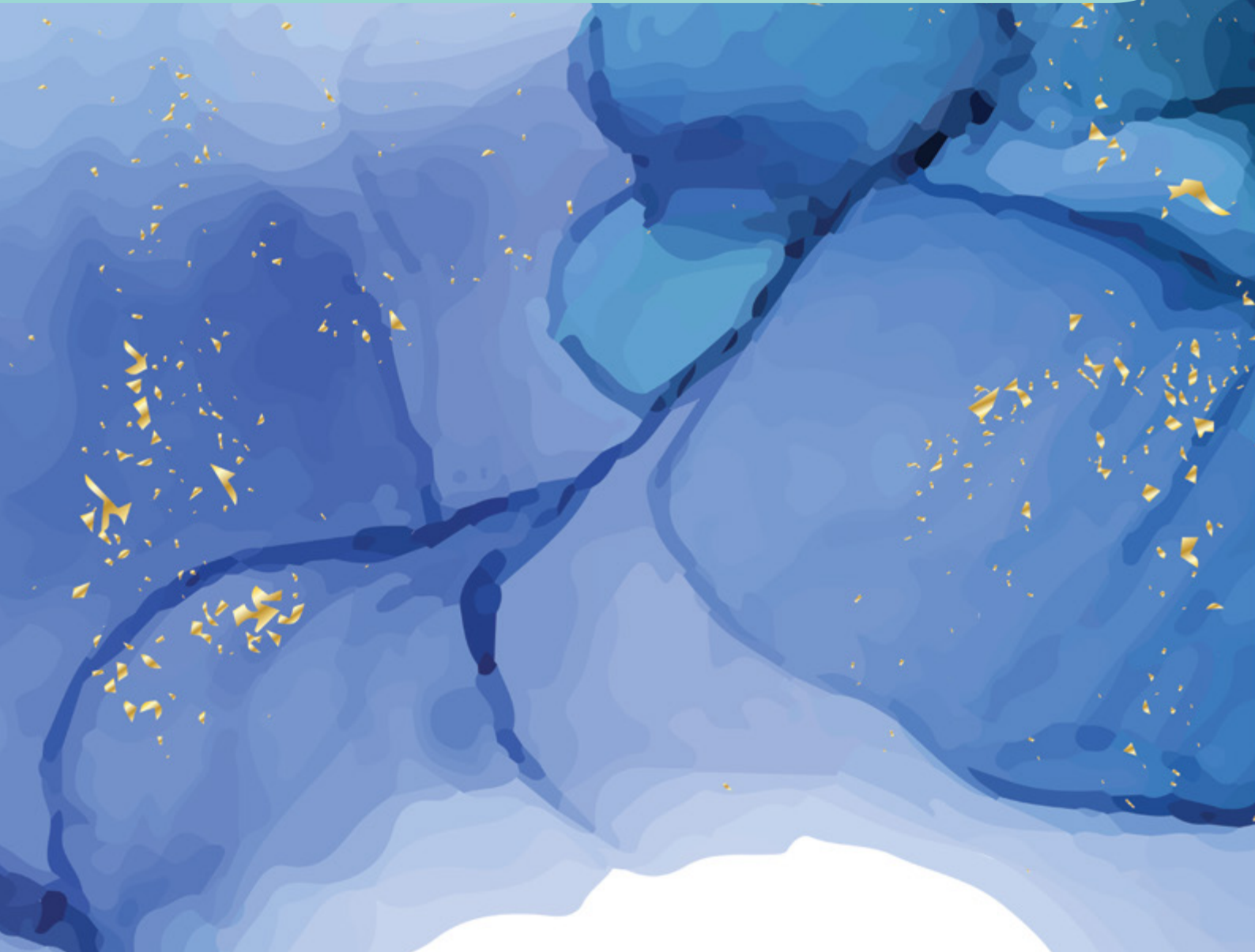# National Principles for Child Safe Organisations

Community Sector Organisations Consultation Report

Contents

Executive Summary

The recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) emphasised that organisations working with children must provide safe environments where the rights, needs and interests of children are met.

There are approximately 25,000 organisations across Western Australia (WA) that engage with children and young people, including a significant number of community service organisations. All of these organisations will be required to implement the National Principles for Child Safe Organisations (National Principles) in response to recommendations made by the Royal Commission. Child safe organisations create cultures, adopt strategies and take action to prevent harm to children, including child sexual abuse.

In early 2020, the Department of Communities (Communities) supported by the Western Australian Council of Social Service (WACOSS) commenced a two phased consultation project. The first phase of the consultation involved an online survey to consult with community service organisations across WA on the implementation of the National Principles, with the second phase engaging community sector organisations through targeted focus group discussions.

The survey undertaken during phase one of the consultation aimed to assess the readiness, capacity, and progress of community service organisations in implementing the National Principles into the governance and functions of their organisations. The information gathered from the survey provides a context for the possible challenges that will need to be addressed to ensure the timely and effective implementation of the National Principles in preparation for a system of independent oversight. This phase was finalised in December 2020 and the key findings are documented in this report. Phase two of the consultation involved a series of focus groups with targeted community service organisations, aimed at building on the information provided through the survey in terms of progress and capacity to implement the National Principles (including the impact of COVID-19) and opportunities and solutions for government and the community services sector to progress implementation. These findings are also included in this report.

The key themes identified across the consultation were:

- There is a strong commitment from the sector to implement the National Principles. Most participants expressed a desire and willingness to work together to create a community that is safer and friendlier for children, young people and families.

- Progress and capacity to implement the National Principles is highest around principles that relate to staffing, policy, and process change. Less capacity and progress was reported around principles that focus on engaging and informing families and children.

- The COVID-19 pandemic caused major service disruptions and had a negative impact on implementation of the principles.

- Much can be achieved by pooling resources, reducing duplication, sharing learnings and building communities of practice. Areas of potential sharing and collaboration include resources, online training modules, template policies, checklists and templates.

