

## Child Wise's submission to the Childcare & Early Childhood Learning Productivity Commission Review

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### Who we are

Established in 1991, Child Wise is one of Australia's leading not-for-profit child sexual abuse prevention organisations. Our vision is of a society in which children can grow up free from child sexual abuse and exploitation. We work to build awareness, deliver education, and provide the tools to empower individuals and communities around Australia so they can actively prevent child sexual abuse and exploitation.

### Our approach to early education and care

Child Wise believes that the first priority when considering childcare and early childhood learning should not be the workforce participation needs of families, but the right of children to be safe, supported, and nurtured.

The *Royal Commission into Institutional Responses to Child Sexual Abuse* has highlighted the risk that child abuse or neglect may occur in the institutional and organisational setting. In particular, the YMCA Case Study illustrates how childcare services can be a place where child sex offenders seek to access and abuse children – it seems clear that the lack of regulations, training, and qualifications, in addition to poor policies and procedures, allowed the predations by Jonathan Lord to take place.

The *Childcare and Early Childhood Learning Productivity Commission Issue Paper* provides no clear mechanism to consider how childcare and early childhood learning may be made 'child safe'. The National Quality Framework (NQF) goes some way to requiring an understanding of the risks to children, but should be expanded to cover the needs of children's safety. Our submission to the Royal Commission discusses how organisations can be made child safe in some depth. It can be accessed at:

<http://www.childwise.net/page/9/royal-commission>

There are aspects of this *Issue Paper* that address functions and service provision in childcare and early childhood learning, but do not specifically request comments as to their impact on children. In consideration of Child Wise's expertise and scope of activities, this submission will largely focus on the requirement to consider the safety and wellbeing of children.

## **Our engagement with service providers**

We have conducted training for staff and parents involved in the early childhood and childcare industries, in part due to increased requirements of the NQF. It is important to note that our training programs extend beyond the obligations of service providers. Anecdotally, it is Child Wise's experience that those seeking our training do so for three reasons:

1. To fulfil the requirements of the NQF;
2. To safeguard the service provider's reputation and that of their staff by gaining additional skills;
3. In recognition of the risks and dangers inherent in working with children, and their vulnerability to abuse and neglect, and the ethical responsibility to protect children in their care.

In Child Wise's opinion, it is the third of these motivators that is the most valuable, and the strongest argument for improved training and awareness programs. Service providers that do seek out additional training, for child abuse prevention and intervention, and other fields related to childcare, should be commended. In Child Wise's experience, this only adds to their ability to care for children, despite the extra efforts and costs involved for staff and providers.

## **The 12 Standards for a Child Safe Organisation**

The silence and secrecy that traditionally surrounds public discussion of child sexual abuse is also what allows it to continue – organisations which are closed, secretive, and are not transparent provide the environment for child sex offenders to operate. The lack of understanding, of knowledge, and of awareness around child sexual abuse leads to a culture of fear and denial, where offenders and groomers can exploit uncertainties and access vulnerable children.

Child Wise established the '12 Standards for a Child Safe Organisation' (the Standards) to create a framework for building open, transparent, and accountable organisations. If fully adopted, the Standards will act to combat those barriers to establishing a child safe organisation – fear, denial, a lack of resources, complacency, and an entrenched culture.

The Standards employ situational crime prevention tools to create environments that are 'child safe' – the aim of a 'child safe organisation' should be to create a culture and environment where abuse is unable to take place. The Standards aim to prevent, minimise, and end child abuse in an organisational and institutional context.

Recognising that there is no fool-proof system for the complete prevention of all forms of abuse, the Standards incorporate elements of public health interventions to prevent the abuse of children, minimise the risk of abuse by heightening the likelihood that abuse will be detected, and to reduce the long term impacts of abuse on children.

