



Monitoring the Implementation of the Royal Commission recommendations

Rapid review findings – FINAL REPORT

WA Commissioner for Children and Young People

KPMG

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Contents

Executive Summary	Page 5
Background and scope	Page 7
Methodology	Page 12
Progress reporting	Page 15
Summary of responses	Page 20
Progress against Recommendations	Page 27
Findings	Page 51
Potential next steps	Page 54
Appendices	Page 56

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Acronyms

A number of acronyms and abbreviations are used in this document for simplicity, please see the below list for clarification where necessary.

ACT	Australian Capital Territory	National Principles	National Principles for Child Safe Organisations
ACARA	Australian Curriculum Assessment and Reporting Authority	NESA	NSW Education Standards Authority
ACCCE	Australian Centre to Counter Child Exploitation	National Strategy	National Strategy to Prevent Child Sexual Abuse
AFP	Australian Federal Police	NSW	New South Wales
CCYP	Commissioner for Children and Young People	NT	Northern Territory
COAG	Council of Australian Governments	QLD	Queensland
COVID-19	Coronavirus 2019	SA	South Australia
DSS	Department of Social Services	SAPOL	South Australian Police
eSafety Office	Office of the eSafety Commissioner	TAS	Tasmania
National Framework 2009-2020	The National Framework for Protecting Australia's Children 2009-2020	VIC	Victoria
National Office	National Office for Child Safety	WA	Western Australia

Executive Summary

Executive summary

The Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) released its Final Report in 2017, featuring 189 recommendations to the Commonwealth, State and Territory Governments and institutions to improve the safety of children and young people. Governments committed to provide annual progress reports outlining their respective progress in implementing these recommendations for five years.

KPMG was engaged by the WA Commissioner for Children and Young People (CCYP) to undertake a rapid review of the progress of recommendation implementation, focusing on those pertaining to making institutions child safe (Volume 6). This involved a desktop review of all published progress reports from each of the nine relevant jurisdictions from 2018, 2019 and 2020.

After 3 years, just 2 of the 24 recommendations from Volume 6 (Making Institutions Child Safe) have been completed by the Commonwealth Government. These are:

- Endorsement of the National Statement of Principles of Child Safe Organisations (Recommendation 6.7)
- The Australian Government should create a ministerial portfolio with responsibility for children's policy issues, including the National Framework for Child Safety (Recommendation 6.18).

Recommendation 6.7 is being led by the Commonwealth Government (with support from States and Territories) and lays the foundation for the ongoing implementation of recommendations relating to child safe institutions. Recommendation 6.18 was implemented through the appointment of Assistant Minister for Children and Families in December 2017. The majority of recommendations are in progress, with varying levels of progress being reported between jurisdictions, who are each undergoing child protection reforms independent of the Royal Commission. States and Territories all report working towards aligning their legislation, practices, procedures and processes to the nationally consistent policies that have been introduced, which takes varying degrees of effort due to the nuances within each jurisdiction.

There is no formal coordination of the monitoring and reporting of progress of implementation of Royal Commission recommendations. The Commonwealth, State and Territory Governments each individually report on their respective efforts in the preceding period, without overarching consolidation. This lack of coordinated oversight has resulted in inconsistent reporting between jurisdictions. This limits the ability to undertake interjurisdictional comparisons of progress. At their own discretion, States and Territories vary to the extent that they explicitly report against specific recommendations, with some jurisdictions providing overarching summaries of the whole volume, whereas others will systematically report against each individual recommendation.

Following from this rapid review, there are a range of steps that could be considered to advance the monitoring and reporting of the implementation of recommendations from the Royal Commission, including expanding the scope of the review to include other recommendations of the Royal Commission, particularly those related to child safe institutions from Volume 7 and 8, and engaging with stakeholders from other jurisdictions to add a qualitative component to the analysis.

Background and Scope

Background

The Royal Commission

Calls for a national inquiry

The Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) was recommended to the Governor-General by former Prime Minister Julia Gillard in November 2012. This recommendation for a Royal Commission was made in response to a growth in the broader community's awareness of the problem of child sexual abuse in institutional contexts and the subsequent increased support for a national inquiry.

The Royal Commission investigation included direct input from people who had been affected by child sexual abuse in an institutional context, public hearings, roundtables, the issuing of case study reports, consultation and issue papers, and policy and research reports, among other activities.

The Final Report was presented to the Governor-General in December 2017. The Final Report included 189 recommendations to ensure that child sexual abuse in institutional contexts is prevented and institutional responses are improved.¹

Implementation of the recommendations

The implementation of the recommendations from this Final Report is the responsibility of Australian and State and Territory governments. The Final Report identified that monitoring and reporting on progress towards the implementation of these recommendations would be essential. It was suggested that the Australian Government should initiate a 10-year review to establish:

- The extent to which the Royal Commission recommendations have been implemented
- The extent to which the measures put in place to implement these recommendations have been effective in preventing child sexual abuse in institutional contexts, improving institutional responses, and ensuring that victims of child sexual abuse receive appropriate treatment, support, and justice,.
- To identify what further steps must be taken to continue improvement in relation to child sexual abuse in institutional contexts.

The Final Report also suggested that the respective governments should monitor and report on their own implementation of the recommendations annually in the five years following the publication of the report.



1. The Royal Commission made a total of 409 recommendations across the Final Report (189), Criminal Justice Report (85), Redress and Civil Litigation Report (99) and Working with Children Checks (36). This rapid review focuses on recommendations from the Final Report.

Scope

Child safe organisations

The Royal Commission made a series of recommendations relating to improving the safety of children and young people through enhancing child safe organisations. These are described in Volumes 6, 7 and 8 of the Royal Commission's Final Report, which speak to the need for a national approach to making institutions child safe.

Volume 6: Making institutions child safe – looks at the role community prevention could play in making communities and institutions child safe, the child safe standards that will make institutions safer for children, and how regulatory oversight and practice could be improved to facilitate the implementation of these standards in institutions. It also examines how to prevent and respond to online sexual abuse in institutions in order to create child safe online environments.

Volume 7: Improving institutional reporting and responding – examines the reporting of child sexual abuse to external government authorities by institutions and their staff and volunteers, and how institutions have responded to complaints of child sexual abuse. It outlines guidance for how institutions should handle complaints, and the need for independent oversight of complaint handling by institutions.

Volume 8: Recordkeeping and information sharing – examines records and recordkeeping by institutions that care for or provide services to children; and information sharing between institutions with responsibilities for children's safety and wellbeing, and between those institutions and relevant professionals. It makes recommendations to improve records and recordkeeping practices within institutions and information sharing between key agencies and institutions.

The focus of this review is on the implementation of recommendations from Volume 6 of the Final Report.

Scope

Volume Six

This volume pertaining to creating child safe institutions was underpinned by the United Nations Convention on the Rights of the Child, which was ratified in Australia in 1990. This volume highlights the systemic institutional failings across institutions and communities which contributed to a failure to protect children from sexual abuse and respond appropriately and effectively when it did occur. Volume Six is structured to comprehensively examine the following opportunities for improvement:

- Creating child safe communities through prevention.
- What makes institutions safer for children.
- Improving child safe approaches.
- Preventing and responding to online child sexual abuse in institutions.

A total of 24 recommendations were listed against the aforementioned categories, with recommendations aimed at different responsible parties in the Final Report. This is outlined in the tables to the right.

Recommendations	Responsibility
6.1 – 6.3	Commonwealth
6.4 – 6.6	State and Territory
6.7	Joint responsibility
6.8 – 6.11	State and Territory
6.12	Joint responsibility
6.13 – 6.18	Commonwealth
6.19	Joint responsibility
6.20 – 6.22	Commonwealth
6.23	State and Territory
6.24	Joint responsibility

Responsibility	Total Recs
Commonwealth	12
State and Territory	8
Joint responsibility	4

Scope

At the time of their Final Report in December 2017, the Royal Commission noted in Volume Six 4.2.2 (pg. 243 - 247) that Australian states and territory had adopted different mandatory and voluntary approaches to child safety in institutions and that many children's commissioners and guardians had been promoting child safe initiatives and had developed resources.

The Royal Commission identified that Victoria had legislated mandatory child safe standards. These standards came into effect for the first phase of institutions in 2016, with full implementation in 2017. This enactment was made in response to a recommendation from the Victorian Parliament's report, *Betrayal of trust: Inquiry into the handling of child abuse by religious and other non-government organisations* (2013). The Commission for Children and Young People, Victoria, helps institutions comply with the child safe standards, and in some sectors, existing regulatory arrangements have been expanded to include monitoring of and compliance with these standards. The Victorian Parliament amended the *Child Wellbeing and Safety Act 2005 (Vic)* to allow for oversight and enforcement of the Victorian child safe standards as the responsibility of the Commission for Children and Young People and the amendments started to take effect on 1 January 2017.

Methodology

Methodology

This rapid review is focused exclusively on publicly available progress reports released by State, Territory and the Commonwealth Governments. These were identified through internet searches using search terms of “Royal Commission Progress Report” and each of the State and Territory names. This information was cross referenced against the Commonwealth Government’s central resource for survivors and victims of institutional child sexual abuse, their families and supporters, government, institutions and members of the public, which contains links to progress reports from the Commonwealth, State and Territory Governments. www.childabuseroyalcommissionresponse.gov.au/annual-progress-reporting

Original government responses from each State and Territory, as well as progress reports from 2018, 2019 and 2020 were reviewed (see Appendix A). A reporting tracking template was developed (see Figure below).

