

Our Ref: LH:AW
Please reply to: Brisbane office

10 February 2022

Ms Rebekah Kilpatrick
Head
National Office for Child Safety
Department of the Prime Minister and Cabinet
PO Box 6500
CANBERRA ACT 2600

By email: NationalOfficeForChildSafety@pmc.gov.au

Dear Ms Kilpatrick

Submission on the National Strategy Advisory Group

Thank you for the opportunity to make a submission to the public consultation on the proposed model for a National Strategy Advisory Group and complementary non-government consultation mechanisms.

About knowmore

knowmore legal service (knowmore) is a nation-wide, free and independent community legal centre providing legal information, advice, representation and referrals, education and systemic advocacy for victims and survivors of child abuse. Our vision is a community that is accountable to survivors and free of child abuse. Our mission is to facilitate access to justice for victims and survivors of child abuse and to work with survivors and their supporters to stop child abuse.

Our service was established in 2013 to assist people who were engaging with or considering engaging with the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission). From 1 July 2018, knowmore has been funded to deliver legal support services to assist survivors of institutional child sexual abuse to access their redress options,

including under the National Redress Scheme. From 1 January 2022, our services have been expanded to assist survivors who experienced child sexual abuse in non-institutional settings.

Since 2013 we have assisted more than 19,400 clients nationally. Almost one third (32%) of our current clients identify as Aboriginal and/or Torres Strait Islander peoples.

knowmore's feedback in response to the Consultation Paper

Proposed advisory group

Support for multiple advisory groups

We note that the Consultation Paper raises the possibility of multiple non-government advisory groups. We strongly support using multiple advisory groups to ensure that a diverse range of views and experiences are properly embedded in the design, implementation and evaluation of the National Strategy. As discussed further below, we recommend drawing on the National Centre for Action on Child Sexual Abuse's (the National Centre's) proposed Survivor Colleges to help achieve this.

We support one advisory group of the kind indicated in the Consultation Paper, with broad representation from priority groups, non-government organisations, academic institutions and members of the community. This is consistent with the values underpinning the National Strategy — especially that child safety is everyone's responsibility — and reflects the broad focus on educating individuals, families, communities and organisations under Theme 1 of the First National Action Plan (as articulated on page 37 of the National Strategy). Given the diversity of its membership, we suggest this group may work most effectively performing a high-level strategic advice and oversight role.

To amplify the voices of priority groups, we strongly support separate, dedicated advisory groups being established for victims and survivors; children and young people; and other priority groups, including Aboriginal and Torres Strait Islander people. We consider these advisory groups are critical given:

- The National Strategy is focused on a) protecting children and young people and b) supporting and empowering victims and survivors, as articulated in the Strategy's vision (page 20).
- The values underpinning the National Strategy give priority to the views and experiences of victims and survivors (Value 2); place children and young people's voices and views, experiences and participation at the centre of decision-making (Value 3); and commit to hearing and valuing diverse views and experiences, with particular reference to work that is culturally safe and accessible (Value 4; page 21).

- There is a commitment to hearing and prioritising the experiences of priority groups, acting in meaningful ways to meet the needs of priority groups, and communicating with priority groups in ways that are accessible and appropriate (page 23).

In our view, establishing separate advisory groups is one important way of putting these words into action and ensuring the views and experiences of priority groups meaningfully inform implementation of the National Strategy.¹

We note here that the National Centre is in the process of establishing three Survivor Colleges as part of its governance arrangements — a Survivor-led Adult College, a First Nations College, and a Children and Young People College. We strongly recommend that these be drawn on to help achieve what we propose above in terms of separate advisory groups (noting that some dedicated advisory groups may still be need to be established for other priority groups not covered by the Survivor Colleges e.g. people with disability). The advisory group structure for the National Strategy should not duplicate the work of the National Centre and its Survivor Colleges.

Further comments on advisory group membership

Across all advisory groups, we consider it particularly important for the group’s composition to reflect:

- The broad scope of the National Strategy in terms of its focus on child sexual abuse in all settings, including in organisations, online and within families. This is particularly relevant for the victim-survivor advisory group.
- The *national* focus of the National Strategy. All advisory groups should comprise members from across the country and include representatives from rural, regional and remote communities.

For the advisory groups to be most effective, we suggest that each group will require a skilful facilitator who can help the group to function well and ensure all members of the group are able to meaningfully participate and contribute. They should have skills to ensure meaningful engagement within the process, and to hear actively and equally from all participants.

¹ We also note that a children and young people’s advisory group is consistent with the view of the Royal Commission that “children and young people should be central to and valued in the development of all community prevention activities. This would include participating in reference or advisory groups...”. See Royal Commission, *Final Report: Volume 6, Making Institutions Child Safe*, 2017, p. 104, www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_6_making_institutions_child_safe.pdf.

We understand that the National Centre's Survivor Colleges model will deliver best practice in this area and reiterate our support for the National Strategy's advisory groups to draw on this model rather than duplicate it.