- Policies, practice guides and other resources should be developed through a central forum (e.g; peak bodies or Commissioner for Children and Young People) that is resourced and endorsed by government.

- A coordinated approach to training that meshes across standards and principles (to prevent duplication) and is tailored for a range of experience levels and roles is needed.

- There should be consistency in approach, expectations, and communications across government bodies. Government service providers should demonstrate best practice and operate in a way that supports the community sector to implement the National Principles.

- Ways to simplify accreditation and regulatory schemes to reduce duplication and increase the ease of compliance should be investigated.

- There is a support for a common framework for implementation and a medium to long term implementation plan that allows for incremental development. A staged roll-out could help prioritise those organisations at greatest risk and who need the most assistance including smaller and regional organisations.

- Independent oversight and a supportive, continuous improvement approach is welcomed, rather than one that is punitive.

1. Background

1.1   What is a child safe organisation?

A child safe organisation is one that puts the best interests of children or young people first, and consciously and systematically:

- creates an environment where children's safety and wellbeing is at the centre of thought, values and actions;
- places emphasis on genuine engagement with and valuing of children and young people;
- creates conditions that reduce the likelihood of harm to children and young people;
- creates conditions that increase the likelihood of identifying any harm; and
- responds to any concerns, disclosures, allegations or suspicions of harm[1].

1.2   Why do we need child safe organisations?

The recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission) emphasised that organisations working with children must be able to provide safe environments where the rights, needs and interests of children are met.

The Royal Commission's Final Report recommended a range of mechanisms to make institutions child safe including ten Child Safe Standards (rec 6.5), direction about which organisations the standards should apply to (rec 6.9) and the role of an independent oversight body to monitor and enforce the standards (rec 6.10 and 6.11).

The Royal Commission proposed a regulatory approach that utilised a range of levers to support or facilitate child safe organisations, such as funding agreements and existing regulatory and legislative frameworks.

The Royal Commission also envisioned that the National Office for Child Safety (rec. 6.16 and 6.17) would have a key role in collaborating with the Commonwealth, state and territory governments to support national consistency. It would do this by leading capacity building, continuous improvement of child safe initiatives through development of resources, best practice materials and evaluation. They also expected the National Office for Child Safety to promote participation and empowerment of children and young people.

1.3   Why do we have principles not standards?

In February 2019, the Council of Australian Governments endorsed the National Principles for Child Safe Organisations (National Principles).

The National Principles give effect to the ten Child Safe Standards, with a broader scope that goes beyond child sexual abuse to cover other forms of abuse or potential harm to children. They are underpinned by a child-rights approach to build capacity and to deliver child safety and wellbeing in organisations, families and communities.

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1   https://childsafe.humanrights.gov.au/about/what-child-safe-organisation

1.4   What is happening in Western Australia to support implementation?

In Western Australia (WA) the recommendations are being led by Department of Communities (Communities) and Department of the Premier and Cabinet (DPC) in partnership with key government agencies and the Commissioner for Children and Young People (CCYP).

Communities are leading implementation of the National Principles through a range of administrative and legislative levers and existing regulatory frameworks. This approach supports preparation for introduction of independent oversight and complements the role of the National Office for Child Safety to create cultural change through capacity building.

The Department of the Premier and Cabinet (DPC) is leading the development of advice to the State Government on an independent oversight system, which will include the monitoring and enforcement of the National Principles for organisations engaged in child-related work.

Key State Government agencies have begun work to build the capacity of their agency and organisations in their sector to be child safe through:

- WA focused consultation with the community sector to assess their readiness, capacity and progress towards implementation of the National Principles;
- consulting with the local government sector on the establishment of child safety officers as recommended by the Royal Commission (rec 6.12);
- developing a whole of government risk plan against the National Principles;
- exploring options for the use of contract management to build capacity of funded services; and
- developing child safe resources and training to support implementation of the National Principles.

A new priority area *Building capacity and capability to implement the National Principles* has been referred to the Supporting Communities Forum to address for the remainder of its term, ending on 31 December 2022. The Forum is an initiative to build collaborative partnerships between State Government and the community services sector.

This priority area supports the Royal Commission's recommendations relating to the implementation, monitoring, oversight, and enforcement of National Principles. The Child Safe Organisations Working Group (Working Group), comprising relevant stakeholders from government and the community services sector, has been established to progress the priority area.
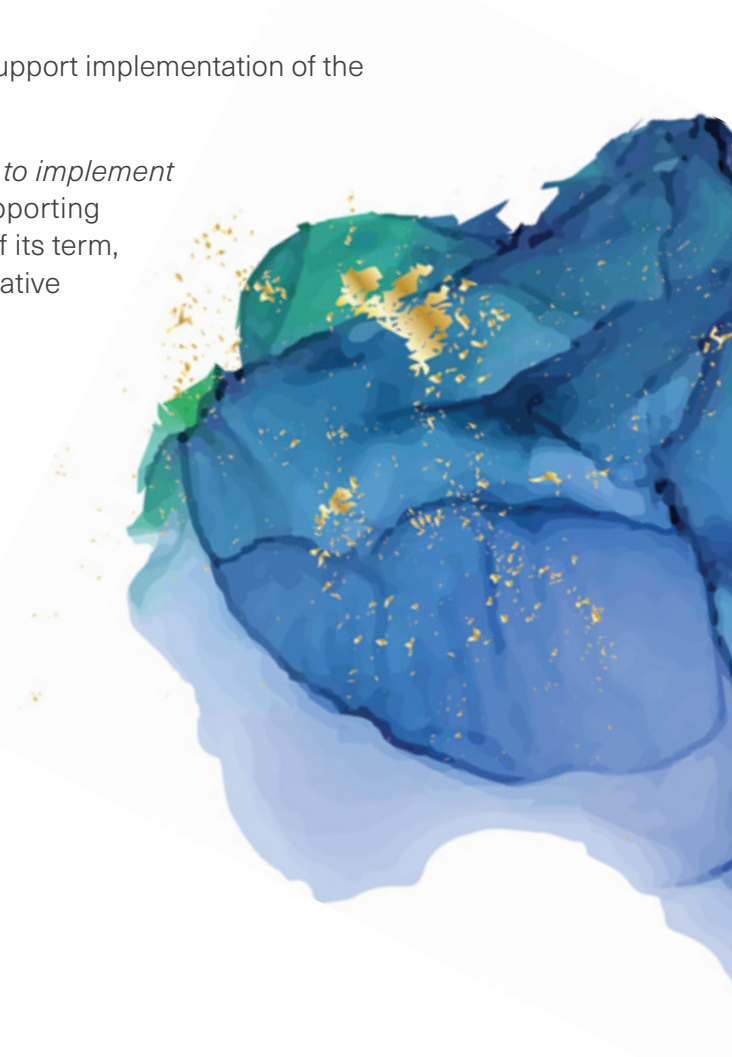
1.5 How does this work support the existing child safe functions of the Commissioner for Children and Young People?