Reviewers, where possible, categorised recommendations as being accepted, accepted in-principle, noted, for further consideration, or not accepted. Status of recommendation is categorised as: complete, in progress, not yet started, and undetermined.² In progress is loosely defined as having commenced at one or more locations. Reviewers considered status responses (e.g. complete) reported by those responsible for the implementing the recommendations (where this was available), as well as other reported information to make a determination of the status of each recommendation.

Qualitative or quantitative assessment of the adequacy or completeness of recommendation implementation is out of scope for this rapid review. This review does not feature stakeholder engagement to capture qualitative supplementary information.

Figure 1: Reporting tracking template

Final Report Volume Number	Recommendation Number	Recommendation Description	Jurisdiction	Accepted?	Status	Year	Key findings	Response	Qualitative Assessment	Quantitative Measure
<i>Report volume number in numerical format</i>	<i>Recommendation number in numerical format</i>	<i>Recommendation description verbatim from volume</i>	<i>Jurisdiction name in abbreviated format</i>	<i>Was the recommendation accepted by the jurisdiction?</i>	<i>Status of the response</i>	<i>Year of report in numerical format</i>	<i>1-2 sentence summary of response for quick reference</i>	<i>Response to the recommendation verbatim from document</i>	<i>No entries at this stage.</i>	<i>No entries at this stage.</i>
e.g. 6, 7, 8	e.g. 6.1, 7.2, 8.3		Commonwealth	Accepted	Undetermined					
			NSW	Accepted - In Principle	In Progress					
			VIC	For Further Consideration	Completed					
			ACT	Rejected	Not yet started					
			QLD	Noted						
			TAS							
			SA							
			WA							
			NT							

Source: KPMG, 2021

2. This classification system was used, as opposed to the one described in the Parenting Research Centre’s report on the implementation of recommendations arising from previous inquiries (i.e. Implemented in full, partially implemented, not implemented, undetermined) due to the relatively short time frame since the release of the Royal Commission Final Report, and the expectation that reform activities may continue for some time. The classification system used in the Parenting Research Centre’s report is indicative that the implementation period has concluded

Limitations

While the Commonwealth, States and Territories have all agreed to report on progress towards the implementation of recommendations, our review of reported data has identified several limitations:

- Inconsistency between jurisdictions in terms of what information is being reported and how.
- Inconsistent systematic responses directly against recommendations.
- Some jurisdictions have developed their own inconsistently defined 'themes' to inform their implementation, which combine several volumes or areas from the Final Report, meaning responses are drifting further from their originally stated intent.
- Inconsistent reporting of the progress of activities, with the reviewer having to identify from generic text which recommendation was being referred to.
- A lack of clarity regarding which specific recommendations are at which status point (e.g. commenced, completed).
- Governments seem to report on existing or peripheral activities which have some commonalities with the recommendations, but appear to have different objectives. Governments are 'shoe-horning' these existing initiatives into their responses.
- Responsibility of certain recommendations is not directed to State and Territory Governments (e.g. Australian Government, local government) which is not reported on.
- It is unclear if jurisdictions report additional progress to the Commonwealth, as the annual Commonwealth reports feature case studies from States and Territories which do not appear in the respective State's progress reports.
- Findings are limited to what has been reported in the annual progress reports, which precludes progression or finalisation of recommendations that may have occurred in 2021 (for example, the establishment of the National Strategy to Prevent Child Sexual Abuse which received funding in the 2021 budget is not considered as it sits outside the reporting regime).
- Inconsistent oversight of responses meaning progress reports are not subjected to quality assessment or assurance.
- Some jurisdictions combine Royal Commission reporting with reporting of other jurisdiction-based activities which results in a lack of clarity.
- Inconsistent application of reporting for 2018, with some jurisdictions using their formal Government Response as the progress update, whereas others providing more detailed progress against the recommendations.

Progress Reporting

Progress reporting

To inform the development of recommendations, the Royal Commission commissioned the Parenting Research Centre to evaluate the extent to which 288 recommendations from 67 inquiries (as nominated by the Royal Commission) have been successfully implemented, and identify factors which were enablers or barriers to this implementation.³

This review identified that factors enabling implementation include: establishing processes and structures to facilitate implementation, including governance and coordination mechanisms; strong leadership and stakeholder engagement; and, an accountability framework and monitoring process. It was identified that the accountability and monitoring should be embedded into recommended reforms, with the need for monitoring to be transparent, independent and sustainable.

The Australian National Audit Office recently released a report which considers the approaches that agencies and entities are taking to implement parliamentary and audit recommendations.⁴ Relevant to the Royal Commission, this report identified that successful implementation of recommendations requires strong leadership and governance, including:

- Establishing clear processes and responsibilities for responding to recommendations,
- Clearly assigning responsibility for progression,
- Establishing systems in place to monitor and track the implementation of recommendations and
- Reporting to relevant committees.

As part of the Final Report, the Royal Commission recommended (17.2):

The Australian Government and State and Territory governments should, beginning 12 months after this Final Report is tabled, report on their implementation of the Royal Commission's recommendations made in this Final Report and its earlier Working With Children Checks, Redress and civil litigation and Criminal justice reports, through five consecutive annual reports tabled before their respective parliaments.

All States and Territories committed to this annual reporting, through the publication of five consecutive annual progress reports commencing in December 2018.

Recommendation 17.4 called for a 10-year review by an independent expert to establish the extent to which the Royal Commission's recommendations have been implemented 10 years after the tabling of the Final Report.

3. Parenting Research Centre. (2015). Implementation of Recommendations Arising from Previous Inquiries of Relevance to the Royal Commission into Institutional Responses to Child Sexual Abuse: Final report

4. Australian National Audit Office. (2021). Implementation of Recommendations: Audit insights. [Implementation of Recommendations | Australian National Audit Office \(anao.gov.au\)](https://www.anao.gov.au/implementation-of-recommendations) Accessed: 23 July 2021.

Progress reporting

Initial responses

Following the release of the Final Report, State, Territory and Commonwealth Governments published respective responses to the findings and recommendations. This table shows how many recommendations from the Final Report the Commonwealth and each State and Territory accepted, accepted in-principle, noted, referred for further consideration, or rejected in their initial responses to the Final Report. The response to these recommendations may have changed between the initial responses and subsequent annual progress reports. For example, transitioning from 'further consideration' to 'accept' but this is not systematically reported. This table indicates a significant inconsistency in the number of recommendations taken on as responsibility by each jurisdiction, and variation in the total recommendations responded to across a number of jurisdictions.

State	Accepted	Accepted in-principle	Noted	Further consideration	Not accepted	Total
New South Wales	71	54	60	4	-	189
Victoria	29	77	81	2	-	189
Queensland	16	104	59	9	-	189
Western Australia	20	88	80	1	-	189
South Australia	25	45	85	40	1	196*
Tasmania	25	63	43	-	-	131**
Northern Territory	46	49	82	12	-	189
Australian Capital Territory	49	53	84	3	-	189
Commonwealth	27	41	117	5	-	190*

*South Australia and the Commonwealth broke down some recommendations into sub-components (e.g. 6.10.a, 6.10.b) and responded to each so the total may not be an accurate reflection of total recommendation numbers. Responses to sub-components have only been counted separately where the responses differ (e.g. 'accepted' 6.10.a, 'noted' 6.10.b) and not where they were the same (e.g. 'accepted' 6.10.a, 'accepted' 6.10.b).

** Tasmania did not respond to any of the recommendations directed at religious institutions and therefore has a smaller total. All other jurisdictions recorded 'noted' responses against these recommendations.

Progress reporting

Volume Six

Jurisdictions varied in terms of the level of detail provided relating to their acceptance (or otherwise) of the recommendations of the Final Report. As not all recommendations were directed to States and Territories, individual jurisdictions took differing approaches in recognising recommendations outside their responsibility. For example, Queensland Government accepted in-principle recommendations directed to the Commonwealth, whereas South Australia Government noted these.

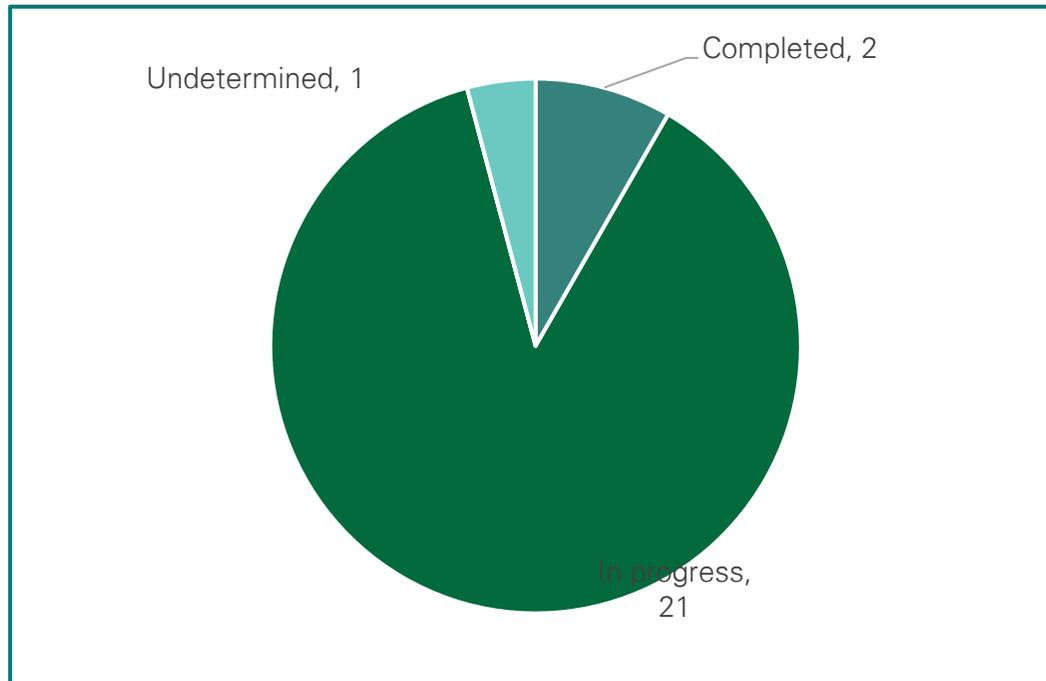
Jurisdiction	Accepted	Accepted in-principle	Noted	Further consideration	Not accepted
New South Wales	17	7	-	-	-
Victoria	3	13	8	-	-
Queensland	3	17	-	4	-
Western Australia	-	16	8	-	-
South Australia	2	9	11	2	-
Tasmania	-	10	14	-	-
Northern Territory	6	5	10	3	-
Australian Capital Territory	2	11	11	-	-
Commonwealth	9	11	3	1	-

Progress reporting

Volume 6 contains 24 recommendations relating to making institutions child safe. Overall, two (2) of these recommendations (6.7) have been categorised as complete, with 21 in progress, and the status of 1 recommendations remains undetermined based on the content of the Commonwealth, State and Territory annual progress reports. These progress statuses have been inferred based on the descriptive content of the annual progress reports as official progress status updates against each recommendation were not available.

