



9 February 2022

Ms Megan Graham
A/g Head
National Office of Child Safety
Department of Prime Minister and Cabinet
Via email to: nationalofficeforchildsafety@pmc.gov.au

Dear Megan,

Submission – Advisory Group for National Strategy to Prevent and Respond to Child Sexual Abuse

In my capacity as ACT Children and Young People Commissioner, I would like to thank you for the opportunity to provide a submission on the establishment of the Advisory Group for the National Strategy to prevent and response to child sexual abuse.

Initially, I would like to acknowledge the work of your office in resourcing and developing child and youth friendly communications. This approach should be a fundamental part of all our communication and engagement strategies moving forward and it is encouraging to see this being evidenced at a national level.

The core focus of my submission centres on the need for the inclusion and participation of children and young people at all levels of the National Strategy and the importance of recognising children and young people as key stakeholders and subject matter experts.

The proposed model of the National Strategy Advisory Group (the Group) and any criteria for selecting membership

- To ensure appropriate stakeholder representation, a young person representative should be recruited to the Group.
- Additionally, the Group should also include an advocate for children and young person to ensure a focus on the rights, interests, views and experiences of children and young people. This advocate should be someone who not only has a specialised and extensive understanding of the specific needs of this cohort (i.e., children and young people victims and survivors) but who also has a demonstrated understanding of the nuances and diversity that exist within the broad 'community' of children and young people. The advocate's input will complement the views that service provider representatives, who should also be included, will bring to the Group's discussion and consideration of relevant issues.
- In addition to a young person representative on the Group itself, consideration should be given to establishing a separate group (or process) to enable direct engagement with and participation by children and young people. A representative from this group could become the young person representative on the Group itself.

What should be included in the terms of reference for the Advisory Group

- The role of the Group should be clearly positioned as having an ongoing oversight function to ensure accountability for implementation of the National Strategy. While the importance of the Group's advisory capacity is obviously important, the Group should also be funded to provide oversight in such a way that enables it to examine and independently report on whether the deliverables of the National Strategy have been met.

- Adequate support services must be resourced. While it is understood that the Department of Social Services provides specialised funded support services for victims and survivors, it will be important to recognise that similar support services are likely to be necessary to ensure the safe participation of victims and survivors on the Group. The focus here being on the specific supports that might be required as opposed to a generic referral pathway. This should include accessible and ongoing support services, providing onsite support for any face-to-face meetings, and appropriate supports (whether online or otherwise) for any online meetings.
- Provisions should also be made for adequate resources to enable purpose-driven consultations, cohort-specific feedback mechanisms and accessible evaluation and oversight models. Additionally, there should be resources allocated to in-person support for face-to-face meetings (e.g., travel costs and allowances for the person as well as for their support people, assistance animals, etc).
- A commitment to meaningful engagement with children and young people (and an associated deliverable) should be a key component of the terms of reference. This should include seeking and providing feedback (including through direct consultation) and analysis/evaluation of the strategy by children and young people at planned intervals. As key stakeholders, participation by and engagement with children and young people should contribute to the Group's oversight functions.
- It would be beneficial to detail a clear decision-making model that articulates the points at which and how children and young people will be able to directly influence or be able to advocate for issues they consider to be relevant to implementation of the National Strategy.

If you are a victim or survivor, or an advocate, what additional alternative ways for engagement and partnering with us would you like to see established? For example, would a separate, dedicated victim-survivor advisory group be beneficial?

- As per above, the processes and outcomes for stakeholder engagement should be as accessible and inclusive as possible. In designing these processes, there should be a focus on approaches that are co-designed, place-based, or mobilised through other platforms suggested/requested by key stakeholders.
- As suggested above, ideally consideration should be given to establishing a separate advisory group while also including a young person representative on the Group itself. However, there should also be other options available to enable participation and engagement by children and young people. This could include digital engagement and platforms, connecting individually or through their advocates, or providing for children and young people to submit their views using creative mediums such as artwork, videos, poetry, written submissions, audio recordings (to name just a few).
- Again, having adequately resourced support services is essential, as is the recruitment of practitioners who are appropriately skilled in engaging directly with this cohort.

Whether other priority groups, such as people with disability, should be engaged in additional alternative ways

- As per previous comments, the Group needs to be as open and accessible as possible.
- To this end, ideally all processes should be co-designed with the cohort groups to be engaged to ensure as far as possible that the approaches being used are appropriate to their specific needs.
- As evidenced in research, it is important to acknowledge that several cohorts within our community are more vulnerable to becoming (or are already) victims or survivors of child sexual abuse. Further, while it is important to ensure the views of children and young people contribute to these processes, it is essential to ensure a diverse range of backgrounds and experiences. This will require a focus on developing mechanisms that enable input from children and young people with a disability, LGBTQI, Aboriginal and Torres Strait Islander children and young people, children and young people who are culturally and linguistically diverse, and children and young people who have lived experiences of child protection, out-of-home care, and youth justice systems.

- Consideration should also be given to how best to engage with the experiences of children and young people who have harmful sexualised behaviours to ensure wholistic coverage of the subject matter. Doing so will similarly require skilled practitioners or services to assist with the design, engagement, and oversight of these processes.
- To reiterate a point made previously, meaningful engagement of and consultation with children and young people is a specialised skill set. To this end, any undertaking of this nature needs to be performed by appropriately skilled practitioners. Further, and as also stated previously, appropriate supports need to be established to ensure the safety and wellbeing of participants and Group members, facilitators, and anyone else involved in these processes.

The establishment of the proposed stakeholder consultation list

- When developing mechanisms for providing feedback (e.g., calls for submissions) or providing consultation and/or participation opportunities, the method should be children and young people friendly as well as developmentally and culturally appropriate.

While the need to create a diverse and cohesive Advisory Group is recognised, all too often the experience of children and young people is one of feeling excluded. The vulnerabilities and sensitivities when engaging with this cohort are real and profound and while they require additional planning and deliberate strategising that can be time-intensive, the inclusion of their views and perspectives invariably leads to improved policy and practice outcomes.

Should you require further information, please do not hesitate to contact my office by calling 02 6205 2222 or emailing ACTKids@act.gov.au. Ms Lisa Fenn (lisa.fenn@act.gov.au) is the relevant contact in my office should you or your staff wish to set up a meeting to discuss these matters.

Kind Regards,



Jodie Griffiths-Cook
Public Advocate and Children and Young People Commissioner
ACT Human Rights Commission