



AASW
.....
**Australian Association
of Social Workers**

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*Submission to the Royal
Commission of Inquiry into
Institutional Child Sexual Abuse*

Issues Paper 3: Child Safe Organisations

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Table of Contents

Introduction	3
Responses.....	4
1. The essential elements of establishing a ‘child safe organisation’ that protects children from sexual abuse in an institutional context. In particular, are there core strategies that should be present and others that are less critical?	4
2. The evidence base for the range of strategies associated with making an organisation ‘child safe’. Does this evidence base extend to the physical environment?	9
3. How should the effectiveness of ‘child safe’ strategies be tested?	10
4. How ‘child safe’ policies and procedures work in practice.	10
5. Should there be a universal framework for a ‘child safe organisation’ or should strategies be specifically tailored to particular types of institutional settings?	13
6. The role of staff performance management systems and disciplinary processes in a ‘child safe organisation’.	16
7. The role and characteristics of governance and management leadership in creating and maintaining a ‘child safe’ organisational culture.	16
8. Should there be any additional enforceable requirements for institutions or particular institutions to maintain a ‘child safe’ environment?	16
References.....	16

Introduction

The Australian Association of Social Workers (AASW) is the key professional body representing more than 7000 social workers throughout Australia. Social work is the profession committed to the pursuit of social justice, the enhancement of the quality of life, and the development of the full potential of each individual, group and community in society.

Concern for the wellbeing of children and young people has been a core element of social work practice internationally since the development of social work as a distinct profession. Significant numbers of social workers work in the child wellbeing and protection field in a range of roles including direct case work, management and policy. No other professional discipline is so immersed in the areas of knowledge that are essential for quality relationship-based child welfare practice. As a result, social workers are recognised throughout the world as the core professional group in child protection policy, management and practice.

We are therefore pleased to provide the following submission to the Royal Commission into Institutional Responses to Child Sexual Abuse in response to Issues Paper 3: Child Safe Institutions.

General comment

The following submission includes a range of recommendations aimed at promoting and improving child-safety in institutional settings, however it must be acknowledged at the outset that such strategies and initiatives require resources. Such resources, whether they are human, financial or operational, cannot be guaranteed and therefore we believe that consideration should be given by the Royal Commission not only to the essential elements of a child-safe organisation but to how such elements might realistically be implemented in a range of relevant settings.

For social workers in a broad range of child welfare settings, it is fair to say that resources may already be limited and that the recommendations made here will not have their intended impact without attention given to how such measures might be supported. Further, the AASW believes this support must include attention to how organisations can implement the strategies outlined here and accurately gauge their impacts on child wellbeing and safety. The AASW is concerned that without consideration of the support required to develop and implement the measures recommended here, we risk setting institutions up to fail.

Responses

1. The essential elements of establishing a 'child safe organisation' that protects children from sexual abuse in an institutional context. In particular, are there core strategies that should be present and others that are less critical?

1.1. Background

1.1.1. A number of government and non-government organisations have published policy and practice guidelines and recommendations for the development of child-safe environments. The recommendations outlined here draw on a range of resources including:

- the National Framework for Creating Safe Environments for Children (2005)
- Child Wise 'Choose With Care' (2013)
- Australian Childhood Foundation (2010a, 2010b)
- government publications including Victorian Child Safety Commissioner's 'Guide for Creating a Child-Safe Organisations' (2006); Office of the Children's Guardian (n.d); National Framework for Protecting Australia's Children 2009-2020 (2008)
- literature by the National Child Protection Clearinghouse (2005; 2006) and
- academics and practitioners in the field of child abuse prevention including Ronken 2013; Mildon & Schlonsky 2011; Beyer, Higgins and Bromfield 2005 and,
- the practice wisdom of social workers in a range of settings including schools, hospitals, child welfare and protection services and out of home care.

1.1.2. The AASW has considered these resources from a social work perspective. Specifically, this means that the following recommendations include key issues raised by social workers in a range of child wellbeing and protection settings across Australia about the issues facing all children, and vulnerable children in particular.

1.2 Essential elements of a child safe organisation

The AASW submits that the following 5 strategies are all essential elements of a child-safe organisation. The AASW highlights the fact that these strategies should be seen as inter-related and interdependent; that is, no one strategy is sufficient on its own.