These categorisations are based on the overall level of implementation as at December 2020, which may vary slightly from state to state. For example, individual states or territories reported that they had completed some recommendations, but the overall status of the recommendation was graded as 'in progress' due to completion being exception rather than the rule. Some States and Territories also may have reported progress against recommendations that were not their responsibility to implement.

Figure 1. National implementation status of Volume 6 recommendations, as at December 2020



Status	Recommendation Number
Completed	6.7, 6.18
In progress	6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.8, 6.9, 6.10, 6.11, 6.13, 6.14, 6.15, 6.16, 6.17, 6.19, 6.20, 6.21, 6.22, 6.23, 6.24
Undetermined	6.12

Source: KPMG, 2021

Summary of Responses

Summary of responses

This section summarises the status and progress of each of the 24 recommendations from Volume 6 of the Final Report. More detailed responses against each of the recommendations are outlined in the subsequent section starting on page 27.

Rec	Description	Responsibility	Status	Progress
6.1	The Australian Government should establish a mechanism to oversee the development and implementation of a national strategy to prevent child sexual abuse.	Commonwealth	In progress	Response is led by the Commonwealth, with support from States and Territories. Consultation and co-design has been undertaken, with stakeholder feedback gathered to inform the National Strategy to Prevent Child Sexual Abuse ('National Strategy').
6.2	The national strategy to prevent child sexual abuse should encompass the specific complementary initiatives	Commonwealth	In progress	Response is led by the Commonwealth, with support from States and Territories to collaborate on initiatives under the National Strategy.
6.3	The design and implementation of these initiatives should consider a range of factors	Commonwealth	In progress	Response is led by the Commonwealth, with support from the States and Territories.
6.4	Institutions should implement the Child Safe Standards identified by the Royal Commission.	States and Territories	In progress	States and Territories have accepted or accepted in principle the Child Safe Standards. VIC, WA, the NT and the ACT state that they are already compliant, are reviewing their existing policies, or are developing new legislation.
6.5	The Child Safe Standards are set out	States and Territories	In progress	All States and Territories have made some progress against the Child Safe Standards by introducing new initiatives or reviewing existing programs, policies and resources.

Summary of responses

Rec	Description	Responsibility	Status	Progress
6.6	Institutions should be guided by core components when implementing the Child Safe Standards	States and Territories	In progress	As above. This recommendation provides a more detailed breakdown of the Child Safe Standards.
6.7	The National Statement of Principles for Child Safe Organisations should be endorsed by the Council of Australian Governments.	Commonwealth, States and Territories	Completed	The new National Statement of Principles for Child Safe Organisations has been endorsed by the Council of Australian Governments (COAG). These will inform ongoing collaboration between the States and Territories to ensure a nationally consistent approach to child safe organisations.
6.8	State and Territory governments should require all institutions in their jurisdictions that engage in child-related work to meet the Child Safe Standards identified by the Royal Commission at Recommendation 6.5.	States and Territories	In progress	States and Territories report progress in ensuring that the Child Safe Standards are met by institutions that engage in child-related work, with initial progress made in multiple jurisdictions including the introduction of legislative frameworks.
6.9	Legislative requirements to comply with the Child Safe Standards should cover a range of institutions.	States and Territories	In progress	Most States and Territories have demonstrated a degree of progress towards mandating implementation of the Child Safe Standards in institutions. While they have not provided examples of mandated implementation in institutions, VIC, WA and the NT have demonstrated progress on the Child Safe Standards more broadly.
6.10	State and Territory governments should ensure that an independent oversight body is responsible for monitoring and enforcing the Child Safe Standards	States and Territories	In progress	Progress has been made towards the establishment or identification of oversight bodies, but it is unclear how much progress has been made in relation to sector regulators. States and territories have reported that, where possible, existing oversight bodies and frameworks have been leveraged.

Summary of responses

Rec	Description	Responsibility	Status	Progress
6.11	Each independent State and Territory oversight body should have the additional functions	States and Territories	In progress	Little detail was clearly available in regards to the additional functions of the oversight bodies in the States and Territories and any progress made in the development of these.
6.12	Local governments should designate child safety officer positions from existing staff profiles to carry out the child safe functions	Lead: Local government Support: Commonwealth, States and Territories	Undetermined	This recommendation is the responsibility of local governments in collaboration with State and Territory governments. Progress was not captured in most State and Territory annual progress reports.
6.13	The Australian Government should require all institutions that engage in child-related work for the Australian Government, including Commonwealth agencies, to meet the Child Safe Standards	Commonwealth	In progress	This recommendation is the responsibility of the Commonwealth Government and was not discussed in detail in the State and Territory annual progress reports. The Commonwealth has developed the Commonwealth Child Safe Framework and the National Office for Child Safety ('National Office') is developing resources to help implement this.
6.14	The Australian Government should be responsible for evaluating and reporting, as well as coordinating direct input and capacity building and awareness raising	Commonwealth	In progress	This recommendation is the responsibility of the Commonwealth Government and was not discussed in detail. The Commonwealth states that the National Office is working to raise awareness and change the culture in institutions and the community to support child safety and wellbeing, but no details are provided of actions being undertaken.

Summary of responses

Rec	Description	Responsibility	Status	Progress
6.15	The Australian Government should develop a new National Framework for Child Safety in collaboration with State and Territory governments.	Commonwealth	In progress	The Commonwealth Government has led the development of a successor plan for when the current National Framework for Protecting Australia's Children ends. Work was continuing according to the Commonwealth's most recent annual progress report.
6.16	The Australian Government should establish a National Office for Child Safety to provide a response to the implementation of the Child Safe Standards nationally, and to develop and lead the proposed National Framework for Child Safety.	Commonwealth	In progress	The National Office was established in the Department of Social Services in July 2018. It moved to the Department of Prime Minister and Cabinet in 2019.
6.17	The National Office for Child Safety should report to Parliament and have the specific functions	Commonwealth	In progress	This recommendation is the responsibility of the Commonwealth government in relation to the functions of the National Office. Details on the functions were not outlined in the Commonwealth annual reports.
6.18	The Australian Government should create a ministerial portfolio with responsibility for children's policy issues, including the National Framework for Child Safety.	Commonwealth	Complete	This recommendation was implemented through the appointment of the Assistant Minister for Children and Families in December 2017.

Summary of responses

Rec	Description	Responsibility	Status	Progress
6.19	Ministers for education, through the Council of Australian Governments, should establish a nationally consistent curriculum for online safety education in schools.	Commonwealth, States and Territories	In progress	Significant progress has been made towards the establishment of a nationally consistent curriculum for online safety education in schools in each jurisdiction. Details were not provided on relation to the involvement of children and young people in its development, nor how it will be tailored and delivered in ways that ensure equality of access.
6.20	Building on its current work, the Office of the eSafety Commissioner should oversee the delivery of national online safety education aimed at parents and other community members to better support children's safety online.	Commonwealth	In progress	This recommendation is the responsibility of the Office of the eSafety Commissioner to oversee. A number of resources have been developed across the States and Territories aimed at parents and other community members to facilitate support of children's safety online.
6.21	Pre-service education and in-service staff training should be provided to support child-related institutions in creating safe online environments.	Commonwealth	In progress	Training for pre-service and in-service staff has been developed in a number of States and Territories as well as at a Commonwealth level to equip staff to support safe online environments. Challenges to achieving this recommendation exist in States such as South Australia, where the government noted that it cannot mandate university course content and suggested that the independent oversight body may be best placed to collaborate on this.

Summary of responses

Rec	Description	Responsibility	Status	Progress
6.22	In partnership with the proposed National Office for Child Safety the Office of the eSafety Commissioner should oversee the development of an online safety framework and resources.	Commonwealth	In progress	The Office of the eSafety Commissioner oversaw the development of a number of online safety resources for use in schools. However, there was no clear progress towards the development of an online safety framework as required in this recommendation.
6.23	State and Territory education departments should consider introducing centralised mechanisms to support government and non-government schools when online incidents occur.	States and Territories	In progress	Centralised mechanisms to support schools when online incidents occur were existing or under development in South Australia and the Australian Capital Territory. Further development is needed in these States and Territories, as well as the others that did not mention any progress against this recommendation.
6.24	In consultation with the eSafety Commissioner, police commissioners from States and Territories and the Australian Federal Police should continue to ensure national capability for coordinated, best practice responses by law enforcement agencies to online child sexual abuse.	Commonwealth, States and Territories	In progress	Progress has been made against this recommendation through the creation of the Australian Centre to Counter Child Exploitation (ACCCE) in 2018, the ThinkUKnow online safety education program, and Operation GRIFFIN (formerly the National Child Protection Working Group). The eSafety Commissioner also investigates complaints made about online child sexual abuse material and takes direct action to facilitate its removal. Further development in this area appears necessary as not all States and Territories have addressed this recommendation.