WA currently has a voluntary approach to the implementation of National Principles focused on capacity building, led by CCYP, while options for legally requiring implementation are developed. CCYP promotes and supports the implementation of child safe principles and practices in organisations in WA and consults with children on issues relating to child wellbeing.

Since it was established in 2010, the office of the CCYP in WA have undertaken child safe capacity building work in relation to the rights of children to participate and be heard and child friendly complaints handling. From 2015, CCYP has published resources that provide guidance on how organisations can implement strategies to strengthen their organisational leadership and governance and create a tangible culture of safety for children. CCYP has also delivered training for organisations on how to promote and implement child safe practices within their organisation.

From 2019, CCYP have been revising their child safe resources to align with the National Principles including producing a suite of resources, in partnership with the National Office for Child Safety, to support children and young people speak up and make a complaint.

1.6 What is the Australia Government doing to support implementation?

The National Office for Child Safety was established on 1 July 2018 and leads the development of national priorities recommended by the Royal Commission, including National Principles, Australian Government child safe policies (Commonwealth Child Safe Framework), a National Strategy to Prevent and Respond to Child Sexual Abuse and information to improve child safety.

The Australian Government has implemented the Commonwealth Child Safe Framework (Second Edition), a whole of government policy that sets minimum standards for creating and embedding a child safe culture and practice in Commonwealth entities. The Framework comprises four core requirements, which set minimum standards for Commonwealth entities, by requiring them to:

1. Undertake risk assessments annually in relation to their activities, to identify the level of responsibility for, and contact with, children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks.

2. Establish and maintain a system of training and compliance to make staff aware of and compliant with the Framework and relevant legislation, including Working with Children Checks and mandatory reporting requirements.

3. Adopt and implement the National Principles.

4. Publish an annual statement of compliance with the Framework.

An optional Implementation Self-Assessment Checklist is also available to assist entities to implement the Framework. Commonwealth entities have placed the same requirements, to promote the protection of children, in services and activities they fund.

A nationally consistent approach to the implementation of the National Principles will allow children and their families to expect a comparable and appropriate level of safety within institutions regardless of which jurisdiction they are in and provides consistency for WA organisations operating across state boundaries.

2. Consultation Report

To inform the appropriate and effective implementation, it is useful to understand the community service sector's level of awareness, capacity, and progress in implementing the National Principles into the governance and functions of their organisations.

This consultation provided an overview of progress, including challenges and opportunities. The consultation also explored the impact that COVID-19 has had on the sector, including organisational capacity, priorities, and ability to implement the National Principles. It also provided an opportunity to educate the sector on the recommendations of the Royal Commission, National Principles, and link participants to other child safe resources.

The project was led by Communities, with support from the Western Australian Council of Social Service (WACOSS) and was undertaken in two phases:

- **Phase One:** an online survey with community services sector stakeholders on the implementation of the National Principles; and
- **Phase Two:** a series of focus groups with targeted community services sector stakeholders and informed by the results of the survey.

This report provides a comprehensive overview and analysis of the findings from both phases of the consultation and is intended to inform implementation requirements for the State Government and the WA community services sector.

2.1   Aims and objectives

The aims of the consultation were to;

- determine the understanding, capacity, and current progress of community sector organisations in making changes to culture and practice as outlined by the National Principles; and
- to identify arising challenges and barriers for organisations in implementing National Principles and highlight opportunities and examples of best practice.

2.2   Target Audience

The consultation targeted community service organisations in WA that are engaged in child-related work and specified by the Royal Commission as an institution that should be required by legislation to comply with the National Principles. To recognise the various roles and experience of staff across these organisations, multiple people within the organisation were invited to complete the survey and attend the focus groups discussions.

2.3   Consultation Methods

Consultation was carried out over an 18 month period, with Phase One commencing in January 2020. An online survey was distributed that aimed to identify the level of understanding, capacity, and current progress of community services across WA in making any necessary changes to organisational culture and practice to implement the National Principles.

The survey was open from 13 January 2020 to 7 February 2020, accessible online via an electronic link or by hard copy on request. WACOSS, YACWA and key government agencies promoted the survey to organisations engaged in child-related work in WA through various communication mechanisms, including direct letters to funded services identified as agency websites and member organisation newsletters. Participation in the survey was voluntary.

The survey yielded 266 responses, with individuals asked to express their interest in attending the Phase Two focus groups to further explore and elaborate on findings from the survey. It was intended that the focus groups would be held soon after the survey, however there was a significant shift in priorities for both State Government and the sector in response to the COVID-19 pandemic in 2020.

A draft report summarising the key survey findings, developed in December 2020, was used to inform key issues for discussion in Phase Two. In May 2021, the survey respondents who had expressed an interest in attending the focus groups were invited to participate in some planned sessions, while WACOSS and Communities jointly approached other community sector organisations to seek participation.