### **The 12 Standards**

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| 1 An Open & Aware Culture                | 7 Screening of Representatives       |
| 2 Understanding Child Abuse              | 8 Support & Supervision              |
| 3 Managing Risk to Minimise Abuse        | 9 Empowering Children & Young People |
| 4 Child Protection Policies & Procedures | 10 Training & Education              |
| 5 Clear Boundaries                       | 11 Complaints & Disclosures          |
| 6 Recruitment & Selection                | 12 Legal Responsibilities            |

### **‘Child Safe’ childcare and early childhood learning**

The importance of creating child safe organisations within childcare and early childhood learning cannot be overstated. It will positively contribute to children’s wellbeing and development, and if appropriate safeguards are put in place, in line with the 12 Standards for a Child Safe Organisation, child abuse within an organisation can be prevented.

Additionally, by lowering the risk and incidence of abuse, neglect, injury, and maltreatment of children both within the organisation, and externally through identification of abused or ‘at risk’ children, the broader costs of child abuse to society will be reduced.

It has been estimated that child abuse and neglect cost the Australian economy up to \$30 billion per year in healthcare, policing and service provision, and productivity losses (Access Economics, 2008). Staff at childcare and early childhood learning service providers are uniquely positioned to both recognise the signs and indicators of child abuse, and to initiate interventions to reduce

the impact and trauma on the child. By reporting suspected cases of abuse, or vulnerable or 'at risk' children, to child protection authorities or the police, steps may be taken to end or prevent their abuse.

## **Organisational setting vs. home based care models**

Childcare and early childhood learning are, on the whole, conducted within an organisational setting, where staff can be monitored and supervised, in line with the 12 Standards. However, there are some 'home based care' providers operating within Australia, and the Issues Paper ask respondents to consider international models of care, including that of home based care in New Zealand.

Child Wise does not wish to comment on the specifics of any one model of home based care. However, there are several aspects to any form of home based care which may place children at greater risk of abuse or neglect, most of which stem from the differences between an organisational structure and a home environment.

There is a need to ensure that all forms of care for children are 'child safe' – there must be effective safeguards for both facility-based and home-based care. The '12 Standards for a Child Safe Organisation' (the Standards) are easiest to implement within a traditional organisations; that is to say, facility-based interactions with children, or organisations with defined activities and contact with children, such as childcare or after school care facilities. Yet when considering home-based care, the structures of a facility-based organisation are not present. Nonetheless, home-based care should be subject to the same rigorous and thorough assessments and requirements as any other organisation that works with children.

Care must be taken not to raise the barriers for entry to people wanting to begin home based care so high that they are discouraged from welcoming children into their home; equally children deserve adequate safeguards and the thorough assessment of potential home based care options.

The safeguarding of children must be founded on an organisational commitment to a set of values that have the wellbeing of children at their heart. These values, and the supporting systems and processes that reinforce them, must be clear and visible, implemented with defined methods, and subject to ongoing monitoring and review. When this fails to occur, all models of care are vulnerable to a 'corruption of care'.

To improve the safety of children in all models of childcare and early childhood learning will require extra resources and funding, and a willingness to develop new and comprehensive regulatory systems. Additionally, child protection intervention and reporting systems must be harmonised across all States and Territories. Only when this commitment is made will childcare and early childhood learning systems be able to become 'child safe'.

### **Situational setting**

The benefits of home based care models are obvious – they reduce the overheads of an organisation, where dedicated buildings are not required to provide similar services. However, home based care may be at greater risk given the diffuse nature of service provision and structures – an organisation based care model requires policies, procedures, and is better equipped to provide supervision and support of staff.

In home based care, these safeguards and structures become difficult to enforce, often with far higher costs. Home based care is a model worth exploring, but the efficiencies inherent in an organisational structure for providing child safe spaces are difficult to replicate in the home.

### **Youth on youth child abuse**

Victoria police suggest that up to 9-16.2% of child sexual abuse is perpetrated by another child or young person. Other estimates place the overall level of child abuse (physical or sexual, primarily) perpetrated by another child or young person at between 30-40%. A child in childcare may abuse another, and in home based care, there is the risk that a carer's child is not adequately screened or supervised, and may abuse other children. Child Wise has supported and advised a number of organisations where incidents such as these have occurred (all of which were referred to the police or child protection).