Progress against Recommendations

Progress against recommendations

Recommendation 6.1: *The Australian Government should establish a mechanism to oversee the development and implementation of a national strategy to prevent child sexual abuse. This work should be undertaken by the proposed National Office for Child Safety (see Recommendations 6.16 and 6.17 in Chapter 4) and be included in the National Framework for Child Safety (see Recommendation 6.15 in Chapter 4).*

This recommendation is being **led by the Commonwealth through the National Office for Child Safety ('National Office')**, with ongoing input and **contributions from States and Territories** through the Children and Families Secretaries Group Priority Four Child Safety Working Group.

- The National Office is managing the design and implementation of a National Strategy to Prevent Child Sexual Abuse ('National Strategy').
- Over 350 individuals and groups had been consulted by 2019.
- Co-design workshops were held with State and Territory Governments and with Aboriginal and Torres Strait Islander organisations, policy makers, front-line workers, and researchers.
- Stakeholder feedback said that the National Strategy should:
 - increase awareness and education about preventing child sexual abuse from happening and promoting online safety for children, families, the community and professionals.
 - support a system that is trauma-informed, nationally consistent, responsive and properly resourced.
 - support cultural change and build awareness and understanding of child sexual abuse, including reducing stigma and supporting people to get help.
 - include initiatives for offender prevention.
 - improve responses, treatment and support for children with harmful sexual behaviours.
 - set a strong research agenda.

STATUS: In progress*

* Since the last progress reporting period, the National Strategy to Prevent Child Sexual Abuse has been announced with funding provided in the 2021-22 Federal Budget

Progress against recommendations

Recommendation 6.2: *The national strategy to prevent child sexual abuse should encompass the following complementary initiatives:*

- a. *social marketing campaigns.*
- b. *prevention education delivered through preschool, school and other community institutional settings*
- c. *prevention education for parents delivered through day care, preschool, school, sport and recreational settings, and other institutional and community settings.*
- d. *online safety education for children, delivered via schools.*
- e. *online safety education for parents and other community members to better support children's safety online.*
- f. *prevention education for tertiary students*
- g. *information and help-seeking services to support people who are concerned they may be at-risk*
- h. *information and help-seeking services for parents and community members*

- This is being **led by the National Office with support from States and Territories** who have prioritised collaboration to progress this recommendation (and others relating the National Strategy).
- It is noted that there are potential financial implications for State and Territory Governments.
- State and Territory progress specifically against the listed initiatives is discussed in later recommendations.

Status: In progress*

* Since the last progress reporting period, the National Strategy to Prevent Child Sexual Abuse has been announced with funding provided in the 2021-22 Federal Budget

Progress against recommendations

Recommendation 6.3: *The design and implementation of these initiatives should consider:*

- a. *aligning with and linking to national strategies for preventing violence against adults and children, and strategies for addressing other forms of child maltreatment*
- b. *tailoring and targeting initiatives to reach, engage and provide access to all communities, including children, Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities, people with disability, and regional and remote communities*
- c. *involving children and young people in the strategic development, design, implementation and evaluation of initiatives*
- d. *using research and evaluation to:*
 - i. *build the evidence base for using best practices to prevent child sexual abuse and harmful sexual behaviours in children*
 - ii. *guide the development and refinement of interventions, including the piloting and testing of initiatives before they are implemented.*

- This **recommendation is the responsibility of the Commonwealth Government**. States and Territories report a commitment to support the implementation of this action.

Status: In progress

Progress against recommendations

Recommendation 6.4: *All institutions should uphold the rights of the child. Consistent with Article 3 of the United Nations Convention on the Rights of the Child, all institutions should act with the best interests of the child as a primary consideration. In order to achieve this, institutions should implement the Child Safe Standards identified by the Royal Commission.*

- **Most States and Territories have clearly ‘Accepted – In Principle’ this recommendation, and the Commonwealth has ‘Accepted’.** All states and territories have demonstrated progress towards aligning with the Child Safe Standards to some degree.
- The **Victorian Government** reported that they were compliant with the Child Safe Standards following the Victorian Parliamentary Inquiry into the Handling of Child Abuse by Religious and Other Non-Government Organisations. A review of the effectiveness of the existing Victorian Child Safe Standards in 2019 identified that they have improved organisational culture and safety for children. Victoria indicated that they were working to align the Child Safe Standards with the National Statement of Principles for Child Safe Organisations (‘National Principles’)*.
- **In Western Australia**, a whole of government risk assessment was completed with key agencies who have since turned their attention to developing and implementing treatment plans to address the risks and strengthen good practice. The Department of Communities has also begun consultation with community organisations on their preparedness and progress towards implementing the National Principles. This will inform the development of an efficient approach for implementing the National Principles in institutions.
- **In the ACT**, the Education Directorate has reviewed their policy framework to embed the Child Safe Standards into schools, and the ACT Government sought community and stakeholder feedback in 2018 to inform the development of a disability justice strategy.
- The **Northern Territory Government** endorsed the Child Safe Principles in June 2018. These are central to the legislative reform agenda and will inform the development of a single Act to ensure the safety and wellbeing of children are centred in policy development.

Status: In progress

*The National Statement of Principles for Child Safe Organisations (‘National Principles’) were developed jointly by the Commonwealth and State and Territory governments, and were informed by the Child Safe Standards.

Progress against recommendations

Recommendation 6.5: *The Child Safe Standards are:*

1. *Child safety is embedded in institutional leadership, governance and culture*
2. *Children participate in decisions affecting them and are taken seriously*
3. *Families and communities are informed and involved*
4. *Equity is upheld and diverse needs are taken into account*
5. *People working with children are suitable and supported*
6. *Processes to respond to complaints of child sexual abuse are child focused*
7. *Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training*
8. *Physical and online environments minimise the opportunity for abuse to occur*
9. *Implementation of the Child Safe Standards is continuously reviewed and improved*
10. *Policies and procedures document how the institution is child safe.*

- The Child Safe Standards are reflected in the National Principles for Child Safe Organisations, which were **developed jointly by the Commonwealth and State and Territory Governments**. These National Principles also have a broader scope than child sexual abuse, and are intended to cover other forms of potential harm to children and young people. The COAG agreed to the National Principles.
- The **National Office for Child Safety is providing leadership for the implementation** of the National Principles.
- States and Territories differ in their implementation due to existing systems, and are addressing the Standards and Principles through a range of activities at the local level (addressed in more detail against Recommendation 6.8).
- Relevant departments continue to work to integrate the Standards within relevant policies, procedures, practices and culture.
- Implementation is occurring alongside large scale reform activities (e.g. Their Futures Matter (NSW) and legislation (e.g. *Human Rights Act 2019* (Queensland))).

Status: In progress

Progress against recommendations

Recommendation 6.6: *Institutions should be guided by core components when implementing the Child Safe Standards (see Appendix B for a full list of all Standards and associated core components).*

- The core components were incorporated into the draft 'National Statement of Principles for Child Safe Organisations' with minimal changes.
- State and Territory Governments are looking at how to embed these within their existing practices and processes, and determining if further guidance and materials is required, especially for smaller organisations and sole traders.
- Some States and Territories report having guidelines in place (e.g. Victoria, Queensland, Western Australia).
- Examples of how this recommendation is being implemented include:
 - In 2019, the National Office for Child Safety commissioned the **NSW** Ombudsman's Office to develop the Complaint Handling Guide for upholding the rights of children and young people (the Guide). The Guide provides practical advice to organisations about how to develop, implement and maintain a complaint-handling system that prioritises child safety and promotes the rights of children and young people to have a voice in decisions that affect them.

Status: In progress

Progress against recommendations

Recommendation 6.7: *The national Child Safe Standards developed by the Royal Commission and listed at Recommendation 6.5 should be adopted as part of the new National Statement of Principles for Child Safe Organisations described by the Community Services Ministers' Meeting in November 2016. The National Statement of Principles for Child Safe Organisations should be endorsed by the Council of Australian Governments.*

- The **National Statement of Principles for Child Safe Organisations were endorsed by COAG in February 2019.**
- The National Principles provide guidance in a **nationally consistent way for organisations working with children and young people to develop and maintain a child safe culture.** The development of a nationally consistent approach to implementation of the Principles is expected to be developed in 2021.
- **States and Territories are continuing to progress** applying the National Principles, led by the National Office for Child Safety. This work is expected to continue for several years. The National Office has commissioned resources to help support organisations to implement the National Principles.
- The Commonwealth Government also asked the **Australian Local Government Association to inform local governments of their responsibilities in implementing the National Principles.** The ALGA has promoted them to their 537 local government council members.
- In **Western Australia**, a whole-of-government risk assessment was completed to monitor the implementation of the National Principles, and steps are underway to develop and implement a treatment plan to strengthen good practice and address potential risks. The published annual progress report did not clarify the nature of risk being assessed.
- **South Australia** recorded this recommendation as complete in the state's 2020 recommendation status report.