1.2.1 A visible, stated commitment to child safety that is actively promoted, shared, modelled and revised

The AASW recommends this take the form of a:

- Stated commitment to child safety and child rights, which features prominently in organisational publications including recruitment materials
- Statement of child rights, which is underpinned by policies, procedures and practices that facilitate those rights. This should include processes for ensuring that children are empowered, involved and heard at all levels of the organisation.

The AASW recommends that such statements should address the rights of all children and specific groups of children, such as children with disabilities, Aboriginal and Torres Strait Islander and CALD children, in line with the UN Convention on the Rights of the Child (1989).

1.2.2 Recruitment and screening practices

1.2.2.1 The AASW submits that organisations should undertake a range of recruitment and screening practices as **one** mechanism to select suitable and appropriate

people to work with children. The AASW believes the 'Evidence-based guide for risk assessment and decision-making when undertaking background checking' (Community and Disability Services Ministers' Conference, n.d), a resource underpinning the National Framework for Creating Safe Environments for Children (2005), provides a comprehensive overview of relevant factors.

1.2.2.2 The AASW believes that appropriate recruitment and screening practices must include:

- Advertisements that explicitly state the organisations active commitment to child-safety
- Position descriptions and other job-related materials that describe the expectations of employees in relation to their conduct and responsibilities toward children.
- A Working with Children Check or equivalent
- Responses from referees
- An assessment of:
 - an individual's motivation to work with children
 - relevant verifiable experience
 - understanding of children's physical and emotional needs
 - an understanding of appropriate professional boundaries
 - attitudes to child rights and participation
 - values (Child Safety Commissioner 2006)

In addition, the AASW suggests that organisations should undertake a Working with Children Check (WWCC) or equivalent for all staff and volunteers engaging with children.

1.2.2.3 The AASW has previously highlighted to the Royal Commission, and reiterates here, the limitations and inadequacies of current WWCC legislative and operational arrangements as a preventative measure (AASW 2013a). Therefore, under current WWCC arrangements, the AASW submits that the limitations of screening processes must be openly acknowledged and promoted to prevent complacency of staff following standard screening procedures.

1.2.3 Personnel induction, training, mentoring and coaching

Each person involved in delivery of services to children and young people should understand the roles and responsibilities of individuals and internal and external systems or agencies in preventing, addressing and reporting all issues relevant to the wellbeing, safety and protection of children.

The AASW suggests this requires an initial induction and ongoing education, training, mentoring and coaching program. The AASW recommends that this take the form of a national standard on child safety training, which provides guidance to institutions on minimum levels of training appropriate to specific roles (e.g. management versus parent volunteers) and includes minimum standards around timeframes within which training should occur.

The AASW recommends such education, training, mentoring and coaching should include and address:

1.2.3.1 Information on the **factors that impact on a child's vulnerability to abuse.**

This should include the range of risk factors, such as age, gender, history of abuse, disability, Aboriginal and Torres Strait Islander children and a child's temperament and personality (see Irenyi et al 2006, pp. 4-7 for more information on the link between these risk factors and organisational abuse).

1.2.3.2 Current research **on perpetrators of abuse** including:

- gender of abusers in relation to various forms of abuse,
- age,
- issues with identifying or recognising abusive behaviours,
- the victim-to-offender cycle,
- personality of offenders,
- grooming, including attention to the ways in which organisations and environments can be groomed (Ronken 2013),
- myths and facts about perpetrators of sexual abuse,
- awareness of how perpetrators of abuse might create opportunities to have access to children and how to address these, also known as 'situational crime theory'

Irenyi et al (2006, pp. 7-12) provide a good summary of how and why these issues are particularly relevant within an organisational context.

1.2.3.3 Information on the various types of **abuse and neglect** and how they might be demonstrated through a range of acts of commission and omission, attitudes, beliefs or values. As outlined in the AASW's (2013b) submission in relation to Towards Healing, we recommend this include detailed definitions of physical, emotional and psychological and sexual abuse and should address the fact that sexual abuse may or may not involve physical contact. For example, non-contact abuse might include showing a child a pornographic image or asking them to pose in sexual manner (Ronken 2013).

1.2.3.4 Detailed **expectations** on conduct with children including initiating touch with a child, responding to touch from a child and being alone with a child.

