Child Safety Annual Reporting Framework: Consultation Paper

PeakCare's Submission to the National Office for Child Safety

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INTRODUCTION

PeakCare welcomes the opportunity to provide feedback on the proposed Child Safety Annual Reporting Framework. As the peak body representing child and family services in Queensland, we recognise the importance of strengthening accountability, promoting transparency, and embedding child-safe principles across all sectors. This submission reflects insights from sector organisations and contributions from our member agencies. Our response highlights both the strengths of the proposed framework and areas for refinement to ensure it effectively supports organisations in safeguarding children and young people.

ABOUT PEAKCARE

PeakCare is a not-for-profit peak body for child and family services in Queensland, providing an independent voice representing and promoting matters of interest to the non-government sector. Across Queensland, PeakCare has almost 100 members including small, medium and large, local, state-wide and national non-government organisations which provide prevention and early intervention, generic, targeted, and intensive family support to children, young people, families, and communities. Member organisations also provide child protection services, foster care, kinship care and residential care for children and young people who are at risk of entry to, or who are in the statutory child protection system and youth justice systems. A large network of associate members and supporters also subscribe to PeakCare. This includes individuals with an interest in child protection, youth justice and related services, and who are supportive of PeakCare's policy platform around the rights and entitlements of children, young people and their families to safety, wellbeing and equitable access to life opportunities.

PEAKCARE'S SUBMISSION

Is your organisation supportive of the proposed model for the child safety annual reporting framework?

PeakCare is supportive of the proposed child safety annual reporting framework and its objectives. We commend the National Office for its strategic approach in developing a framework that prioritises capability building, transparency and alignment with existing regulatory mechanisms.

The proposed framework's voluntary nature provides organisations with flexibility and encourages broad participation across sectors. This inclusivity aligns with the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse, which emphasised the need for systemic improvements at institutional and societal levels. Specifically, the Royal Commission highlighted the importance of strengthening accountability within organisations, encouraging child-safe organisations, and addressing gaps in systems and services that support vulnerable children, particularly in marginalised communities. By targeting a wide range of sectors, the framework aims to address these systemic gaps and embed child safety principles across all areas of society.

Some concerns remain regarding the lack of clarity on the specific data and reporting requirements. Organisations already subject to extensive state-based regulatory reporting may experience compliance burdens if the framework does not adequately align with existing obligations. To ensure the model's success, clear guidelines on reporting expectations, strong communication across regulatory bodies, and mechanisms to minimise duplication of effort should be established.

Would the proposed model assist in developing and strengthening your organisation's existing reporting requirements?

The proposed framework is likely to enhance organisations existing child safety reporting processes as it aligns with state-based Child Safe Standards regulatory requirements ensures consistency while minimising administrative duplication. Components such as capability-building resources, self-publishing mechanisms, and the establishment of a support network are particularly valuable as they provide organisations with practical tools to refine their child safety practices and encourage continuous improvement.

Concerns remain regarding differences in interpretation across jurisdictions, which have previously led to unnecessary back-and-forth between government regulatory bodies and funded service providers. PeakCare recommends consideration be given to a centralised national reporting system that harmonises requirements across states and territories, allowing organisations to demonstrate compliance with existing frameworks as sufficient evidence of adherence to national standards.

Would any key features of the proposed model help your organisation in building its child safety capability?

Several features of the proposed model align would significantly enhance our member organisation's child safety capability:

- *Support Network:* The establishment of a network for sharing good practices will facilitate knowledge exchange and encourage collaboration across sectors. This is particularly beneficial for addressing sector specific challenges and developing innovative approaches to child safety.

- *Resources and Guidance:* Tailored templates, training programs and culturally appropriate resources will simplify the adoption process and enhance understanding of the National Principles. This is especially important for engaging priority groups and ensuring culturally safe practices.

- *Public Commitment Mechanism:* The opportunity for organisations to publicly commit to the framework and be listed on a national register enhances accountability and promotes public trust.

Would any key features of the proposed model not be useful for your organisation?

While the framework is well considered, there are areas where further refinement could enhance its utility:

- *Feedback Mechanism:* The current lack of a formalised feedback mechanism may limit opportunities for organisations to receive actionable insights. PeakCare recommends the development of a structured system to provide constructive feedback and support continuous improvement in child safety practices.

- *Compliance Burden and Duplication:* Member organisations have raised concerns regarding potential duplication of compliance efforts, particularly for those already reporting under state-based schemes. Efforts should be made to align national reporting requirements with existing obligations to avoid unnecessary administrative burdens.

Are there any other features not mentioned in the proposed model that would be useful for your organisation?

PeakCare recommends the inclusion of the following enhancements to strengthen the framework:

- *Regular Evaluation and Monitoring:* Introducing a robust evaluation framework to assess the framework's effectiveness in improving child safety practices across participating organisations. This would provide valuable data to inform future enhancements and policy development.

- *Priority Group Engagement:* Strengthening engagement with priority groups, including children and young people, Aboriginal and Torres Strait Islander communities, and people with disabilities. Codesigning resources with these groups would ensure relevance, accessibility, and cultural safety.

- *Recognition Programs:* Establishing recognition programs for organisations demonstrating exemplary child safety practices under the framework could incentivise participation and foster a culture of excellence.

- *Integration with State-Based Reporting:* Allowing organisations to upload compliance statements or annual reports required by state-based schemes to fulfil national reporting obligations, reducing duplication and administrative effort.

- *More Training for Practitioners and Families:* As suggested by multiple service provider in Queensland, additional training would be significantly beneficial for those working with children and adults who have experienced abuse and may be at risk of perpetrating harm. More support, information and training would also be beneficial for families in better understanding child safety principles beyond general 'stranger danger' knowledge.

CONCLUSION

PeakCare commends the National Office for its leadership in advancing child safety initiatives. The proposed framework's broad scope, emphasis on capability building, and voluntary nature represent significant progress in creating safer environments for children and young people.

To maximise the framework's impact, it is essential to ensure adequate resourcing and support for smaller organisations and those operating in rural and remote areas. We encourage the National Office to continue engaging with stakeholders to refine the framework and address emerging challenges in child safety.

PeakCare is supportive of the proposed Child Safety Annual Reporting Framework and its potential to drive meaningful improvements in child safety practices across Australia. We look forward to ongoing collaboration with the National Office to support the framework's implementation and achieve its vision of safer environments for all children.

Yours sincerely,

Tom Allsop
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