Status: Completed

Progress against recommendations

Recommendation 6.8: *State and Territory governments should require all institutions in their jurisdictions that engage in child-related work to meet the Child Safe Standards identified by the Royal Commission at Recommendation 6.5.*

- States and Territories are continuing to examine how the Standards can be implemented in child-related organisations. Legislation has been developed or introduced in many jurisdictions that outlines requirements for child safe organisations' operations. Victoria, Western Australia and the Northern Territory have not clearly identified progress that can be related to this recommendation. Key examples of progress include:
 - **In NSW**, the Office of the Children's Guardian consulted affected sectors to develop a scheme to regulate the Child Safe Standards in organisations. Legislation to underpin the scheme was being developed and due to be introduced in 2021.* The Office of the Children's Guardian also provides training resources and supports to institutions as they implement child safe policies and practices. Training and workshop on child safety were delivered to over 5,300 individuals (online and face-to-face).
 - **The Tasmanian Government** has committed to developing a legislative framework for Child Safe Organisations that supports the Child Safe Standards. This development was still in progress in 2021.
 - **In South Australia**, legislation was set to be introduced in 2018 outlining requirements for organisations, authorities and people to ensure that environments are safe for children and young people.
 - **In Victoria**, as noted by the Royal Commission in the Final Report, legislated compulsory Child Safe Standards have been in place for more than 50,000 organisations since 2017.
 - **In the ACT**, legislative amendments were introduced to the Education Act 2004 that require non-government schools to begin implementing recommendations relating to the Child Safe Standards. The ACT Government delayed legislation to introduce the Child Safe Standards scheme in 2020 whilst organisations were responding to COVID-19, and at the time of reporting was scheduled for introduction in late 2021.
 - **In Queensland**, institutions were already subject to a framework for protecting children to whom services are provided. Many government agencies have undertaken a self-assessment of their policies and operational procedures, with most self-reporting to be largely compliant with the standards.

Status: In progress

* Since the last NSW Annual Report on Progress (December 2020), the Children's Guardian Amendment (Child Safe Scheme) Bill was introduced to Parliament of NSW in May 2021 to embed the Child Safe Standards as the primary framework for guiding child safe practice in NSW organisations.

Progress against recommendations

Recommendation 6.9: *Legislative requirements to comply with the Child Safe Standards should cover institutions that provide:*

- a. *accommodation and residential services for children, including overnight excursions or stays*
- b. *activities or services of any kind, under the auspices of a particular religious denomination or faith, through which adults have contact with children*
- c. *childcare or childminding services*
- d. *child protection services, including out-of-home care*
- e. *activities or services where clubs and associations have a significant membership of, or involvement by, children*
- f. *coaching or tuition services for children*
- g. *commercial services for children, including entertainment or party services, gym or play facilities, photography services, and talent or beauty competitions*
- h. *services for children with disability*
- i. *education services for children*
- j. *health services for children*
- k. *justice and detention services for children, including immigration detention facilities*
- l. *transport services for children, including school crossing services.*

- Most States, Territories and the Commonwealth Governments have demonstrated progress against this recommendation across a number of key institutions. As noted by the Royal Commission in the Final Report, legislated compulsory Child Safe Standards have been in place for more than 50,000 organisations in Victoria since 2017. The 2019 review of the Victorian Child Safe Standards proposed to retain the current scope of organisations required to comply with the Child Safe Standards which is aligned but broader than those proposed by the Royal Commission.
- See progress notes on Recommendation 6.8 for information on overall progression on legislative requirements for institutions, and Recommendation 6.4 for general progress towards the Child Safe Principles.

Status: In progress

Progress against recommendations

Recommendation 6.10: *State and Territory governments should ensure that:*

- a. *an independent oversight body in each State and Territory is responsible for monitoring and enforcing the Child Safe Standards. Where appropriate, this should be an existing body.*
- b. *the independent oversight body is able to delegate responsibility for monitoring and enforcing the Child Safe Standards to another State or Territory government body, such as a sector regulator.*
- c. *regulators take a responsive and risk-based approach when monitoring compliance with the Child Safe Standards and, where possible, utilise existing regulatory frameworks to monitor and enforce the Child Safe Standards.*

- The need for an independent oversight body and sector regulator in each State and Territory that is made responsible for monitoring and enforcing the Child Safe Standards was addressed by several jurisdictions in their annual progress reports. These jurisdictions are exploring how these existing operations could be utilised to provide the oversight called for in this recommendation.
- **In the ACT**, a number of existing bodies provide child safety oversight functions. The ACT Government expressed the intention to work with stakeholders to identify options for oversight across the government and non-government sectors and to explore how the Child Safe Standards will interact with existing oversight functions.
- **The Queensland Government** also identified existing oversight and governance mechanisms, but identified that an independent inspectorate would be established relating to justice following the recommendations of the Youth Detention Review and the 2017 Queensland Parole System Review.
- **In Western Australia**, the Department of Premier and Cabinet was working in conjunction with the Independent Oversight Working Group to develop advice for Government on options for an independent oversight system. Consultation was expected to be undertaken between November 2020 and early 2021.
- **The South Australian Government** identified that the functions proposed for the oversight body in the Royal Commission Final Report went beyond the scope of existing functions. Further work was necessary to determine whether an independent oversight body was an appropriate option for South Australia.
- **In Victoria**, as noted in the Final Report, the Commission for Children and Young People has been the independent oversight body responsible for monitoring and enforcing the Child Safe Standards since 2017. The 2019 review of the Victorian Child Safe Standards recommended a mechanism to delegate responsibility to sector regulators (Rec 6.10(b)) and provision of improved suite of compliance and enforcement powers to better enable a responsive risk-based approach to regulation (Rec 6.10(c))

Status: In progress

Progress against recommendations

Recommendation 6.11: *Each independent State and Territory oversight body should have the following additional functions:*

- a. *provide advice and information on the Child Safe Standards to institutions and the community*
- b. *collect, analyse and publish data on the child safe approach in that jurisdiction and provide that data to the proposed National Office for Child Safety*
- c. *partner with peak bodies, professional standards bodies and/or sector leaders to work with institutions to enhance the safety of children*
- d. *provide, promote or support education and training on the Child Safe Standards to build the capacity of institutions to be child safe*
- e. *coordinate ongoing information exchange between oversight bodies relating to institutions' compliance with the Child Safe Standards.*

- There was **little detail available across the annual progress reports on the listed additional functions for the independent oversight bodies.**
- **In NSW**, training has been provided on what it means to be a child safe organisation. The delivery of face-to-face training on the Child Safe Standards was hindered by the impacts of COVID-19. However, a substantial increase in those accessing online eLearning programs from the Office of the Children's Guardian on child safe practices was noted. The Office also developed YouTube videos and webinars to reach stakeholders.
- **The South Australian Government** noted that this recommendation was dependent on the implementation of Recommendation 6.10, which was under further consideration. It was noted that none of these functions are currently undertaken by an independent oversight body in South Australia.
- **In Victoria**, the Commission for Children and Young People has been the independent oversight body responsible for monitoring and enforcing the Child Safe Standards since January 2017. The 2019 review of the Victorian Child Safe Standards recommended revised objectives and functions to further align with recommendation 6.11.

Status: In progress

Progress against recommendations

Recommendation 6.12: *With support from governments at the National, State and Territory levels, local governments should designate child safety officer positions from existing staff profiles to carry out the following functions:*

- a. developing child safe messages in local government venues, grounds and facilities*
- b. assisting local institutions to access online child safe resources*
- c. providing child safety information and support to local institutions on a needs basis*
- d. supporting local institutions to work collaboratively with key services to ensure child safe approaches are culturally safe, disability aware and appropriate for children from diverse backgrounds.*

- This recommendation is primarily the **responsibility of local governments**, with support from governments at the Commonwealth, State and Territory levels.
- Progress is not captured in most State, Territory or Commonwealth annual reports. **In Western Australia**, it was noted that the Department of Local Government, Sport and Cultural Industries and the Department of Communities are **working with key stakeholders of the Western Australian Local Government sector to progress this recommendation**. This includes consultation between November 2020 and January 2021 through an information paper, surveys and webinars. The plans for implementation are anticipated to be delivered to the Local Government sector in mid-2021.

Status: Undetermined

Progress against recommendations

Recommendation 6.13: *The Australian Government should require all institutions that engage in child-related work for the Australian Government, including Commonwealth agencies, to meet the Child Safe Standards identified by the Royal Commission at Recommendation 6.5.*

- This recommendation is **directed at the Commonwealth Government**.
- **The final version of the Commonwealth Child Safe Framework was published in August 2019.** The National Office for Child Safety is involved in creating resources to assist Commonwealth entities with implementation of the Framework.
- In early 2020, the National Office for Child Safety reviewed the Commonwealth Child Safe Framework and its application across Commonwealth entities. This review consisted of a survey sent to 120 entities, and demonstrated a move towards improved child safe practices and culture. The review also identified areas where entities required additional support for implementation, and opportunities for increased transparency and accountability.
- Following this review, the Commonwealth Chief Operating Officers Committee agreed that the Framework should be updated. The Commonwealth Child Safe Framework was updated in 2020. From October 2021, Australian Government organisations will need to publicly report on their child safety efforts annually. Implementation of this new Framework through the improvement of child safe practices and policies and the development of new materials across departments and organisations was supported by the National Office for Child Safety.
- Commonwealth entities must do the following to promote the protection of children in the services and activities they fund:
 - Conduct annual risk assessments to determine the level of responsibility they have for children, and implement strategies to reduce risk where necessary.
 - Ensure that staff are aware of, and adhere to, the Commonwealth Child Safe Framework and relevant laws.
 - Implement the National Principles by February 2020.

