



Tasmanian Council of Social Service Inc

Change for Children Amended Strategy Further Feedback

December 2024



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About TasCOSS

TasCOSS's vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

Please direct any enquiries about this submission to:

Adrienne Picone, Chief Executive Officer

(03) 6231 0755

adrienne@tascoss.org.au

Change for Children Amended Strategy

Further Feedback

TasCOSS welcomes the opportunity to provide feedback to the amended Change for Children Strategy ('the Amended Strategy'). This submission supplements the information and feedback already provided to the Department of Premier and Cabinet ('DPAC') in relation to their commitment to fully implement recommendation 19.1 of the Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings ('Commission of Inquiry').

TasCOSS is supportive of several elements of the Amended Strategy, including:

- The inclusion of a shorter summary document to accompany the Amended Strategy;
- The explicit recognition of the importance of public health model in understanding and responding to child safety and wellbeing, as well as an overview of what a place-based approach to this issue could look like;
- Greater detail in relation to the underlying risks and driving factors impacting child safety and wellbeing; and
- Acknowledgement of the broad scope of prevention initiatives and activities.

We also strongly support the inclusion of the voice of children and young people, particularly those who have experiences within Tasmanian institutions.

The following is an overview of key areas where we believe the Amended Strategy could be strengthened. This feedback should also be read alongside our earlier feedback in relation to the Amended Strategy, as well as our feedback relating to the earlier version of Change for Children and Collaborating for Change.

Centering the needs and rights of children in the Strategy

All children deserve to be treated with dignity and respect, and to have confidence that their rights will be upheld in all settings.

While human rights belong to everyone, the rights of children acknowledge their unique developmental needs and vulnerabilities. The rights of children are enshrined in the United Nations Convention on the Rights of the Child (UNCRC) and must underpin all efforts to prevent and respond to child sexual abuse, including the cultural and systems change required to safeguard children from harm.

The promotion and protection of children's rights were key drivers behind the recommendations of the Commission of Inquiry. However, achieving meaningful and lasting change requires levers across intersecting areas of public policy to prioritise and uphold the rights of all children. A child rights

framework offers an opportunity to ensure that children's needs, voices, views and experiences are centred in decision-making processes.

We commend the amendments made in the Amended Strategy to emphasise the rights of children, including an acknowledgment of the Government's duty to uphold the rights of all children equally, and the inclusion of a child-centred approach and children's rights sections. These are significant improvements from the first version of the Strategy, however we recommend additional action to clarify and promote the rights of children within and through the Amended Strategy.

Include an overarching principle on child rights

The Commission of Inquiry emphasised the importance of embedding children's perspectives, views and experiences into decision-making processes, including the development of public policy.¹ They consistently highlighted the need for cultural and structural change to actively encourage and empower children's participation in decisions that affect them and the elimination of barriers that impede meaningful participation. Action to safeguard a child's right to participate demonstrates that children are valued and respected and promotes better safety and wellbeing outcomes by ensuring that decisions are responsive to the needs of children.

To reflect the cultural shift in the attitudes and beliefs required to uphold children's views, opinions and experiences, we recommend including an overarching principle of child rights in the Strategy. This principle would serve as a foundation for the Strategy by affirming that child rights are essential to effectively preventing and responding to child sexual abuse.

We therefore recommend the inclusion of an explicit, overarching principle on child rights:

Children and young people are respected as individuals in their own right. Their views, experiences, and opinions are given appropriate weight and consideration in all decisions that affect them. They are provided with the support and assistance they need to thrive.

Adopting this principle would align the Strategy with the intent and recommendations of the Commission of Inquiry, while reinforcing the Government's duty to safeguard children from harm.

Improving the 'Vision' to centre the rights and needs of children

The aspirations of the ten-year Strategy are set out in the vision:

Tasmanian children and young people are protected and safe from sexual abuse, and victim-survivors are supported and empowered. They are all enabled to thrive, and their wellbeing is protected in all places they live, learn, play, and work.

¹ [Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings Final Report](#) (2023), vol. 1, p.13.