1.2.3.5 The relevance of **beliefs, values and attitudes** in recognising, identifying, responding to and addressing alleged abuse. For example, Irenyi et al (2006, p. 15) indicate that sex-role stereotypes, patriarchal, misogynistic and stereotypical viewpoints on male and female sexuality, roles, status and behaviour might impact on an organisations and /or individuals assessment or perception of abusive behaviours and appropriate responses.

The AASW adds the importance of staff and volunteers having an understanding of the ongoing implications of discrimination on the basis of sex, gender, race, age, culture, religion, sexual orientation, ability or socio-economic status on outcomes for children. This might address, for example, the vulnerability and over-representation of Aboriginal and Torres Strait Islander children and children with disabilities in the child protection system.

1.2.3.6 Detailed information on the **organisations commitment to child safety, code of staff conduct and the full range of child safety policies and procedures.**

This should include:

- appropriate responses to allegations of or suspected abuse including legal

and ethical obligations and organisational expectations

- When and to whom the matter should be reported
- issues of confidentiality
- duty of care, and
- consideration of risks associated with reporting, how they should be managed and by whom.
- internal and external pathways for responding to allegations and what pathways should be utilised, when, why and by whom.

1.2.3.7 The AASW recommends that specific staff are identified, trained and supported to receive and respond to child protection concerns. The AASW suggests such positions:

- should be recognised and rewarded as a position of additional responsibility
- receive specialist training on complaints handling best-practice
- receive specialist training on how to identify signs of trauma and avoid re-traumatisation in the reporting process
- receive specialist supervision and debriefing as required with attention given to the possibility of vicarious trauma.

1.2.3.8 Information on screening practices, the management of situational risk and the responsibility of staff with regard to fostering and maintaining a positive child-safe organisational culture.

1.2.3.9 Appropriate **responses** to disclosures of abuse and a framework for supporting and responding to victims and their families.

1.2.3.10 The AASW highlights the critical importance of such training being underpinned by an **implementation strategy** and specifically the availability of ongoing **coaching, mentoring and review processes** to ensure the effective translation of learning to the operational context. This recommendation is explored in further detail in point 4.1 below.

1.2.4 Involving children and caregivers

Children, young people and parents or caregivers should be meaningfully involved in organisational decision making and policy development and review. The AASW recommends a range of existing resources that provide guidance to organisations on how participation can meaningfully and appropriately be achieved in a range of settings (see for example Plan International 2012; Child Safety Commissioner 2006; Save the Children 2010).

1.2.4.1 The AASW believes the involvement of children should include age-appropriate education, information and support to:

- develop **protective behaviours**,
- understand appropriate **conduct of organisational staff** and volunteers
- understand what they can do if anything occurs in their interaction with staff or volunteers that **breaches** such conduct.

The AASW believes this is critical to building the capacity of children to protect themselves.

1.2.4.2 The AASW recommends the development of a National Child Safety / Personal

Safety training curriculum that could be delivered through the education system. The AASW suggests the following programs provide a outline of what such a program could and should address:

- Keeping Safe: Child Protection curriculum (Government of South Australia)
- Keeping Ourselves Safe (New Zealand Police 2012), a program aimed at children and educators of 0-13 year olds. The program has a range of modules that include resources for children, teachers and others on:
 - Knowing What to Do (Years 0-3)
 - Getting Help (Years 4-6)
 - Standing Up for Myself (Years 7-8)
 - Confident Kids (Years 0-8)
 - Building Resiliency (Years 11-13)

1.2.5 A child-safety culture

The literature (as summarised by Irenyi et al 2006, p. 18) suggests that a child-safe culture is one in which:

- Adults and children have high **confidence** that disclosure will be treated seriously and acted upon promptly and appropriately
- Children are treated as individuals with **rights**
- High risk offender-like behaviour, such as constant tickling or touching, is not accepted and is **challenged directly and immediately**
- **Management styles** are open and egalitarian
- All people connected with the organisation feel **empowered** and confident to raise concerns, including children and young people
- Environments are **monitored** to avoid situational risks developing
- All staff and volunteers are comprehensively **trained** in aspects of child abuse such as child and adult grooming
- There is a focus on being **child-friendly**, not just child-safe

2. The evidence base for the range of strategies associated with making an organisation 'child safe'. Does this evidence base extend to the physical environment?