Status: In progress

Progress against recommendations

Recommendation 6.14: *The Australian Government should be responsible for the following functions:*

- a. evaluate, publicly report on, and drive the continuous improvement of the implementation of the Child Safe Standards and their outcomes*
- b. coordinate the direct input of children and young people into the evaluation and continuous improvement of the Child Safe Standards*
- c. coordinate national capacity building and support initiatives and opportunities for collaboration between jurisdictions and institutions*
- d. develop and promote national strategies to raise awareness and drive cultural change in institutions and the community to support child safety.*

- This recommendation is **directed at the Commonwealth Government**.
- The Commonwealth's 2018 Annual Report notes that the **National Office is working to raise awareness and change the culture in institutions and the community to support child safety and wellbeing**, but does not provide specific examples.

Status: In progress

Progress against recommendations

Recommendation 6.15: *The Australian Government should develop a new National Framework for Child Safety in collaboration with State and Territory governments. The Framework should:*

- a. *commit governments to improving the safety of all children by implementing long term child safety initiatives, with appropriate resources, and holding them to account*
- b. *be endorsed by the Council of Australian Governments and overseen by a joint ministerial body*
- c. *commence after the expiration of the current National Framework for Protecting Australia's Children, no later than 2020*
- d. *cover broader child safety issues, as well as specific initiatives to better prevent and respond to institutional child sexual abuse including initiatives recommended by the Royal Commission*
- e. *include links to other related policy frameworks.*

- This recommendation response is intended to be **led by the Commonwealth Government with support from the State and Territory governments.**
- **The Department of Social Services (DSS) has lead a collaborative approach with State and Territory governments and the non-government sector to develop a successor plan** for when the current *National Framework for Protecting Australia's Children 2009-2020* ends ('The National Framework 2009-2020').
- This has involved national consultations, led by Families Australia, and an evaluation of the National Framework 2009-2020 by PricewaterhouseCoopers.
- Community Services Ministers from the Commonwealth and all States and Territory governments have discussed the scope and purpose of the successor plan in 2020. This has generated support for the development of a new 10-year framework supported by two 5-year implementation plans. **Work is continuing between DSS, the Community Services Ministers and the Children and Families Secretaries group to develop this plan.**
- The development of this new successor plan will be underpinned by two key principles: ensuring that Aboriginal and Torres Strait Islander communities are involved in the design, and ensuring that the voices of children are included in decisions.

Status: In progress

Progress against recommendations

Recommendation 6.16: *The Australian Government should establish a National Office for Child Safety in the Department of the Prime Minister and Cabinet, to provide a response to the implementation of the Child Safe Standards nationally, and to develop and lead the proposed National Framework for Child Safety. The Australian Government should transition the National Office for Child Safety into an Australian Government statutory body within 18 months of this Royal Commission's Final Report being tabled in the Australian Parliament.*

- The **National Office for Child Safety (the National Office) was established in the Department of Social Services in July 2018.** The National Office was to take a leadership role to develop national policies and strategies that improve children's safety.
- From early 2019, the National Office **moved to the Department of the Prime Minister and Cabinet.**
- There is no evidence in the published annual progress reports that the National Office has transitioned into an Australian Government statutory body, as intended by the recommendation.

Status: In progress

Recommendation 6.17: *The National Office for Child Safety should report to Parliament and have the following functions:*

- a. *develop and lead the coordination of the proposed National Framework for Child Safety, including national coordination of the Child Safe Standards*
- b. *collaborate with State and Territory governments to lead capacity building and continuous improvement of child safe initiatives through resource development, best practice material and evaluation*
- c. *promote the participation and empowerment of children and young people in the National Framework and child safe initiatives*
- d. *perform the Australian Government's Child Safe Standards functions as set out at Recommendation 6.15*
- e. *lead the community prevention initiatives as set out in Recommendation 6.2.*

➤ This recommendation is **directed at the Commonwealth Government.**

- The National Office developed and led the coordination of the National Strategy, the new National Framework for Child Safety and the Child Safe Standards and National Principles.
- The National Office also developed resources to support capacity building and continuous improvement of child safe initiatives, with specific resources targeted at the implementation of the above National programs.

Status: In progress

Progress against recommendations

Recommendation 6.18: *The Australian Government should create a ministerial portfolio with responsibility for children's policy issues, including the National Framework for Child Safety.*

- This recommendation was implemented through the appointment of Hon Dr David Gillespie MP as the Assistant Minister for Children and Families in December 2017.

Status: Complete

Progress against recommendations

Recommendation 6.19: *Ministers for education, through the Council of Australian Governments, should establish a nationally consistent curriculum for online safety education in schools. The Office of the eSafety Commissioner should be consulted on the design of the curriculum and contribute to the development of course content and approaches to delivery. The curriculum should:*

- a. be appropriately staged from Foundation year to Year 12 and be linked with related content areas to build behavioural skills as well as technical knowledge to support a positive and safe online culture*
- b. involve children and young people in the design, delivery and piloting of new online safety education, and update content annually to reflect evolving technologies, online behaviours and evidence of international best practice approaches*
- c. be tailored and delivered in ways that allow all Australian children and young people to reach, access and engage with online safety education, including vulnerable groups that may not access or engage with the school system.*

- The **State and Territory governments are collaborating with the Commonwealth Government** through the COAG Education Council to **develop a nationally consistent curriculum for online safety education** in schools. Specific reference to this recommendation was made in the annual progress reports from almost all jurisdictions.
- The **Office of the eSafety Commissioner ('eSafety Office')** works with education departments to **develop online safety material and resources for schools**. By 2018, the eSafety Office had reached 278,172 Australian students through virtual classrooms.
- The Australian Curriculum Assessment and Reporting Authority (ACARA) partnered with the eSafety Office to develop an Online Safety Curriculum Resource. In 2020, **ACARA invited the eSafety Office to support changes to the Australian Curriculum**, specifically helping to focus on the importance of teaching online safety skills from **Foundation to Year 10 levels**.
- **Progress against this recommendation has been made by a number of State and Territory governments:**
 - Online webinars on safe and responsible internet use in the ACT, as well as an online service portal providing access to resources.
 - The Bully Stoppers online toolkit, the PROTECT website and eSmart in Victoria.
 - The Digital Citizenship website in New South Wales.
 - The 'Cybersafety – Making positive online choices' online course for Years 11 and 12 students in Queensland.

Status: In progress

Progress against recommendations

Recommendation 6.20: *Building on its current work, the Office of the eSafety Commissioner should oversee the delivery of national online safety education aimed at parents and other community members to better support children's safety online. These communications should aim to:*

- a. keep the community up to date on emerging risks and opportunities for safeguarding children online*
- b. build community understanding of responsibilities, legalities and the ethics of children's interactions online*
- c. encourage proactive responses from the community to make it 'everybody's business' to intervene early, provide support or report issues when concerns for children's safety online are raised*
- d. increase public awareness of how to access advice and support when online incidents occur.*

- **The eSafety Office runs a national online safety program for parents, carers and other people who work with children, and the broader community.** This program raises awareness and understanding of online safety issues, and includes face-to-face presentations to parents and carers, community groups, sporting clubs and mental health groups.
- The eSafety Office also collaborated with early childhood experts to develop resources for parents, carers and educators to build a **strong foundation for online safety for children under five through the eSafety Early Years Program**. The Playing IT Safe program is also available for early learning settings, and involves a services of digital play-based and offline activities.

Status: In progress

Progress against recommendations

Recommendation 6.21: *Pre-service education and in-service staff training should be provided to support child-related institutions in creating safe online environments. The Office of the eSafety Commissioner should advise on and contribute to program design and content. These programs should be aimed at:*

- a. *tertiary students studying university, technical and further education, and vocational education and training courses, before entering child-related occupations; and could be provided as a component of a broader program of child sexual abuse prevention education (see Rec 6.2)*
- b. *staff and volunteers in schools and other child-related organisations, and could build on the existing web-based learning programs of the Office of the eSafety Commissioner.*

- The eSafety Office provides training on online safety through their teacher professional learning program, and partnered with Universities Australia to develop an online safety toolkit to support students and staff to develop their online safety knowledge and skills. Chaplains can also receive training through the National Schools Chaplaincy Program.
- The Commonwealth annual report states that higher education providers were asked to assess their child sexual abuse prevention education in all child-related courses. The report states that higher education providers reported reviewing existing course content, embedding child protection training modules, and adding eSafety Office content, although does not specify how many providers did this.
- Progress towards this recommendation was also made by state governments, including:
 - The **ACT** Teacher Quality Institute has introduced online safety training for pre-service and in-service teacher training programs. From December 2019, teacher education programs must include guidance on safe learning environments before they can be accredited and must use resources from the eSafety Office.
 - The eSafety Office has provided free courses on online safety to the **NSW** Education Standards Authority (NESA) and the completion of these courses contributes to a teacher's maintenance of accreditation.
 - In 2018, the **Queensland** Government noted the recommendation and highlighted that it would require consideration by authorities that determine course content for a variety of professions, as well as employers. This would require a significant body of work and financial implications. However, it was confirmed that higher education institutions offering teacher education programs include strategies to prevent and intervene in bullying or cyberbullying.
 - The **South Australian** Government noted that it does not have authority to mandate university course content, suggesting that the Commonwealth Government should consider how to collaborate with tertiary institutions and training providers to progress this.

