workplace.*

The Strategy should provide national leadership to ensure young people are safe from all forms of abuse at work. Child Wise has commissioned research that highlights a lack of education on child safeguarding in Australian workplaces. As part of this, Child Wise has spoken to young people in the workforce (such as retail casual employment), who have experienced a range of abuse and trauma.

Child Wise is aware that in many retail sectors, young people can make up a large proportion of the workforce, however limited workplace training and education is available to support them, or protections such as working with children checks, from those who work alongside young people.

Child Wise research in this area is consistent with published work by the Australian Human Rights Commission on sexual assault in the workplace.

#### Priority Theme 4 – Offender prevention and intervention

- *Must include a focus on detection and response to child sexual abuse online.*

Actions within this theme must consider the potential use of technology to increase detection of the use, creation and distribution of child sexual abuse online.

Through its international networks, Child Wise is undertaking work with European private sector agencies that specialise in detection of child sexual abuse material online.

There is an existing body of evidence through bodies like the Australian Centre to Counter Child Exploitation of the prevalence of child sexual abuse online in Australia.

The Strategy must make tangible commitments to implement detection technologies, such as those developed by the European firm *NetClean* ([NetClean | Bright technology for a brighter future](#)) to detect and intervene in Australia.

- *Must include a focus on safety for children through enhanced Working with Children Checks in expanded sectors.*

There are several existing limitations in the way working with children checks and other accreditations are operationalised across different jurisdictions. Such checks only capture a point in time, and are not undertaken sufficiently regularly to ensure the ongoing safety of children.

These accreditations are the most basic and essential tool to set the foundation for children safety.

Child Wise is working with Australian firm Oho ([Home - Oho \(weareoho.com\)](#)) to support enhanced and more regular validation of such accreditations.

What are the best ways for Australian, state and territory governments to listen, engage and collaborate with these groups / individuals? Are there any groups you feel are missing?

Are there best practice mechanisms, existing consultation mechanisms or comprehensive co-design approaches that Australian, state and territory governments should use to consult and partner with these groups / individuals?

Consultation with children and young people on their experiences is paramount to the development, implementation, and monitoring of the Strategy.

Child Wise has existing collaboration and partnerships with national and international organisations that specialise in engaging children and young people for this purpose. For example, Child Wise continues to work closely with UK based Mind of My Own ([Mind Of My Own | Making it easier for children and young people to communicate](#)) to engage with young people.

In Australia, Child Wise endorses Stymie ([Stymie](#)) to support young people and parents use technology to increase reporting and detection of harm across settings such as schools.

The Strategy should make use of all these existing instruments that are proven to be successful and fit for purpose in a child sexual abuse context.

Child Wise exists to ensure the safety of children and young people. Child Wise was the first Australian organisation to develop safeguarding standards to evaluate and strengthen child safety practice, and in 2018 we welcomed the introduction of the National Principles (National Principles) for Child Safe Organisations, which reflect our pioneering work.

We would welcome further engagement to support the development and implementation of the *National Strategy to Prevent Child Sexual Abuse*

Kind regards,

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Natalie Siegel-Brown

Child Wise Managing Director