- 2.1** The AASW is conscious of the **paucity of literature and research** focussed on child abuse in organisational settings and therefore the difficulties inherent in detailing effective evidence-based preventative strategies (Beyer, Higgins & Bromfield 2005, p. 99).
- 2.2** The available research, including on extra-familial abuse more broadly, provides some useful guidance for institutions on child safe practice (Irenyi et al 2006, p. 2). In recent years the Australian Council for Children and Youth Organisations (ACCYO) has undertaken a significant body of work on effective child safe organisations and has piloted a child-safe accreditation program.
- 2.3** It is clear however that more dedicated research on the issue of institutional abuse is needed. Irenyi et al (2006, p.2) point to the importance of understanding, for example, the co-occurring nature of abuse within institutions. Irenyi et al (2006 p. 2) state that 'there is evidence that children who experience child sexual abuse in residential institutions often had also experience physical abuse, psychological maltreatment and neglect' (Irenyi et al 2006, p. 2). The AASW submits that there may be a risk therefore associated with strategies that focus on sexual abuse to the detriment of other forms of abuse. Further research is needed to provide the evidence base to support the strategies outlined here.
- 2.4** The AASW recommends that the research gaps identified by the National Child Protection Clearinghouse (2005, p. 99) form the basis of the development of a research agenda on the specific topic of organisational abuse. These are:
- 2.4.1** *'An examination of the circumstances in which organisational child abuse has occurred to inform about criminogenic organisational environments...'*
 - 2.4.2** *Collection of data on current practices and experiences to build a database that may increase the validity of any actuarial risk assessment tools that may be developed in the future.*
 - 2.4.3** *Testing of psychological assessment tools currently used on known intra and extra-familial child abusers to establish if they would screen out abusers from among a general population (Crime and Misconduct Commission 2004).*
 - 2.4.4** *Identification of the characteristics and behaviours of 'professional' (fixated) child sex perpetrators to better understand their motivations to abuse children within the work setting - essential to comprehensive child protection in schools, and other agencies (Sullivan and Beech 2002: 162).*
 - 2.4.5** *Investigation into organisational abuse investigation practices – for example, research to identify the views of those involved in investigations to better inform procedures and practices (Barter 1999).*
 - 2.4.6** *Identification of methods to better monitor the prevalence of organisational child abuse.*
 - 2.4.7** *Collection of data that would assist better targeting of crime prevention strategies and development of best practice guidelines for building capacity in organisations'*

(Beyer, Higgins & Bromfield 2005, p. 99).

3. How should the effectiveness of 'child safe' strategies be tested?

The AASW recommends that additional research in the area of institutional abuse and abuse prevention is required to determine the best methods of measuring the effectiveness of 'child safe' strategies.

4. How 'child safe' policies and procedures work in practice.

4.1 An implementation strategy

The AASW suggests that the translation of child safe policies and procedures into meaningful practices and positive outcomes for children is usefully informed by implementation science.

4.1.1 The Australian Childhood Foundation (2010a), based on a substantial body of research by the Australian Council for Children and Youth Organisations (ACCYO) (Irenyi et al 2006, p. 18), has analysed factors contributing to the abuse or exploitation of children in organisational settings. They identified four '**key organisational vulnerabilities**' that impact on child safety.

These are:

- Lack of knowledge 'about the ways in which abuse occurs in organisations'
- Lack of awareness about the prevalence of abuse within organisations leading to a tendency to ignore or downplay warning signs
- Lack of confidence in implementing organisational policies and procedures or in actively addressing child abuse
- Lack of process and support. Critically, this related to a lack of clarity around roles and an organisational culture of complacency and uncertainty.

The AASW believes this highlights the importance of an implementation strategy to ensure that the measures outlined above are translated into practices that are child-protective.

4.1.2 Implementation research refers to the "scientific study of methods to promote the systematic uptake of clinical research findings and other evidence-based practices into routine practice and, hence, to improve the quality and effectiveness of health care" (Graham et al 2006, p. 17 as cited in Mildon & Schlonsky 2011). This extends to services concerned about child welfare (Mildon & Schlonsky 2011).