Status: In progress

Progress against recommendations

Recommendation 6.22: *In partnership with the proposed National Office of Child Safety (see Recommendations 6.16 and 6.17), the Office of the eSafety Commissioner should oversee the development of an online safety framework and resources to support all schools in creating child safe online environments. This work should build on existing school-based e-safety frameworks and guidelines, drawing on Australian and international models.*

The school-based online safety framework and resources should be designed to:

- a. support schools in developing, implementing and reviewing their online codes of conduct, policies and procedures to help create an online culture that is safe for children*
- b. guide schools in their response to specific online incidents, in coordination with other agencies. This should include guidance in complaint handling, understanding reporting requirements, supporting victims to minimise further harm, and preserving digital evidence to support criminal justice processes.*

- In 2019, the eSafety Office was developing a resource to provide guidance to schools on preparing, educating and responding to online safety issues. The NSW Department of Education was collaborating to review content and progress the project to the design phase.
- Progress towards this recommendation was also made by state governments, including:
 - The PROTECT website that was developed in **Victoria** to provide resources and guidance that supports education staff to create child safe online environments. The Victorian Government also provided advice to government schools about ensuring safety while engaging in online learning.
 - In the **ACT**, online resources are being developed for schools and parents of students based on the PROTECT materials from Victoria. These materials will provide guidance on prevention and response to child sexual abuse online and will provide advice on the implementation of the National Principles in schools.
 - Similar resources which are also reflected in the response to Recommendation 6.21.

Status: In progress

Progress against recommendations

Recommendation 6.23: *State and Territory education departments should consider introducing centralised mechanisms to support government and non-government schools when online incidents occur. This should result in appropriate levels of escalation and effective engagement with all relevant entities, such as the Office of the eSafety Commissioner, technical service providers and law enforcement. Consideration should be given to:*

- a. *adopting the promising model of the Queensland Department of Education and Training's Cyber Safety and Reputation Management Unit, which provides advice and a centralised coordination function for schools, working in partnership with relevant entities to remove offensive online content and address other issues*
- b. *strengthening or re-establishing multi-stakeholder forums and case-management for effective joint responses involving all relevant agencies, such as police, education, health and child protection.*

- Details on centralised mechanisms to support schools when online incidents occur were identified in South Australia, Queensland and the ACT.
- The **ACT** noted significant progress against this recommendation by 2020. The Education Directorate is collaborating with the Queensland Government Cyber Safety and Reputation Management Unit to inform responses to online safety incidents, and refining relevant protocols to improve the processes associated with investigating incidents.
- In **Queensland**, the Cyber Safety and Reputation Management team works with the eSafety Office to assist state schools to respond and prevent inappropriate online behaviour. This team was noted as a model by the Royal Commission.
- The **South Australian** Department for Education has a centralised Incident Report Management Unit which coordinates reports from government schools, preschool and children's centres. This process includes escalation to appropriate entities. The South Australian Government indicated that this recommendation was 'For Further Consideration' in 2018, considering supporting non-government schools, engaging with the eSafety Office, and the applicability of the Queensland model to the South Australian context.

Status: In progress

Progress against recommendations

Recommendation 6.24: *In consultation with the eSafety Commissioner, police commissioners from States and Territories and the Australian Federal Police should continue to ensure national capability for coordinated, best practice responses by law enforcement agencies to online child sexual abuse. This could include through:*

- a. *establishing regular meetings of the heads of cybersafety units in all Australian police departments to ensure a consistent capacity to respond to emerging incidents and share best practice approaches, tools and resources*
- b. *convening regular forums and conferences to bring together law enforcement, government, the technology industry, the community sector and other relevant stakeholders to discuss emerging issues, set agendas and identify solutions to online child sexual abuse and exploitation*
- c. *building capability across police departments, through in-service training for:*
 - i. *frontline police officers to respond to public complaints relating to issues of online child sexual abuse or harmful sexual behaviours*
 - ii. *police officers who liaise with young people in school and community settings.*

- The Australian Federal Police (AFP) collaborates with the eSafety Commissioner, State and Territory police services and government and industry representatives to ensure a consistent national law enforcement response to online child sexual abuse.
- The AFP and State and Territory law enforcement are involved in the delivery of online safety training to parents, the community and students through the ThinkUKnow Australia program.
- The eSafety Office is involved in the development of a coordinated and best practice approach to child sexual abuse by law enforcement agencies. Nationally, the eSafety Office developed their *Our Child Safety Policy* in consultation with law enforcement. At an international level, eSafety has leadership roles in the WePROTECT Global Alliance, dedicated to ending the sexual abuse and exploitation of children online, and INHOPE, a global network of member hotlines.
- Progress towards this recommendation was also made by state governments, including:
 - **ACT Policing** considering their involvement in additional forums relevant to child sexual abuse online.
 - The **Queensland Police Service** hosting the Youth, Technology and Virtual Communities conference to bring together law enforcement representatives with industry partners to discuss solutions to child sexual abuse online.
 - The **South Australian Police** (SAPOL) has existing initiatives such as membership of a number of key working groups and committees, an online covert investigations (child exploitation) course, sexual offence training provided to recruits, a sexting online training package, and a Memorandum of Understanding with the eSafety Commissioner.

Status: In progress*

* Reported as completed by South Australia

Findings

Findings - outcomes

Since the Royal Commission released the Final Report in 2017, the Commonwealth, State and Territory Governments have committed to improving processes to support enhanced responses to institutional child sexual abuse. In total, 189 recommendations were directed to the Commonwealth, State, Territory and Local Governments and institutions. This has been accompanied by a raft of activities at the national, state and local level designed to respond to these recommendations.

Three years since the release of the Final Report, two (2) of the 24 recommendations from Volume Six have been completed according to publicly available reports published by Australian jurisdictions, with 21 in progress and for 1 the status is undetermined. The implemented recommendations relates to the endorsement of the National Statement of Principles of Child Safe Organisations (Recommendation 6.7) and the creation of a ministerial portfolio with responsibility for children's policy issues (Recommendation 6.18). For a minority of recommendations categorised as 'in progress' individual states or territories reported they had completed all required actions, such as SA against Recommendations 6.24.

Efforts towards national consistency through the creation of the National Office for Child Safety and national frameworks and principles lay a solid foundation with respect to ensuring institutions are child safe. However, further work is required at the local level to ensure legislation, policies, procedures and processes are in alignment with the nationally recognised industry standard. Under the leadership of the National Office for Child Safety and the Office of the eSafety Commissioner, further coordinated progress against a raft of recommendations is expected to continue.

The recommendations that have been fully implemented (that is, Rec 6.7 - the endorsement of the National Statement of Principles of Child Safe Organisations and 6.18 – establishing a ministerial portfolio for children's policy) were led by the Commonwealth Government, with Recommendation 6.7 implemented with support from States and Territories. Initiatives at the state and territory level are progressing at different paces, with some jurisdictions (e.g. NSW, TAS, and SA) reporting imminent legislative changes that will mandate child safe standards.

States and Territories are at different stages of their child protection reform journeys, independent of the Royal Commission. As a consequence, each jurisdiction is undertaking activities which relate to child safety, but which may not completely align with the intent of the recommendations of the Royal Commission. For instance, Victoria developed Child Safe Standards in response to the Victorian Parliamentary Inquiry into the Handling of Child Abuse by Religious and Other Non-Government Organisations, which while similar to those published by the Royal Commission, are in the process of being refined to better align with the National Principles.

Findings - processes

As noted in the Final Report, monitoring and reporting progress is vital. While not formally recommending it, the Royal Commission identified that oversight of implementation would help support progress and improve responses, while holding government and institutions accountable. Accordingly, each state and territory committed to reporting annually (for five years) on progress against implementation of recommendations of the Final Report.

The mechanism for reporting was left for government to determine. The Final Report suggested that Governments may consider producing a consolidated annual report, and proffered monitoring and reporting could be undertaken through parliamentary committees, central agencies, departments of education or community services, ombudsmen or children's commissioner. The Final Report made specific reference to the National Office for Child Safety (established under these reforms) assuming responsibility for reporting on implementation.

There appears to be no public coordination between States, Territories and the Commonwealth regarding the monitoring and reporting of progress towards the implementation of the Royal Commission recommendations as at 30 June 2021. The Commonwealth, State and Territory Governments each individually report on their respective efforts, without overarching coordination.

As a result, each State and Territory Government has taken their own approach to progress reporting, resulting in inconsistency across jurisdictions in terms of the types of information reported and how. States and Territories report progress inconsistently against specific recommendations with some jurisdictions only providing overarching summarising comments for the entire volume, while others will group recommendations together under a particular text-based response. This lack of consistency in reporting inhibits a clear understanding of progress against specific recommendations, with States and Territories not providing clear indicators of the status of individual recommendations (e.g. completed, in progress).

Some States and Territories seem to combine their responses, not only between recommendations, but also against other similar activities or those being driven by different reform regimes. For instance, NT and SA have incorporated their progress reports into broader reform annual reporting. Updates provided by Governments at times seem to relate to altogether different activities which have high level similarities (for example cyber safety programs) but clearly objectives which vary from the original intent of the Royal Commission recommendations.

Without consistent oversight of responses, there is no quality assurance or sense check being applied at the system level with respect to the accuracy and completeness of progress updates being provided. It is now one-third of the way through the initial implementation period, with a review to establish the extent to which Royal Commission recommendations have been implemented set to take place in 2027, 10 years after the tabling of the final report.

Due to these process and reporting issues, it would be particularly challenging for a community member, including someone affected by child sexual abuse, to be able to reasonably access information and gain a clear understanding of how Governments are implementing the recommendations of the Royal Commission in relation to making child safe institutions.