Three focus groups were held from 15 June to 24 June 2021, with 29 participants across three groups.

2.4   Survey Structure

The survey was developed by Communities, with support from WACOSS, and input from key government and community services sector stakeholders. It was divided into several sections, including background information, general awareness and principle specific information.

The survey was structured to enable data collection in relation to:

- the respondents and the organisations they represented, including type of service delivered, size, and location, to determine if these factors had any impact on the implementation of the National Principles;
- governance and leadership in promoting and creating child safety in organisations;
- organisation's awareness and progress towards implementation of the National Principles collectively and the factors that influenced progress;
- child safe resources and activities in organisations who were unaware of the Royal Commission or National Principles, or were not yet implementing them, to help identify existing child safe practices aligned with the National Principles; and
- the implementation status of individual principles to help determine any common opportunities or issues related to the capacity and progress of organisations to implement specific principles.

Both quantitative and qualitative data was collected. For each of the 10 National Principles, scaling questions were used to indicate capacity and progress for implementation. Respondents, from organisations working towards a Principle, were asked to rate their organisation's capacity to implement from one (some capacity) to three (substantial capacity) and progress in implementing from one (some progress) to three (substantial progress). They were asked to explain their rating.

2.5　Focus group design

Building on the information reported in the survey, Communities provided background information for focus group participants and, along with WACOSS and an external facilitator, developed key questions to be addressed through a series of focus groups. The external facilitator led the focus groups, with Communities and WACOSS providing support.

The sessions focused on three areas:

1 | the progress organisations had made towards implementation of the National Principles and the impact of events such as COVID-19 on progress;

2 | factors that help and hinder organisations capacity and progress to implement; and

3 | opportunities and solutions related to organisations working together and for the WA Government to work with organisations to progress implementation.

2.6　Organisation demographics

Respondents to the survey represented organisations across a range of service types[2] including:

- accommodation and residential services for children;
- activities or services under the auspices of a religious denomination;
- childcare or childminding services;
- child protection services;
- clubs and associations with significant involvement by children;
- coaching or tuition services for children;
- commercial services for children;
- services for children with a disability;
- education programs and services for children;
- health services for children;
- justice and detention services for children; and
- transport services for children.

Clubs and associations with significant involvement by children were the most strongly represented service type (59 respondents), followed closely by accommodation and residential services (57 respondents). The least prevalent service types were transport (9 respondents) and services under the auspices of a religious denomination (15 respondents). Two thirds of organisations reported engagement with children daily.

Around 43 per cent of organisations surveyed were based in the Perth metropolitan area, 23 per cent were based regionally, and 34 per cent had bases in *both* Perth and the regions. All regional areas were represented. The South West had the highest number of respondents, followed by Peel and the Pilbara, while Gascoyne and the Wheatbelt had the lowest.

2　Service type categories were taken from the Royal Commission into Institutional Responses to Child Sexual Abuse Final Report (2017), Volume 6, Making Institutions Safe, p.28

The focus groups also comprised broad representation of service types including:

- accommodation and residential services for children
- child protection services, including out-of-home care
- justice and detention services for children
- childcare/childminding services
- education programs and services provided to children
- services for children with a disability.

There was no representation from sporting groups, as consultations with this group was undertaken in a separate process by SportWest and the findings shared via a Government Roundtable.

Participants were mainly from larger organisations with dedicated quality team or quality assurance positions. There were fewer smaller organisations represented and fewer regional organisations represented. Participants tended to come from organisations with a higher capacity to implement the principles, and ones that have already begun the process.

2.7   Method of Analysis

The data from the survey was primarily analysed by applying comparison tables, charts and diagrams, and using a grounded theory analysis[3] approach. Focus group discussion was documented and thematically analysed. Finding across both phases of the consultation have been combined under the thematic analysis.

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3   Grounded theory analysis sets out to discover or construct theory from data, systematically obtained and analysed using comparative analysis

3. Consultation Findings

## 3.1 Current progress, awareness and environment

The consultations suggested there is considerable awareness of the Royal Commission and the National Principles across the community services sector in WA. Three quarters of all survey respondents (76 per cent) felt their organisation was aware of the Royal Commission and associated recommendations. Of the organisations aware of the Royal Commission, 95 per cent were aware of the National Principles and around 30 per cent of these were already subject to regulations or requirements to implement the Principles (Figure 1.1).

Figure 1.1: Organisations' awareness of National Principles (n=182).[4]

Note: This only includes organisations aware of the Royal Commission.
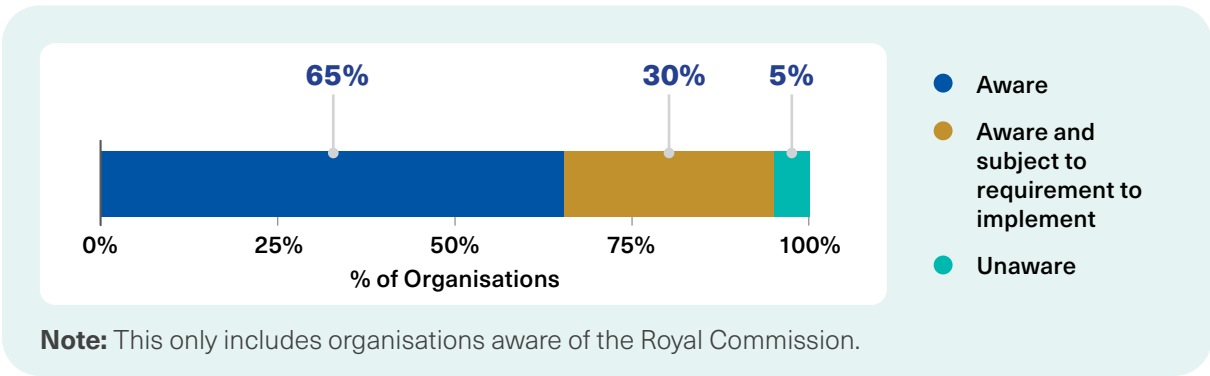
Analysis of the relationship between the number of staff in an organisation and awareness of the National Principles, confirms that the size of an organisation had a considerable impact on awareness levels (Figure 1.2). 89 per cent of organisations with 200 or more staff were aware of the National Principles (including those required to implement), compared to 69 per cent of those with 20-199 staff and 64 per cent of those with fewer than 20 staff.