4.1.3 The AASW therefore recommends that a core component of translating child-safety measures into practice involves the development of an **implementation strategy**. The National Implementation Research Network (as cited in Mildon & Schlonsky 2011) suggest that an implementation strategy should address:

- Staff selection processes
- Pre-service and in-service training
- Ongoing coaching and consultation with leaders and champions
- Staff performance evaluation
- Quality improvement, fidelity measures and outcome reviews
- Facilitative administrative measures that support the process and help keep staff focussed on the desired outcomes
- System alignment interventions including strategies to work with relevant external systems.

4.2 Comprehensive documentation

The AASW emphasises the need for child-safety measures to be comprehensively documented as part of organisational policy, procedure, practice guidelines and related publications.

4.2.1 The AASW recommends that such documents need to:

- Be user-friendly
- Be easily accessible in terms of physical accessibility and accessibility for people from CALD backgrounds or people with disabilities
- Be reviewed regularly internally and externally for the purposes of ensuring that processes are fair, transparent and handled appropriately. The mishandling of complaints, by institutions such as the Church (Irenyi et al, pp. 13-14), provides an example of the importance of independent review.
- Have definitional and conceptual clarity.

4.2.2 Beyer, Higgins and Bromfield (2005, p. v) highlight the **importance of definitional and conceptual clarity** in documents that address issues of child safety within organisations. A lack of definitional clarity can result in complainants being uncertain, toleration of inappropriate behaviours, false accusations or inappropriate guidelines for people who work with children.

The AASW recommends therefore that an essential element of a child safety framework must be the clear and comprehensive (within reason) definition of key terms. This might include definitions of:

- ‘abuse’, ‘neglect’ and ‘harm’ including clear descriptions of relevant acts of ‘commission’ and ‘omission’. The AASW recommends this should include physical, emotional and psychological and sexual abuse as well as ‘cultural harm’.
- ‘risk assessment’
- ‘screening’
- ‘staff’ and ‘volunteers’
- ‘organisational abuse’, specifically the parameters of what will be considered as abuse that has occurred in an institutional context. Beyer, Higgins and Bromfield (2005, p. vi) provide a useful starting point for thinking about how this might be defined.
- ‘child safety’

4.2.3 Risk assessment and management processes

Risk assessment and management processes are critical to ensuring child-safety within organisations. The AASW supports the findings of Irenyi et al (2006) in terms of the three key components of risk management within institutions. These were outlined as part of the AASW’s submission in response to Issues Paper 1: Working with Children Check and include:

4.2.3.1 Screening

Screening might include a Working with Children Check, individual assessment of characteristics and consideration of previous disciplinary action. While screening is an important part of risk management, the AASW wishes to emphasise its limitations. Many perpetrators of child sexual abuse will not have prior convictions, disciplinary processes or similar that would be identified during a screening process. In addition, there is ‘no reliable ‘profile’ of a perpetrator of

child sexual abuse, or any maltreatment type' that might be identified in the process of individual assessment or screening practices (Irenyi et al 2006, p. 16)

4.2.3.2 Managing situational risk

The AASW endorses a situational crime prevention approach to the management of situational risk. A situational crime prevention approach 'involves opportunity reduction through manipulation of environmental dimensions – making crime more risky, increasing the effort to commit crime, reducing the rewards of crime and removing the excuses used to circumvent moral constraints on behaviour' (Clarke 1997a, 1997b; Clarke and Homel 1997 as cited in Irenyi et al 2006).

4.2.3.3 Creating a positive organisational culture.

The aspects of a child safe organisational culture are outlined in point 1.2.5 above.

