

National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper

The National Catholic Education Commission (NCEC) is pleased to have this opportunity to provide feedback on the National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper (the Paper).

About Catholic Education

The NCEC is the representative body of Australia's Catholic schools. Working closely with state and territory Catholic Education Commissions, the NCEC advocates at the national level on behalf of the Catholic sector and the hundreds of thousands of Australian families who entrust the education of their children to our schools.

Catholic schools are the nation's largest provider of education outside the government. Australia's 1,755 mostly low-fee Catholic schools educate one in five, or 777,000 students and employ more than 100,000 Australians, making Catholic education a key partner in the delivery of quality schooling together with the government and Independent sectors.

Catholic Education is committed to keeping children safe in our schools across Australia and upholds the *National Principles for Child Safe Organisations*.

Consultation Questions

The NCEC supports that the National Strategy to Prevent Child Sexual Abuse will provide a whole-of-nation approach to preventing and responding to child sexual abuse, and that the actions will be delivered jointly by the Australian and state and territory governments.

The Royal Commission into Institutional Responses to Child Sexual Abuse demonstrated that all Australian jurisdictions face similar challenges and issues in respect of promoting and preserving child safety and building child safe organisations. This highlights the importance of achieving a coordinated strategy on a national basis where best practice and standards are recognised and implemented in a consistent manner.

The NCEC believes that the proposed outline as presented in the Paper provides an appropriate and practical framework to guide the vision, objective, and actions of the National Strategy.

Vision, objective and values

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

The NCEC understands that the National Strategy has a specific focus on child sexual abuse, emanating from a key Royal Commission recommendation (Recommendation 6.1). This limited focus on child sexual abuse is an appropriate objective of the National Strategy. However, it

appears somewhat restrictive as an overall strategic vision for Australia's children and young people.

The Vision could be broadened to articulate a positive intent for all children and young people in the first instance. The Vision should recognise the need for protection from all harms of abuse, with a particular emphasis on child sexual abuse. In this way the co-existing nature of different types of abuse is recognised and acknowledged. Emphasising a holistic approach to reducing the risk of harm from all forms of abuse is critical.

A suggested re-worded Vision: Australia is committed to a future where children and young people **can grow and thrive and** are protected and safe from sexual abuse **and other forms of potential abuse**.

The proposed Objective may also benefit from an explicit statement focused on evidence-based practice.

A suggested re-worded Objective: The National Strategy will **use evidence-based preventative strategies to increase protective factors and** reduce the risk, extent and impact of child sexual abuse and related harms in Australia.

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

The NCEC supports the high-level values identified to underpin the National Strategy. The values will provide the appropriate context and emphasis with which to design and implement practical and achievable actions in support of the National Strategy.

While recognising that the values are high-level and cannot be expected to be comprehensive without the additional of supporting actions, NCEC offers the following feedback:

- The clear, unequivocal, simple upfront statement in Value One that "Child safety is everyone's responsibility" is strongly welcomed.
- In support of this emphasis, the word order in Value One could be reversed to read "Individuals, families, communities, industry, non-government organisations and institutions, and Australian governments...".
- **A suggested re-worded Value One:** Child safety is everyone's responsibility. **Individuals, families, communities, industry, non-government organisations and institutions, and Australian governments all have a specific and unique role to play.**
- Strongly supported is the emphasis in Value Three of listening to children's voices, as well as ensuring that engagement and education through the National Strategy is age and otherwise contextually appropriate.
- The values should embrace a focus on strengthening and empowering the capabilities of children and young people to seek help when they feel they are in a threatening situation, promote a safe culture amongst peers and friends, recognise warning flags and signs of abuse, and raise the alarm on behalf of their friends and peers.
- The values rightly accentuate the importance of listening to the voices of survivors and victims, the need for cultural safety, trauma-informed practice, and evidence-based educative initiatives and actions.