Figure 1.2: Awareness of National Principles, by number of staff in organisation.

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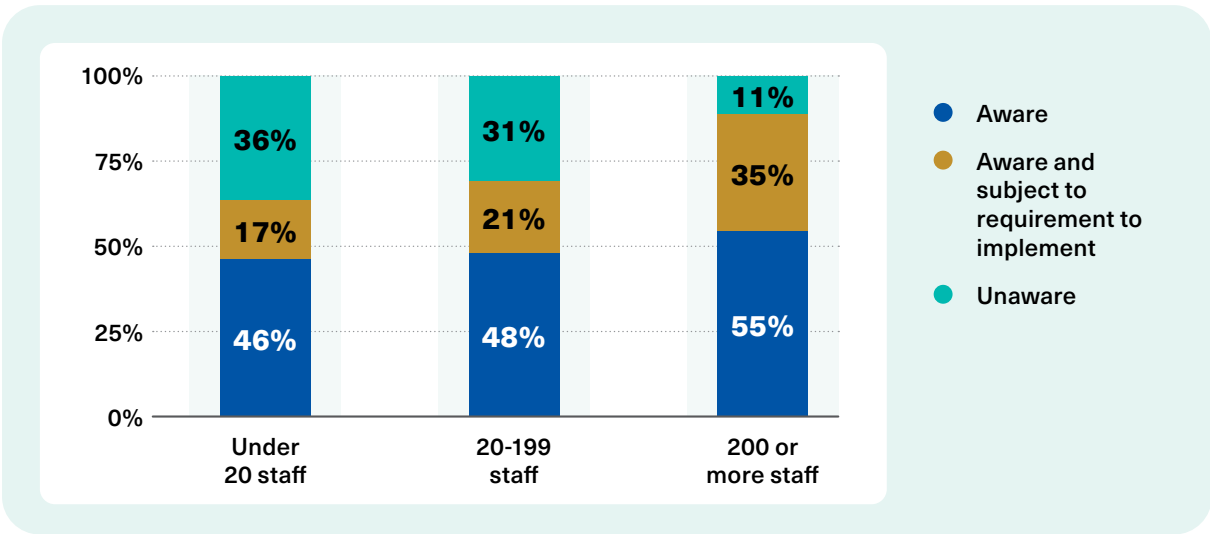
4   n = the number of respondents

Of the organisations aware of the National Principles, the survey showed 79 per cent were working towards implementing at least some of them (Figure 1.3). Within the group of organisations working towards at least some National Principles, 61 per cent had begun implementing *all* ten principles and 89 per cent were implementing at least eight This suggested that once made aware of the National Principles, most organisations were making concerted efforts to begin implementation.

Figure 1.3: Is your organisation currently working toward implementing all or some of the National Principles? (n=166)

Note: This only includes organisations aware of the National Principles.
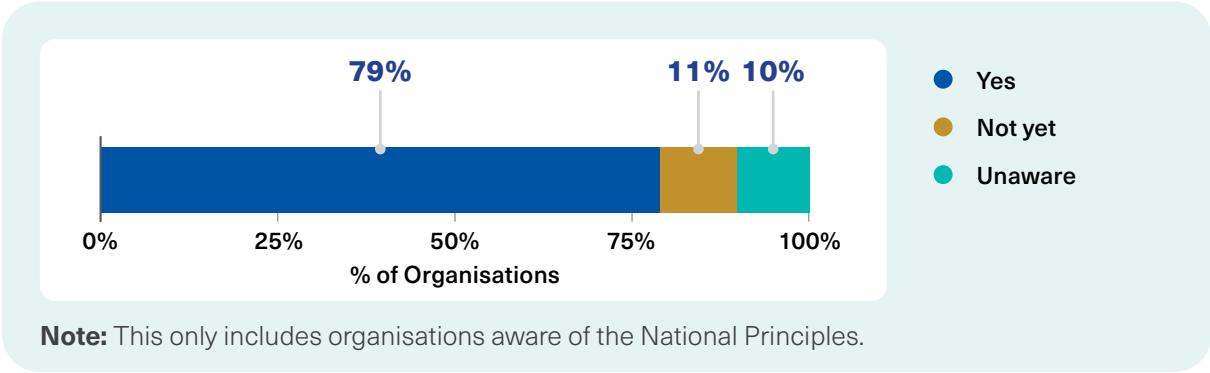
The survey also examined the progress of organisations towards implementation of each National Principle. As shown in Figure 1.4, organisations had made the most progress on:

- Principle 5 (people working with children are suitable and supported), with 76 per cent having made substantial progress; and
- Principle 7 (staff and volunteers are equipped to keep children safe through ongoing education and training), with 53 per cent having made substantial progress.

The least progressed areas were:

- Principle 3 (families and communities are informed and involved in child safety), with only 31 per cent of organisations indicating they had made substantial progress
- Principle 6 (processes for complaints and concerns are child focused), with 36 per cent of organisations indicating substantial progress; and
- Principle 2 (children are informed and participate in decisions affecting them) where 38 per cent of organisations had made substantial progress.

Figure 1.4: Progress made on each National Principle.