Potential Next Steps

Potential Next steps

The findings from this rapid review, which had a contained scope and timeframe, provide insights that can be utilised in the next steps of monitoring and reporting the implementation of recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse. Specifically, this could include:

- Expanding the review scope to include other recommendations of the Royal Commission, particularly those related to child safe institutions from Volume 7 and 8.
- Supplementing this desktop review with qualitative inputs from Commonwealth, State and Territory Government stakeholders. This would potentially identify enablers and barriers to implementation that could be addressed to support further implementation.
- Liaising with the Commonwealth, through either the Department or the National Office for Child Safety, to determine if additional oversight mechanisms for recommendation implementation progress reporting are in place or planned, or if they hold monitoring / tracking data that can be shared to provide further insights.
- Working with the Commonwealth, State and Territory Governments to understand if any of the initiatives that have been, or will be implemented in response to the Volume 6 recommendations will be formally evaluated to see if they make a difference with regards to the safety of children and young people.
- Conducting a workshop with Commissioners for Children and Young People from some or all jurisdictions to share these findings and gain insights from the local level.
- Assessing the suitability and completeness of progress reporting responses from State and Territory Governments.
- Engaging with community members, including potentially those with a lived experience, to understand what community expectations are of governments with respect to the monitoring and reporting of the implementation of recommendations.
- Agreeing on, and committing to, clear and realistic timeframes for the completion of recommendations.

Appendices

Appendix A

Table A1: Documents reviewed as part of the rapid review

Document Title	Jurisdiction	Source / Link
The ACT Government First Annual Progress Report: Responding to the Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse	ACT	https://www.act.gov.au/childabuseroyalcommission/documents
The ACT Government Second Annual Progress Report: Responding to the Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse	ACT	https://www.act.gov.au/childabuseroyalcommission/documents
The ACT Government Third Annual Progress Report: Responding to the Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse	ACT	https://www.act.gov.au/childabuseroyalcommission/documents
NSW Annual Report on Progress: Royal Commission into Institutional Responses to Child Sexual Abuse December 2018	NSW	https://www.nsw.gov.au/nsw-government-response-to-royal-commission
NSW Annual Report on Progress: Royal Commission into Institutional Responses to Child Sexual Abuse December 2019	NSW	https://www.nsw.gov.au/nsw-government-response-to-royal-commission
NSW Annual Report on Progress: Royal Commission into Institutional Responses to Child Sexual Abuse December 2020	NSW	https://www.nsw.gov.au/nsw-government-response-to-royal-commission
Royal Commission into Institutional Responses to Child Sexual Abuse: First Progress Report [no date]	NT	https://rmo.nt.gov.au/updates/tabling-of-the-royal-commission-into-the-protection-and-detention-of-children-in-the-northern-territory-annual-report
Safe, Thriving and Connected: Generational Change for Children and Families 2018-2019 Annual Report	NT	https://rmo.nt.gov.au/updates/release-of-the-generational-change-annual-report-2018-19
Safe, Thriving and Connected: Generational Change for Children and Families: 2020 Generational Change Impact Report	NT	https://rmo.nt.gov.au/updates/2020-generational-change-impact-report
Annual Progress Report 2018	QLD	https://www.qfcc.qld.gov.au/knowledge-hub/resource/implementation-recommendations-final-report-royal-commission-institutional
Queensland Government second annual progress report: Royal Commission into Institutional Responses to Child Sexual Abuse - December 2019	QLD	https://www.cyjma.qld.gov.au/resources/dcsyw/about-us/reviews-inquiries/qld-gov-response/gov-annual-progress-report-child-abuse-2019.pdf
Queensland Government third annual progress report: Royal Commission into Institutional Responses to Child Sexual Abuse - December 2020	QLD	https://www.cyjma.qld.gov.au/resources/dcsyw/about-us/reviews-inquiries/qld-gov-response/gov-annual-progress-report-child-abuse-2020.pdf
Government of South Australia's Response to the Final Report (2018)	SA	https://www.childprotection.sa.gov.au/_data/assets/pdf_file/0017/107306/royal-commission-sa-government-response.pdf

Appendix A

Table A1: Documents reviewed as part of the rapid review

Document Title	Jurisdiction	Source / Link
Royal Commission into Institutional Responses to Child Sexual Abuse: Government of South Australia 2019 Annual Report	SA	https://www.childprotection.sa.gov.au/_data/assets/pdf_file/0015/107304/royal-commission-annual-report.pdf
Royal Commission into Institutional Responses to Child Sexual Abuse 2020 Recommendation Status	SA	https://www.childprotection.sa.gov.au/department/royal-commissions-and-reviews/royal-commission-institutional-responses-child-sexual-abuse
Protecting our children: Implementing the Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse: First year Action Plan 2018-2019	TAS	https://nla.gov.au/nla.obj-2908980697/view
Tasmanian Government Second Annual Progress Report and Action Plan 2020	TAS	https://www.justice.tas.gov.au/_data/assets/pdf_file/0008/554849/Tasmanian-Government-Child-Abuse-Royal-Commission-Second-Annual-Progress-Report-and-Action-Plan-2020-FINAL.pdf
Tasmanian Government Third Annual Progress Report and Action Plan 2021	TAS	https://www.justice.tas.gov.au/_data/assets/pdf_file/0003/595425/Attachment-1-Third-Annual-Progress-Report-and-Action-Plan-2021.pdf
Victorian Government Annual Report 2018: Royal Commission into Institutional Responses to Child Sexual Abuse	VIC	https://www.vic.gov.au/victorian-government-response-royal-commission-institutional-responses-child-sexual-abuse
Victorian Government Annual Report 2019: Royal Commission into Institutional Responses to Child Sexual Abuse	VIC	https://www.vic.gov.au/victorian-government-response-royal-commission-institutional-responses-child-sexual-abuse
Victorian Government Annual Report 2020: Royal Commission into Institutional Responses to Child Sexual Abuse	VIC	https://www.vic.gov.au/victorian-government-response-royal-commission-institutional-responses-child-sexual-abuse
Royal Commission into Institutional Responses to Child Sexual Abuse: 2018 Progress Report	WA	https://www.wa.gov.au/sites/default/files/2019-04/Royal%20Commission%20Progress%20Report.pdf
Healing Past Hurts, Protecting Children Now, Preventing Further Harm: 2019 Progress Report - Implementing the Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse	WA	https://www.wa.gov.au/sites/default/files/2019-12/2019%20Royal%20Commission%20Progress%20Report.pdf
A Safer WA for Children and Young People: 2020 Progress Report	WA	https://www.wa.gov.au/government/publications/2020-progress-report-safer-wa-children-and-young-people
Annual Progress Report 2018	Commonwealth	https://www.childabuseroyalcommissionresponse.gov.au/annual-progress-reporting/australian-government-reports/2018-annual-progress-report
Annual Progress Report 2019	Commonwealth	https://www.childabuseroyalcommissionresponse.gov.au/sites/default/files/2019-12/annual_progress_report_2019.pdf
Annual Progress Report 2020	Commonwealth	https://www.childabuseroyalcommissionresponse.gov.au/sites/default/files/2020-12/annual-progress-report-2020.pdf

Appendix B

Recommendation 6.6: Institutions should be guided by the following core components when implementing the Child Safe Standards:

Standard 1: Child safety is embedded in institutional leadership, governance and culture

- a. The institution publicly commits to child safety and leaders champion a child safe culture.
- b. Child safety is a shared responsibility at all levels of the institution.
- c. Risk management strategies focus on preventing, identifying and mitigating risks to children.
- d. Staff and volunteers comply with a code of conduct that sets clear behavioural standards towards children.
- e. Staff and volunteers understand their obligations on information sharing and recordkeeping.

Standard 2: Children participate in decisions affecting them and are taken seriously

- a. Children are able to express their views and are provided opportunities to participate in decisions that affect their lives.
- b. The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and be less isolated.
- c. Children can access sexual abuse prevention programs and information.
- d. Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to communicate and raise their concerns.

Standard 3: Families and communities are informed and involved

- a. Families have the primary responsibility for the upbringing and development of their child and participate in decisions affecting their child.
- b. The institution engages in open, two-way communication with families and communities about its child safety approach and relevant information is accessible.
- c. Families and communities have a say in the institution's policies and practices.
- d. Families and communities are informed about the institution's operations and governance.

Standard 4: Equity is upheld and diverse needs are taken into account

- a. The institution actively anticipates children's diverse circumstances and responds effectively to those with additional vulnerabilities.
- b. All children have access to information, support and complaints processes.
- c. The institution pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds.

Appendix B

Standard 5: People working with children are suitable and supported

- a. Recruitment, including advertising and screening, emphasises child safety.
- b. Relevant staff and volunteers have Working With Children Checks.
- c. All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations.
- d. Supervision and people management have a child safety focus.

Standard 6: Processes to respond to complaints of child sexual abuse are child focused

- a. The institution has a child-focused complaint handling system that is understood by children, staff, volunteers and families.
- b. The institution has an effective complaint handling policy and procedure which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.
- c. Complaints are taken seriously, responded to promptly and thoroughly, and reporting, privacy and employment law obligations are met.

Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training

- a. Relevant staff and volunteers receive training on the nature and indicators of child maltreatment, particularly institutional child sexual abuse.
- b. Staff and volunteers receive training on the institution's child safe practices and child protection.
- c. Relevant staff and volunteers are supported to develop practical skills in protecting children and responding to disclosures.

Standard 8: Physical and online environments minimise the opportunity for abuse to occur

- a. Risks in the online and physical environments are identified and mitigated without compromising a child's right to privacy and healthy development.
- b. The online environment is used in accordance with the institution's code of conduct and relevant policies.

Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved

- a. The institution regularly reviews and improves child safe practices.
- b. The institution analyses complaints to identify causes and systemic failures to inform continuous improvement.

Standard 10: Policies and procedures document how the institution is child safe

- a. Policies and procedures address all Child Safe Standards.
- b. Policies and procedures are accessible and easy to understand.
- c. Best practice models and stakeholder consultation inform the development of policies and procedures.
- d. Leaders champion and model compliance with policies and procedures.
- e. Staff understand and implement the policies and procedures.

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