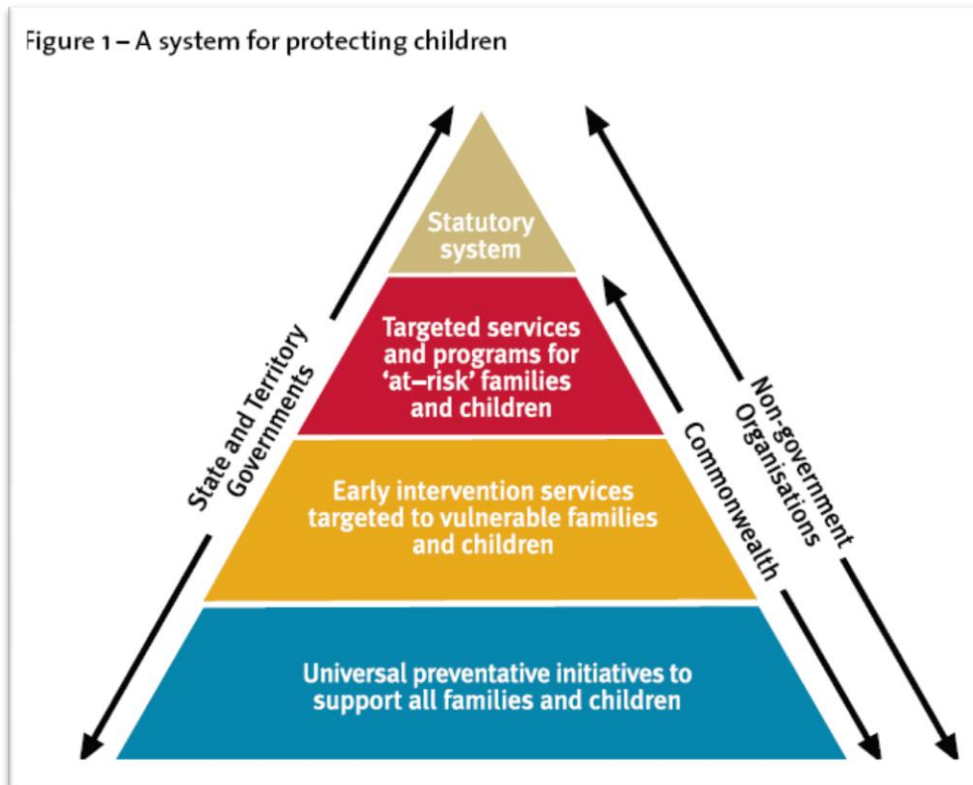
4.2.3.4 Additional considerations

The AASW wishes to highlight the importance of recognising **peer-to-peer abuse**. The literature (see for example Higgins 2013; Quadara 2008 and Beyer, Higgins & Bromfield 2005) suggests that creating child-safe environments requires prevention of peer abuse, victimisation and bullying. Beyer, Higgins and Bromfield (2005, p. 58) state that:

'[p]art of an assessment of organisational risk level should include an assessment of the extent to which children are managed to prevent and disclose bullying, and the presence and operationalisation of strategies in the organisation to promote anti-bullying environments. Strategies may include developing tolerance, respect and understanding between children and development of feelings of pride and attachment to the organisation. Children who bully others have typically been found to be not well integrated into the community and to not feel appropriate feelings of shame (Rigby 2003). No single view is sufficiently comprehensive in providing a definitive answer to what is best practice in the prevention of bullying. However, schools should consider the strengths and limitations of each suggested approach and the appropriateness of its application to particular bully/victim problems (Morrison 2002).'

5. Should there be a universal framework for a 'child safe organisation' or should strategies be specifically tailored to particular types of institutional settings?

5.1 The AASW recommends that some strategies aimed at child-safe organisations could appropriately be developed as universal resources, while others are better suited to being specifically tailored to particular institutional settings. The AASW believes the public health model of child wellbeing presented in the National Framework for Protecting Australia's Children 2009-2020 (2008) provides a useful conceptual basis for thinking about universal and tailored approaches.



5.2 Universal preventative initiatives to support all families and children

The AASW supports the development of a range of strategies that also consider what could be done at a broader societal / community level to address, prevent and respond to institutional sexual abuse. Such strategies are inherently universal in nature. We suggest that Children's Commissions in each State and Territory or national bodies such as Child Wise and ACCYO could have a key role in the development and distribution of resources and training, and in the provision of specific support and guidance on the development, implementation and review of child-safety measures.

The AASW recommends that consideration is given to the following universal strategies:

- 5.2.1** National Child Safety education for all children in schools aligned or incorporated into the national curriculum to equip students with protective knowledge and skills. We believe the Daniel Morcombe Child Safety Curriculum (Queensland Government Department of Education, Training and Employment 2013) and Keeping Ourselves Safe (New Zealand Police 2012) provide good examples of what this might entail.
- 5.2.2** National minimum standards for the training, supervision and coaching of staff and volunteers in child-related settings.
- 5.2.3** A nationally agreed framework for the conduct of investigations into allegations of abuse in institutional settings. The AASW suggests such a framework might address issues such as:
- Guidance on considering the rights of children and rights of staff and volunteers following allegations of abuse.
 - How to respond to a disclosure of abuse. For example, AASW members suggest that investigations can tend to be incident and allegation focussed and adversarial in nature; that is, they can tend to focus on trying to establish whether or not the abusive behaviour occurred to the detriment of considering the impact of the behaviour on the child.