	Principle	Some	Moderate	Substantial
1	Child safety is embedded in organisational leadership, governance and culture (n=114)	11%	39%	49%
2	Children are informed about their rights and participate in decisions affecting them (n=104)	21%	41%	38%
3	Families and communities are informed and involved in promoting child safety (n=99)	23%	45%	31%
4	Equity is upheld and diverse needs respected in policy and practice (n=99)	12%	37%	51%
5	People working with children are suitable and supported (n=108)	3%	21%	76%
6	Processes for complaints and concerns are child focused (n=100)	19%	45%	36%
7	Staff and volunteers are equipped to keep children safe through ongoing education and training (n=100)	16%	31%	53%
8	Physical & online environments promote safety and minimise chances for children to be harmed (n=100)	19%	38%	43%
9	Implementation of the Principles is regularly reviewed and improved (n=91)	21%	40%	40%
10	Policies and procedures document how the organisation is safe for children (n=103)	19%	33%	48%

% of Organisations

Note: Proportions for each Principle only include organisations that were implementing that Principle.

A number of focus group participants from larger organisations indicated they had been early adopters of child safe accreditations systems and tools (such as guides and training) prior to the National Principles being established.

All organisations across both phases on the consultation expressed a view that they are committed to furthering any progress they have made on implementation.

Child safe activities for organisations not progressing the National Principles

The survey found that although some organisations indicated they were **not** aware or progressing implementation of the National Principles, a high proportion are still engaged in child safety activities. Of the respondents representing these organisations, 91 per cent reported that volunteers and staff at their organisation fulfilled background check requirements. The same proportion indicated record keeping systems and protocols were maintained and 84 per cent had a risk strategy.

These organisations had made less progress in:

- communicating and utilising complaints processes
- proactively mitigating physical and online risks
- facilitating children's participation in decision making.

Leadership and governance

The results suggest that many board members see themselves and their organisation as engaging in broad child safety activities. A relatively high proportion (68 per cent) of board members indicated that:

- Their organisation championed a child safe culture.
- Their organisational leadership model reinforced behaviours that value children and young people.
- Board members championed attitudes that respect the rights of children and are inclusive.

While it was reported that child safety was championed by board members, training board members and providing them information on the indicators of child harm was the least reported activity.

COVID-19

For the majority of focus group participants, the COVID-19 pandemic caused major service disruptions and had a negative impact on implementation of the principles. Ways in which COVID-19 impacted on services included:

- For a number of organisations, work had commenced on policies and systems but implementation into programs and services were disrupted due to a focus on re-orientating services to a pandemic environment e.g; crisis management, COVID-care packages, online service delivery, suspended programs and the need to focus on business continuity plans. Crisis services reported a higher demand in services.
- Plans to undertake external audits or child safety reviews were put on hold.
- Online delivery raised new concerns about safety for children, young people and staff. There was general agreement that there were limitations to how well online delivery worked, depending on the issues and circumstances – with established client relationships better able to transition, and new clients finding it difficult to effectively engage with online services.
- Staffing impacts had a major effect on services – these included needing to increase staffing numbers to respond to crisis, changing rosters to implement COVID-safe practices, loosing staff, loosing volunteers, and working from home arrangements.
- Early childhood education and care services faced particular staffing challenges. These services were defined as an 'essential service' but faced a series of inconsistent policy and funding changes that impacted on viability and staff retention. Casual staff were excluded from Job Keeper support and many left the sector. Early childhood services are now reporting a national workforce crisis, with many services report unable to secure quality trained staff. For example, agencies reported that prior to COVID there were generally 200-300 positions advertised at any time for childcare staff, now it is over 1,600 vacancies.

For a minority of participating organisations, a suspension of normal service delivery provided an opportunity to focus on National Principle implementation tasks such as training policy development. COVID-19 allowed several agencies to embrace online training and provided an opportunity to increase staff and management access to online training modules directly or indirectly linked to the principles.

3.2 Implementation – what helps and hinders

The following table summarises the key themes or factors that help and hinder progress to implement the National Principles. These were identified across both phases of the consultation.

What helps implementation	What hinders implementation
Organisational leadership, commitment to cultural change. Organisational champions across service areas to support change. Child safety is an organisational priority and a part of the mission statement.	Lack of engaged leadership, lack of supportive organisational culture, a tick box approach and a failure to make principles real and embed in culture. A disconnect between changes in policy and changes in practices on the ground.
Having a dedicated quality position or team and existing Quality Assurance experience and systems. Creation of child safety roles and/or development of a National Principles plan or strategy.	For smaller and regional organisations, the responsibility for child safety or quality systems does not rest within a specialised position or team but must be 'added on' to other responsibilities. Implementation requires a vast body of work without resources to bring in extra assistance.
Staff continuity, understanding and commitment. The importance of providing training to *all staff,* not just those with direct contact with children.	Staff turnover, short-term contracts, casualisation of workforce and staff shortages, such as that being experienced in childcare services.
Rigorous recruitment policies including consistent and coordinated approaches to staff and volunteer checks.	Cost of checks is a barrier. Changes to Working with Children Checks means that not all staff/volunteers can now get one and there are requirement differences based who is providing the service. Lack of nationally consistent checks and portability.
Guides, training modules, manuals, toolkits, template policies, codes and procedures. The Commissioner for Children and Young People and the Working with Children Screening Unit resources were noted as being helpful. Cultural awareness training for staff. Inter-agency training in regional centres and local areas that brings together staff across providers to build networks and communities of practice.	Difficult to navigate resources to determine which are best and evidence based. Lack of specific practice guides for different program and service types. Lack of training and guides that incorporate cultural security. Matching training to right level of staff (e.g; new verses experienced). Focus on online training at expense of local, face-to-face opportunities. Need for someone to translate and work alongside Aboriginal and English as a Second Language (ESL) staff doing online training.