We understand that this vision was selected as the preferred option by some stakeholders during a workshop to redesign the Strategy.² However, of the alternative visions presented at the workshop, TasCOSS is most supportive of the vision in the original draft Strategy:

Tasmanian children and young people have what they need to grow and thrive; they are safe and respected in institutions, homes, families, communities, and all places where they live, learn, play and heal.

TasCOSS believes that the vision should extend beyond the protection of children from sexual abuse, by broadening the vision statement. This would support a preventative approach to address the drivers of child sexual abuse and to emphasise a child's right to live in safety and to have their needs met. The experiences and perspectives of adult survivors of child sexual abuse provide invaluable insights that have and should continue to shape policy. They should have access to the support that they need to respond to and recover from abuse. However, from a child rights perspective, we believe that the Strategy should centre the distinct developmental and recovery needs, experiences and rights of children above all else and to ensure that it remains dedicated to prioritising the safety, dignity and wellbeing of children.

Strategy (and feedback) should include the voices of children

To be child-centred, individuals, organisations, institutions and communities must prioritise the voices of children and actively work to uphold their best interests.³ Building shared understandings of child-centred and child-rights approaches requires creating meaningful opportunities for children to influence decisions that affect their lives, including the development of public policy.

It is concerning that the Amended Strategy released for consultation does not yet include feedback from young people about what 'upholding their rights means to them.' While we understand this section is still being drafted following the outcomes of workshops held by the Youth Network of Tasmania and the Premier's Youth Advisory Council in December 2024, it is critical that the Strategy represents the perspectives of children and young people, particularly those whose risks of sexual harm are heightened due to their contact with institutions. This includes children in the youth justice and out-of-home care systems, whose lived experience and perspectives of rights are vital to shaping policy designed to prevent and to safeguard them from harm.

Significant work has already been undertaken with Tasmanian children to understand their views and experiences of child rights. For example, the *Voices of Young People in the Youth Justice System Project* shares the views of young people with lived experience of Tasmania's youth justice system about their experiences and how we can better support vulnerable young people.⁴ Yet the voices, experiences and

² Discussed at Tasmanian Government (2024), Keeping Children Safe Reform Unit, 'Workshop 1, Co-Designing the Framework: Change for Children 10 Year Strategy — Summary of workshop activity responses and draft strategy elements for consultation, p. 9.

³ Australian Childhood Foundation (2015), '[What does it mean to be child-centred?](#)' 16 April.

⁴ Commissioner for Children and Young People Tasmania (2024), '[Voices of Young People in the Youth Justice System Project](#)'.

perspectives of these children and young people are absent from the Amended Strategy, limiting opportunities to ensure that the Strategy is informed by the lived experience of those it seeks to protect. To address this gap, we recommend that the Strategy includes representation of marginalised children's views about rights.

Additionally, we recommend adopting the recommendations from the recently released report by the National Children's Commissioner.⁵ These include the use of tools, such as the *Child Rights Impact Assessment Tool*, to ensure compliance with international child-rights obligations and to promote a deeper understanding of children's rights among policymakers and stakeholders. This approach not only upholds the rights of children but also ensures that policies and practices are more effective, equitable and responsive to the diverse needs of children.

Expanding children's rights

We support the inclusion of 'Children's Rights' in the Amended Strategy and reference to the UNCRC. In addition, we recommend the inclusion of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) to acknowledge the intersecting rights of Aboriginal children. We posit that this would assist in the recognition and protection of rights, as well as encouraging a cultural change in attitudes and beliefs, improved accountability and transparency, and greater community awareness of rights and responsibilities.

A greater focus on Government accountability and transparency

TasCOSS strongly supports the expansion of the scope of the Amended Strategy to ensure the Strategy can be most effective in preventing, identifying and responding to all instances of harm to children. However, we strongly believe the strategy should also include explicit information on what steps the Government should and will be taking to address systemic issues, including culture and practice, which contribute to and exacerbate harm experienced by children.

Including a focus on Government

As recommended at the in-person workshop on 19 December 2024, TasCOSS strongly recommends the inclusion of a section to clarify a key intended purpose of the Strategy is to support and maintain cultural and practice shifts within Government, with outcome items aimed at promoting transparency and accountability in Government decision-making and consistent in practice across all Government departments working in areas relating to child safety and wellbeing. We also look forward to a section with tangible outcome areas relating to Government decision-making and policy development in the forthcoming action plan.