- The skills required for complaints-handling. The AASW suggests that allegations are best dealt with by individuals with specialised training in trauma, child protection and wellbeing. AASW members suggest the following skills are important in responding to allegations of abuse:
 - An understanding of a child's (limited) capacity to provide 'evidence' such as time, date and specific descriptions of behaviours
 - Ability to identify, prevent and address trauma and retraumatisation
 - Skills in interviewing and engaging with children in a child-friendly and developmentally appropriate manner
 - An understanding of the implications of allegations for all relevant parties including the accused, family members, peers, the organisation and community and relevant support structures and possible needs
 - Legal and ethical reporting guidelines.

5.2.4 National structures to enable cross-jurisdictional information sharing about allegations and findings of abuse involving children by staff or volunteers, particularly in the event these persons resign before an investigation has taken place. The AASW suggests this kind of information is incorporated into a national WWCC system as recommend in detail as part of our submission in response to Issues Paper 1 (AASW 2013a).

5.2.5 Child wellbeing and protection specialists to be available to institutions who could provide guidance, advice, supervision and training to organisations on issues of child safety. As previously recommended (AASW 2013a) the AASW believes the Children Commissioners or organisations such as ACCYO in each State or Territory have an important role to play in developing and providing this resource.

5.3 Specifically tailored programs

The AASW believes that specific child-safety measures should be considered for early intervention settings, programs targeted at vulnerable children and families and the statutory system as per the various levels of a child wellbeing and protection system defined by the National Framework for Protecting Australia's Children 2009-2020 (2008).

5.3.1 Risk management strategies

The AASW submits that any risk management strategy must be **highly contextualised** to adequately identify and respond to risk in specific organisational settings and in practice with specific groups of children. For example, AASW members have highlighted that practice with children in specific settings, such as children in out of home care, results in many scenarios where the nature of the work requires practice outside of formal 'organisational' hours and in a range of informal settings. It is the experience of AASW members that the potential for risk is greatest in these settings, which create many possible scenarios for boundary blurring and transgressions. The AASW therefore recommends that any staff or volunteers who work with children in out of hours or informal settings, should be provided with specific and tailored training and ongoing support around how to maintain boundaries, child-safe practice and ameliorate or address risk and transgressions in such settings.

AASW members have provided anecdotal evidence of the **unintended consequences** of some child-safety measures, which suggest the need for greater consideration as part of risk management strategies. For example Bill Budiselik, AASW Western Australia, states that "policies to reduce the opportunities for staff-child abuse can leave children

vulnerable to abuse by peers (e.g. staff refusing to go into change rooms at schools because they fear an allegation, yet letting a “Lord of the Flies” environment develop in the rooms. I have seen children choosing to get changed in public (doorways etc) rather than taking the risk in the rooms”. The AASW recommends therefore that consideration must be given to how child-safety measures may impact on peer-to-peer safety.

6. The role of staff performance management systems and disciplinary processes in a ‘child safe organisation’.

No response.

7. The role and characteristics of governance and management leadership in creating and maintaining a ‘child safe’ organisational culture.

The AASW believes that good governance and leadership are fundamental to the development, implementation and ongoing improvement of a child safe organisational culture.

The AASW submits that, in addition to the strategies outlined in response to question 1 above, that further clarification of organisational leadership for creating and maintaining a ‘child safe’ organisational culture might involve:

- selection criteria, which stipulates the need to articulate and demonstrate a commitment to child rights and wellbeing and an understanding of some of the key organisational risk factors relevant to preventing harm
- Mandatory advanced child safety training
- Performance reviews of leadership team to include as a criteria feedback from staff, volunteers, parents, children about organisational strategies aimed at creating and maintain a physically and emotionally safe environment.

8. Should there be any additional enforceable requirements for institutions or particular institutions to maintain a ‘child safe’ environment?

No response.

Submitted for and on behalf of the Australian Association of Social Workers Ltd



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