What helps implementation	What hinders implementation
External accreditation systems and external auditing allows organisations to identify their strengths and gaps.	Cost and time required for accreditation and external auditing. This is a strategy that is not viable for smaller organisations.
Collaboration – sharing of resources, learnings, and approaches across sectors and across jurisdictions. Networks and communities of practice.	Regional agencies have less access to network opportunities. Competitive tendering and Intellectual Property requirements can limit sharing.
Clear advice from government departments and consistency across departments.	Unclear contractual expectations that change across departments. Different definitions and criteria across government e.g; definition of 'critical incident' and requirements to report. No 'go to' person or agency.
Experience with similar QA systems and an ability to undertake a mapping analysis of existing accreditation and standards.	The need to meet multiple accreditation/standard systems and the duplication of time and effort across overlapping systems. For example, some organisations are already trying to implement mental health, disability and specialist housing systems.
Funding, guidance and support for implementation. The WANADA cultural standards and Mental Health standards were highlighted as examples were the introduction of quality standards came with dedicated support and funding for implementation.	Delegation of responsibility for implementation to contracted organisations without assistance from funding bodies. Lack responsiveness of funding bodies and unclear communications.
Trauma informed practice, knowledge of history of trauma on service users and families.	Increasing complexity of need and demands on families in crisis and those with a history of intergenerational trauma.
Culture based, continuous improvement and strengths-based approaches.	Compliance and audit-based approaches – ticking boxes without a focus on capacity building. Punitive approaches to compliance.
Working in flexible and creative ways to engage children and families in decision making and policy development.	Highly complex, vulnerable, and transient nature of the children and family's organisations are working with.
Child-friendly processes for providing feedback and input. Accessible and clear online reporting mechanisms. Variety of options for children to escalate complaints.	Complaint mechanisms that are not accessible for children and are too informal, use complex language, and lack anonymity.

3.3 Capacity gaps

In addition to the factors that hinder implementation outlined above, several sector wide capacity gaps were identified across the survey and focus groups.

Smaller, regional and Aboriginal Community Controlled Organisations reported facing significant challenges implementing the National Principles due to internal capacity constraints on time and expertise. They generally struggled to have someone with the knowledge and time to navigate requirements, secure resources and translate them into practice. They were also more likely to experience setbacks when staff moved on or when things got busy during a crisis.

Many of the resources linked to the National Principles are based on instances where staff are 'in charge of children' and working directly with them. For a number of services their contact with children is indirect or staff are not specifically in charge of children. This is an area where there is less guidance and resources.

The survey results showed that progress and capacity to implement the National Principles was highest around principles that relate to staffing, policy and process change. Less capacity and progress was reported around principles that focus on engaging and informing families and children. Focus group participants concurred with these findings and noted that engaging with children and families requires different skills and different ways of working. This is an area of work that is complex and runs the risk of being tokenistic if not done well. Organisations welcomed assistance to build capacity in this area, learning from good practice examples and evidence-based methods for engagement. Translating policy into child friendly formats is not an area that most organisations have currently been able to do.

Online safety is a new and specialised area that many organisations do not feel that they have competency in. Focus group discussions around online and technology safety reflected a capacity gap identified in the survey results.

Translating training and policy to what good practice looks like on the ground was a commonly cited gap. Strategies that support translating policy to practice this is a key area of implementation that organisations are looking for.

Disability service providers noted that self-managed National Disability Insurance Scheme (NDIS) clients will need guidance on how to manage child safety. Disability services also noted that vendor management was a gap i.e; ensuring anyone that is sub-contracted has the right credentials and how to manage a child safety concern raised around a vendor.

3.4 How can the sector support each other

Most participants in the focus group session expressed a desire and willingness to work together to create a community that is safer and friendlier for children, young people, and families. Providers expressed a commitment to work together and believed that there was much to be achieved by pooling resources, reducing duplication, sharing learnings and building communities of practice. Areas of potential sharing and collaboration included resources, online training modules, template policies, checklists and templates.

However, there was a realistic appraisal of the barriers to collaborative practice and sharing resources across organisations. These included being time poor, lacking the capacity or having dedicated roles to make this happen, as well as cultural and legal barriers to sharing intellectual property; exacerbated by short-term funding cycles and competitive tendering models.

A common recommendation was that policies, practice guides and other resources are developed through a central forum (e.g; peak bodies or the Commissioner for Children and Young People) that is resourced and supported by government. The outputs would be shared property (commons license), with the barriers to sharing resolved by prior agreement. Cross-agency quality teams that could work across similar services or be placed in the peak organisations were also suggested. Many participants supported curating a list of recommended resources that have been endorsed, as the quality of some resources available online is uncertain.

Participants supported using existing forums and networks where possible and leveraging existing relationships to diminish the burden of additional meetings on time-limited staff. A suggested strategy was to utilise the expertise and experiences of agencies, that are well progressed in their implementation, to provide leadership and assistance to other agencies.

There was strong agreement for a coordinated approach to training that meshes across standards and principles (to prevent duplication) and is tailored for a range of experience levels and roles. Current training options try to meet all needs and can end up being too basic for some, too complex for others and difficult to apply to practice. One strategy is to insert training on quality standards into the VET certification framework.

Focus group participants recommend that the sector works closely with other states that already have reportable conduct scheme and National Principles in place. The sector should collectively be applying the learnings from how schemes were implemented in those states and adapting to meet WA needs.

3.5   How can State Government support the sector

Consultation feedback suggests that the most effective approach for Government to take to support implementation of the National Principles WA is one that addresses the barriers and enablers to greater collaboration across services and provides practical support to make this happen.

Additionally, if Government wish community service organisations to invest in the long-term change management required to implement the principles, organisations expressed a need for the following:

- Provide certainty of funding beyond 12-month extensions. Short term funding cycles consume resources that could be used for implementation and hinder the ability of organisation to invest in quality assurance systems.

- Develop a common framework for implementation and a medium to long term implementation plan that allows for incremental development.

- Fund peak bodies and networks to assist smaller organisations with less capacity to progress implementation.

- Ensure consistency in approach, expectations, and communications across government funding bodies.

- Ensure that government service providers are demonstrating best practice and not operating in a way that is at odds with attempts by community service organisations to implement the principles. Concerns about a disconnect between community service organisations and child protection practices was the most noted example.