Expression of Interest process

We support an Expression of Interest (EOI) process for the advisory groups, as outlined in the Consultation Paper. In our view, it is essential that the request for EOIs is advertised widely and via multiple channels beyond those listed in the Consultation Paper, to ensure high levels of awareness, especially within the general community, and interest from the broadest possible range of stakeholders. We particularly suggest leveraging the reach of advocacy and support services to target particular priority groups (for example, victims and survivors; children and young people; people with disability; Aboriginal and Torres Strait Islander people).

knowmore also supports a transparent and rigorous selection process. This should include references or similar to show that members have the support of the survivor group or community they are there to represent. It is also imperative that decision-making about the make-up of these groups is as transparent as possible, including in terms of who will be making decisions about membership and how that will occur, and that in settling on membership, room is made for new voices as well as existing ones in the advocacy space around these important issues.

Remuneration for advisory group members

We support advisory group members being remunerated in recognition of their time and expertise but emphasise the importance of this being tailored to suit an individual's needs and preferences (particularly, for example, to ensure children and young people are compensated in age-appropriate ways, and Aboriginal and Torres Strait Islander people are compensated in culturally appropriate ways). There also needs to be an opportunity for clear and public noting for people in paid roles to identify where they are not being remunerated through the National Strategy advisory group for their participation.

Other comments on advisory groups Terms of Reference

We see potential overlaps in the work of the advisory groups and that of the National Centre. To help avoid duplication and potential impacts on victims and survivors, we suggest that careful attention be given to the Terms of Reference for advisory groups established by the National Office for Child Safety (the National Office) and the National Centre. For the National Strategy's advisory groups, we especially suggest that the Terms of Reference clearly outline the expected relationship/interaction between the group and the National Centre, and the work that is in and out of scope.

Other ways of engaging with stakeholders

Priority groups

We see the dedicated advisory groups and/or the National Centre's Survivor Colleges as playing an important role not only in providing input into the implementation of specific National Strategy measures, but also in providing advice about the most appropriate and effective ways to engage with priority groups.² Acknowledging that the advisory groups/Survivor Colleges will be best placed to help develop specific engagement strategies, we support:

- Giving all priority groups, including victims and survivors, the opportunity to engage with the National Office and other agencies implementing the National Strategy through various avenues, including time-limited working groups, informal meetings and specific requests for feedback, as proposed in the Consultation Paper.
- Recognising diversity within individual priority groups, especially in terms of ensuring that consultation mechanisms are responsive to cultural and linguistic diversity and the particular needs of people with disability.
- Ensuring consultations with Aboriginal and Torres Strait Islander people follow cultural protocols and are culturally safe.
- Ensuring consultations with children and young people include a specific focus on children and young people in high-risk institutional environments such as out-of-home care and youth and immigration detention.
- Ensuring all consultations, particularly those with children and young people, are conducted ethically and safely.
- Recognising that there may not be any one approach that works best to achieve outcomes with priority groups, and that processes will need to remain flexible in their delivery to maximise participation and benefit.

Stakeholders generally

We support the proposals outlined in the Consultation Paper to:

- Establish a stakeholder consultation list to receive updates, consultation papers, workshop invitations and other information on the National Strategy and its measures.
- Provide more general updates on the National Office and the National Strategy on the National Office's website and e-newsletter.

² We note that the work of the Royal Commission also offers some useful insights about engaging with members of priority groups, including children and young people with cognitive and other disabilities. See Royal Commission, *Final Report: Volume 6*, pp. 104–105.

Social media may be a useful complement to this.

However, we strongly recommend that the National Office also use other methods to reach and provide information to stakeholders, to meet their diverse needs and preferences. We particularly note that electronic mailing lists and website updates do not cater to everyone in the community — we know, for example, that older people and people in regional areas are less likely to have household internet access.³

Given the National Strategy includes a focus on the community's role in creating child safe environments (as articulated on page 29), it is essential that information about the National Strategy, and consultation processes, are accessible to everyone. We especially suggest providing information through traditional media, organisations and local services to help reach people who may not be reached through online channels alone.

We would also strongly support the development of culturally secure and accessible communications strategies for stakeholder feedback for Aboriginal and/or Torres Strait Islander communities, culturally and linguistically diverse communities and people living with a disability, in recognition of the additional barriers they may face in accessing conventional communications as outlined above.

Thank you again for the opportunity to provide these comments. We have no concerns about our submission being published.

Yours sincerely,



AMANDA WHELAN

Acting Chief Executive Officer

³ In June 2021, 11% of Australian adults in regional locations had no home internet access (compared to 8% in metropolitan locations), and 11% of Australian adults aged 55 years and over had no home internet access (compared to 9% under the age of 55). See Australian Communications and Media Authority, 'Communications and media in Australia: How we use the internet' (interactive report), December 2021, <www.acma.gov.au/publications/2021-12/report/communications-and-media-australia-how-we-use-internet>.