### **Training and supervision of staff/carers**

Organisations are better resourced and equipped to ensure staff and carers are trained, qualified, and receive regular skills updates, with cost efficiencies in holding group trainings and enough staff to cover shifts while attending training. It is harder to manage similar levels of training and support for home based care models.

One of the key pillars of a child safe organisation is the support and supervision offered to staff. If a staff member or volunteer has exhibited

troubling or inappropriate behaviour, the oversight provided by having multiple staff and managers can help to address these shortcomings, and, if serious, report such behaviour to the authorities.

It also allows for additional supervision of children – identifying troubling or sexualised behaviours, and then acting to limit or intervene in them. In the home based care environment, this, while not impossible, becomes harder and less cost effective.

In short, while alternative methods and models of care should be explored, it is important to ensure that standards and quality of care are maintained and improved upon. The NQF should be expanded to include provisions for child safe organisations and training, and must be used to cover all models of care for childcare and early childhood learning.

## **National Quality Framework**

The NQF, as discussed above, should be expanded to cover the requirements for a child safe organisation. This includes the training requirements of childcare and early childhood workers.

Training should be expert, appropriate training from external organisations (where required). It should be regularly conducted to ensure representatives have relevant skills. The following is excerpted from Child Wise's *Issues Paper 3 – Child Safe Organisations* submission to the Royal Commission.

Higgins argues that 'regular and updated training on child maltreatment matters ensures the topic is discussed regularly and that staff members have the most current information available. It also encourages regular open discussion of any staff concerns and can contribute to an environment that supports early disclosure of abuse' (2001). This is supported by Goddard, who says that 'there should be regular training for those who work in education, day care, and so on' – essentially, all those who work with children (2012).

The National Society for the Prevention of Cruelty to Children in the UK (NSPCC) identifies that training all staff will 'help to alleviate the problems of reporting and investigating child abuse and neglect in residential settings' (1991). They also make the case of the importance for 'workers from different agencies being involved in joint training to provide the opportunity to discuss issues of common concern' (NSPCC, 1998).

The Centre for Disease Control in the U.S. believes that 'training content should be evident in performance measures, supervisors' feedback to employees/ volunteers, caregivers' observations, and treatment of youth' within each organisation (2007). Kleinpeter et al. conducted an investigation into social workers in the U.S. and found that increased training for child welfare supervisors improved their competency in dealing with both supervision, and complex cases of child welfare (2003).

The Office of the Child Safety Commissioner in Victoria (now the Commission for Children and Young People) notes that 'child-safe organisations [should] emphasise and implement training opportunities and strategies that equip people to do their job well', and that there should be regular training in specific areas (2007).

Child Wise has been conducting training in child safe organisations through the award winning 'Choose With Care®' model for nearly 15 years. It is our experience that such training, while highly effective in the short term in increasing vigilance and improving organisational capacity in responding to child abuse, requires regular 'refresher' training to have a long-term effect. Feedback from organisations has been routinely positive.

There have been a number of occasions where our training has directly led an organisation's representatives to identify child sex offenders operating through their programs. Our training helped these organisations to develop an open and aware culture, and in this environment a greater understanding of child abuse allowed representatives to identify grooming and abusive behaviours. As a result, they were supported and felt empowered to raise their concerns and expect action to be taken.

## **Sector self-regulatory codes of practice or accreditation schemes**

Sector self-compliance cannot work without oversight, for compliance and reporting is reliant on organisational cultures. External standards and regulation will help to develop a positive compliance culture, as will a no-fault approach to reporting centrally. Yet enforcement and external monitoring is required to reinforce this culture, as it will ensure resistant organisations improve their systems and management styles will become more open and accountable.

**Child Wise thanks the Productivity Commission for the opportunity to provide a submission.**



## References

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