In response to the challenge of working across multiple quality assurance systems, standards and accreditation schemes, organisations suggested that it is the role of government to:

- Map existing systems and identify overlaps and common requirements.
- Investigate ways of simplifying accreditation and regulatory schemes (e.g. co-regulation) to reduce duplication and increase the ease of compliance.
- Identify and rectify inconsistencies between quality assurance systems, compliance and reporting requirements (e.g. critical incidents). This includes the importance of streamlining systems and processes between funders to prevent unnecessary administrative burden.

There are specific challenges for regional and remote services, smaller and specialist organisations, and those who are currently unregulated and less engaged with the implementation processes. A staged roll-out could help prioritise those organisations at greatest risk and need the most assistance.

Participants called for independent oversight and a supportive, continuous improvement approach – rather than one that is punitive. For implementation to work, it needs cultural change, so reportable mechanisms and the 'pointy end' of compliance has the risk of diverting focus and creating a reactive environment. The Commissioner for Children and Young People was generally seen as a more appropriate lead agency in government than the Department of Communities. There are concerns that Communities doesn't have sufficient capability, insight or know how; and that their role as both a funder and service provider does not reflect independence.

4. Outcomes and Conclusions

Consultation with the community services sector demonstrated a strong desire to implement the National Principles that is impacted by a range of factors that impacted both their capacity to implement and progress of implementation. The barrier most consistently identified was lack of resourcing (money, time, and staff) which was compounded by a lack of clear direction and coordination of implementation processes. The solutions identified by the sector included a clear preference to working more collaboratively to realise implementation, and a commitment to sharing information, resources and examples to a 'knowledge hub' to support implementation via cross-sector learning and collaboration.

Respondents also indicated the key role of Government in coordinating and supporting implementation, including through providing opportunities for sharing and more effective collaboration. The sector is looking to Government to provide the resources, tools, contact points and advice to support implementation. They are also looking to Government to address the challenges of working across multiple quality assurance systems, standards and accreditation schemes and for common framework for implementation with a staged plan that allows for incremental development.
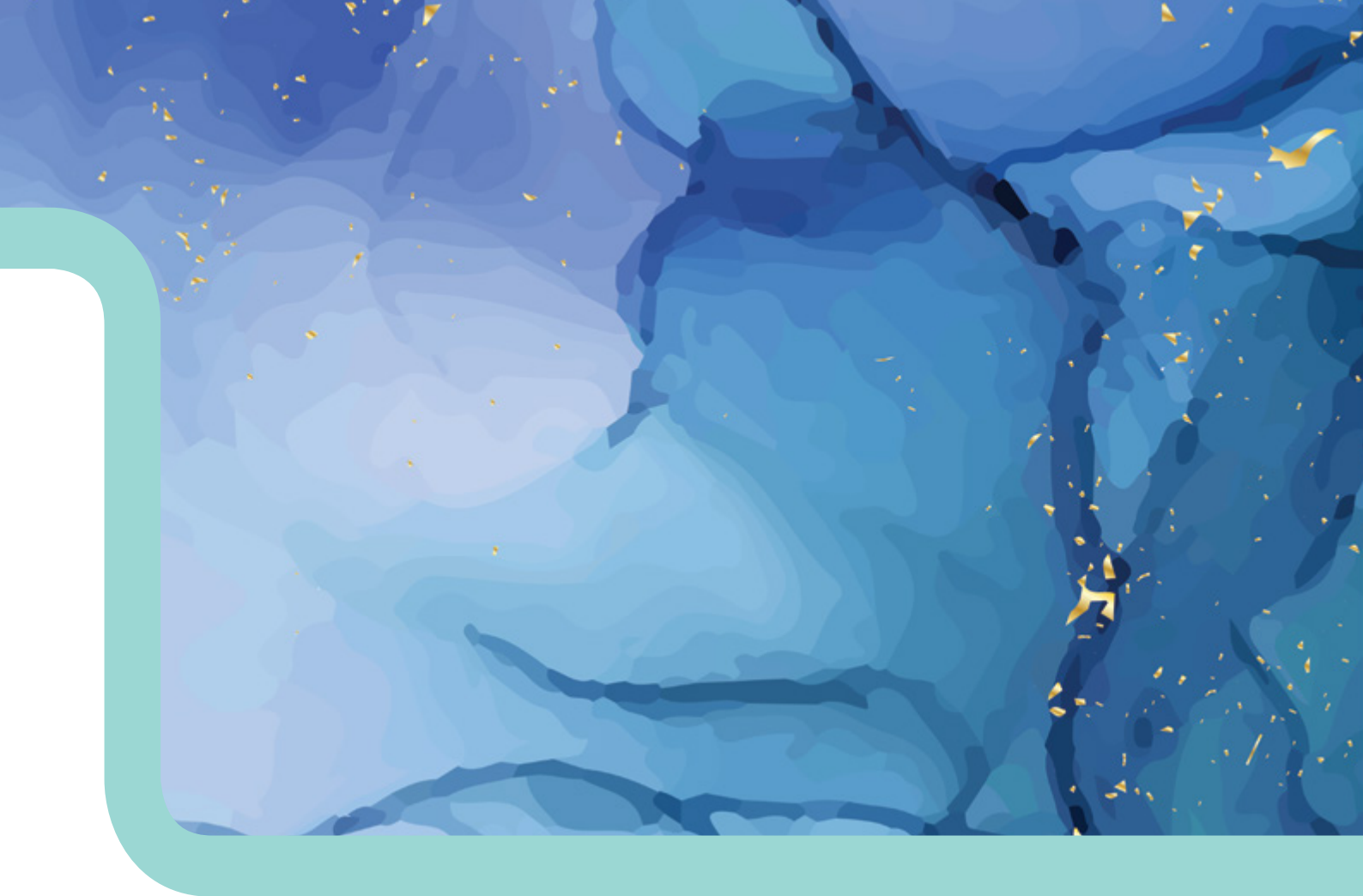
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