- **A suggested re-worded Value Four:** We work in partnership with Aboriginal and Torres Strait Islander people **and culturally and linguistically diverse communities** to embed cultural safety and trauma-informed practice in the design and delivery of child- safe initiatives.
- **A suggested re-worded Value Five:** All initiatives are evidence-based, **and their effectiveness is evaluated using data and research** to build understanding of what works to prevent child sexual abuse.
- It is important that the National Strategy recognises the need to build safeguards into support services, so young people exhibiting harmful behaviours are provided with appropriate educational and other appropriate interventions, such as models of restorative justice. The National Strategy should identify the need to ensure equitable access to prevention and intervention models in regional, remote and very remote parts of Australia.
- **A suggested re-worded Value Six: *In recognition that effective intervention with children and young people needs to move beyond a primarily law and order approach,*** we focus on providing education and behavioural change supports to children with harmful sexual behaviours and delivering evidence-based interventions to deter, manage and rehabilitate adult offenders.
- The proposed values do not currently include valuing the role of and listening to parents and carers as well as equipping parents and carers to protect children and young people, reduce the risk, extent and impact of sexual abuse and related harms, and support and empower victims and survivors in their care. The values should be adjusted to include the important role of parents and carers to prevent and respond to child sexual abuse.
- The National Strategy should clearly identify how it intends to work in concert with existing school and education policies and requirements. Any sector specific guidance materials and evaluative tools should be developed as part of the implementation process and these should be developed in consultation with the education sector.

Strategic priority themes

3. 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)?

In broad terms, the NCEC supports the five proposed strategic priority themes for the first five years of the National Strategy. The proposed themes reflect the feedback gained from the consultations conducted by the National Office in 2018 and 2019 and are appropriate to focus the initial Actions Plans under the National Strategy.

In keeping with the objective of the National Strategy, each priority area should encompass multiple dimensions of work related to child sexual abuse. Priority Theme 1 is an overarching theme emphasising cultural change. From an educational perspective, this theme could be broadened to develop and improve understandings of child safety beyond sexual abuse.

It is important that public awareness and education campaigns recognise that child safe cultures move beyond a focus on child sexual abuse, acknowledging the intersectionality of many forms of harm to children and young people.

The *National Principles for Child Safe Organisations* draw on an examination of what makes institutions child safe. This framework provides an excellent foundation for education and capacity building in organisations and could be adapted for application in different contexts.

The NCEC suggests the following re-worded Priority Themes:

Priority Theme 1: Education *for the whole of the community* and building child safe cultures.

Priority theme 3: *Enhancing national responses to the issue of* children exhibiting harmful sexual behaviour.

Working in partnership

4. 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?

5. 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?

6. Do you belong to or represent one of these groups and wish to be involved in design and implementation of individual actions under the National Strategy once it is launched? a. If yes, please identify which priority themes appear most relevant to you, noting you will have the opportunity to confirm your involvement in individual actions once the National Strategy is launched (and your answer here will not prevent you from being invited to be involved in actions outside any priority themes you have identified).

The NCEC recommends that parents, carers, families, and educators should also be included in these collaborative consultations. These individuals, groups, and communities are key stakeholders who are in positions of direct care and responsibility for children and young people.

While each of the diverse range of stakeholder groups identified in the Paper are represented in Catholic school communities, the NCEC is not the primary representative group for these stakeholders. As such the NCEC offers only general comments regarding consultation and engagement processes and mechanisms to develop and implement initiatives and actions under the National Strategy.

It is imperative that the engagement strategy ensures equity of access to community forums throughout Australia, particularly in regional, remote, and very remote areas.

As noted on page 3 of the Paper, the National Strategy is intended to exist alongside, and complement, significant national, state, and territory level plans already being implemented by governments. The NCEC strongly supports this intention.

As stakeholders such as schools are required to work within overlapping systems of national and state and territory responsibility, the NCEC particularly supports the commitment that the National Strategy, its consultations, actions, and initiatives will not duplicate the measures which are already being discussed, developed, and implemented under other existing plans and frameworks.