

Growing Child Safe Organisations in Queensland

14 September 2023

The Alannah & Madeline Foundation (the Foundation) welcomed the news that the Queensland Government would consult on options for implementing child safe standards and a reportable conduct scheme to improve the safety of children who receive services from organisations or institutions.

We are a national not-for-profit organisation dedicated to keeping children and young people free from violence and trauma wherever they live, learn and play. Our vision is that all children and young people are safe and inspired with the freedom to flourish.

Protecting children from abuse remains essential. The urgency of the issue was demonstrated recently by the [Australian Child Maltreatment Study](#): a nationally representative survey of 8,500 adults which found that 32% had experienced physical abuse during childhood; 28.5% experienced sexual abuse; 30.9% experienced emotional abuse; 8.9% experienced neglect; and 39.6% witnessed domestic violence. Over the generations, there was a decline in rates of physical abuse, and of sexual abuse by a parent, pointing to some progress. However, rates of emotional abuse, neglect, and exposure to domestic violence had not changed much, and some forms of sexual abuse – e.g. by adolescent perpetrators – had increased.

Queensland organisations have a vital part to play in changing this situation for the better.

The Foundation adds our voice in support of the proposal. Given the nature of our work in Queensland, we focus on child safe standards here. We do not feel well placed to comment on the proposed reportable conduct scheme, although we welcome the Queensland Government's attention to the matter.

Our presence in Queensland

The Foundation is proud to provide supports for children and young people in Queensland, including:

- 761 Buddy Bags provided in 2022 to children entering emergency care - e.g. child protection, family violence services, or following a natural disaster. Buddy Bags are backpacks filled with carefully selected items focused on children's physical, emotional and mental wellbeing - e.g. pyjamas, socks, underwear, toothbrush, toothpaste, hairbrush, books, activities and cuddly toys.
- Digital Licence+ : an innovative online learning experience that helps build digital intelligence in students aged 10-14 years, giving them the knowledge and skills they need to harness the opportunities and deal with the challenges of the digital world. 4,356 students across 129 Queensland schools have completed at least one module.
- Media Literacy Lab: a fully accessible, gamified e-learning program for students aged 12-16, designed to equip them with the critical thinking skills they need to navigate the digital world and maintain positive social and emotional wellbeing. 62 Queensland schools have registered for the program.

Meanwhile, the Foundation is proud to work with Dolly's Dream, which is changing the culture of bullying through education and direct support to young people and families in regional, rural and remote Australia.



With the Queensland Education Department, Dolly's Dream co-funded the eSmart Schools initiative from 2019-23. eSmart Schools provides a road map to help schools evaluate their systems, policies and practices in online safety and to build stronger supportive partnerships across the school community to help keep students safe. Nearly 300 Queensland schools are currently registered for eSmart.

We are also delighted that Queenslanders continue to be the most engaged community in Dolly's Dream activities, fundraisers and conversations.

Our position

To uphold children's safety in Queensland's organisations effectively and consistently, a legislated scheme mandating compliance with child safe standards is the best way forward. Leadership and regulatory powers should be vested in an independent, trusted, expert, publicly funded body, whose role should include a strong emphasis on awareness-raising and organisational capacity-building.

The aim should be to provide a level of protection to children in organisational settings at least equivalent to that outlined in the National Principles for Child Safe Organisations. Ideally, Queensland would also draw upon any additional approaches from other states and territories which 'raise the bar' higher on child safety.

As such, we support **Option 3** proposed by the Queensland Government: an independent, publicly funded oversight body to regulate and oversee mandatory implementation of child safe standards, with a key focus on supporting organisational capacity-building.

We lean towards **Option 3(a)**: a collaborative regulatory model whereby a single, independent oversight body collaborates with relevant regulators and funding bodies to support organisations to comply. We suspect this approach would deliver greater consistency than a co-regulatory model – Option 3(b) – wherein the oversight body has responsibility only for organisations that do not have appropriate co-regulation already, while using formal co-regulation with existing sector regulators and funding bodies. However, we recognise there are complexities. If a co-regulatory approach is adopted, it will be important to ensure people can identify easily which regulatory body has oversight of their organisation's compliance with the standards.

To reduce the risk of cases falling through the cracks, we believe Queensland should align with the National Principles, as most other states and territories have done so, or seem likely to do so, albeit in varied ways. It would also be valuable to identify any points of higher protection for children in other jurisdictions' models – i.e. above and beyond the National Principles – and adapt these to the Queensland context.

For example, [Victoria](#) aligns to the National Principles but has added an extra standard: 'Establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal [and Torres Strait Islander] children and young people are respected and valued'. Victoria also includes additional requirements concerning facilitation of child and youth participation (Requirement 3.5); opportunities for and responsiveness to children and young people's contributions (Requirement 3.6); and attention to a culturally safe environment for Aboriginal children and young people (Requirement 5.4).

Meanwhile, the [NSW standards](#) (based on those of the original Royal Commission) arguably set a threshold of expectation slightly higher than that of the National Principles concerning staff and volunteer compliance with a code of conduct (Standard 1, item 1.4); children's participation in decision-making (Standard 2, item 2.1);



and training for staff and volunteers in recognising signs of organisational child abuse and responding to disclosures (Standard 7, items 7.1 and 7.3).

The end game should be to ensure that Queensland's children are protected within organisational settings to a level at least equivalent to, if not stronger than, other states and territories. To achieve this, it is also essential to ensure evidence-based best practices, organisational lived experience, and the voice of children and young people informs the design and delivery of Queensland's child safe standards.

The same principle should apply when assessing which organisations the child safe standards should cover. For example, [Victoria's](#) standards cover some organisations not listed specifically in the Royal Commission's original scope, including organisations that employ a child and are required to hold a permit issued under the Child Employment Act 2003 for that employment; local councils; family violence or sexual assault services; youth services; and counselling services for children. We would welcome a commitment to an equivalent level of coverage in Queensland.

Finally, we voice our strong support for the Queensland Government's push to make cultural safety for Aboriginal and Torres Strait Islander children and young people a clear, unequivocal priority within any future child safe standards.

We would welcome the opportunity to discuss any of these matters further. Please contact:

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