⁵ Australian Human Rights Commission (2023), ['Safeguarding Children: Using a child rights impact assessment to improve our laws and policies.'](#) Please note, the standalone tool can be accessed on the Australian Human Rights Commission website.

Child-friendly and accessible materials and ways of engaging with Government

We strongly believe the Government should look to current international examples of how governments elsewhere are using child-friendly and accessible approaches to ensure the work they are doing relating to child safety and wellbeing is easy to access, understand and evaluate.

One example is The Promise Scotland,⁶ a national initiative following a promise made by the Scottish Government to improve outcomes for children with lived experience of the out-of-home care system. The website relating to this initiative has clear and accessible information relating to progress made in relation to this commitment, including resources such as outcome reports from consultations with young people, reports and meeting minutes from key groups (including the oversight board, an advisory body established to monitor and report on the Scottish Government's progress).

TasCOSS has previously recommended the Government develop and maintain a centralised website where people, including children, can access up-to-date information about progress in relation to the Commission of Inquiry recommendations, as well as relevant reports relating to developments in areas relating to child safety and wellbeing. We also continue to advocate for the preparation and publication of consultation review documents to allow interested stakeholders to view the feedback of other organisations and key groups, as well as how the Government has weighed and evaluated the information and feedback they have received to make decisions relating to policy and legislative development.

Meaningful participation

We understand the Government intends to develop separate, standalone strategies for both prevention and monitoring/evaluation, and we look forward to participating in the development of these further strategies.

We also strongly recommend the development of a participation strategy to guide how Government (ideally across all departments) will engage with children and young people, and how this consultation/engagement will shape public policy and legislative reform. If the participation of children is to be genuine, meaningful and effective, we believe the Government should not only create opportunities for children with lived experience to share their views, but also be transparent about how their lived experience will be listened to, valued and used to shape policy and decision-making.⁷ One example the Government could use as a model/template is the Irish Government's National Framework for Children and Young People's Participation in Decision-Making.⁸

⁶ [The Promise Scotland](#).

⁷ For an overview of child participation, see Commissioner for Children and Young People Victoria (2021), '[Empowerment and Participation: A Guide for Organisations Working with Children and Young People](#)' (2021); 54 Reasons, '[Child Participation Framework](#)'.

⁸ Government of Ireland(2024), '[National Framework for Children and Young People's Participation in Decision-Making](#)', Department of Children, Equality, Disability, Integration and Youth, Hub Na nÓg.

Final comments

We understand the workshop on 4 November 2024 did not include participation from any Aboriginal groups or organisations. We are extremely concerned that progress in relation to the Amended Strategy is happening separate to the development of other strategies and policies (for example, the Aboriginal Justice Strategy) and highlight the importance of consistency between approaches and policies in order to be effective.

Even if separate strategies for Aboriginal communities are developed, the Amended Strategy should acknowledge and highlight elements of these strategies, consistent with national policy. For example, even though there is a separate Aboriginal and Torres Strait Islander Action Plan,⁹ the National Strategy to Prevent and Respond to Child Sexual Abuse still contains references to measures and priorities which relate to Aboriginal children, families and communities.¹⁰

Finally, we understand the development of the action plan(s) relating to the Amended Strategy will also be subject to significant time constraints. We urge the Government to consider the recommendations TasCOSS has previously made in relation to effective and meaningful consultation with Tasmanian community members and organisations.¹¹ Given the action plan(s) will be developed under significant time constraints, we strongly recommend the Government prepare an overview/analysis of the recommendations they have received so far in relation to proposed action items, to ensure those who are able to participate in any further consultation have the benefit of seeing and reviewing recommendations received so far (and reducing the pressure on organisations who may have already provided a response to repeat their prior recommendations).

⁹ Commonwealth of Australia (2023), *Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan (2023-26)*, Department of Social Services.

¹⁰ For example, please see), Department of the Prime Minister and Cabinet (2021), *National Strategy to Prevent and Respond to Child Sexual Abuse (2021-30)*, pp. 40-41.

¹¹ TasCOSS (2024), [‘Consultation Strategy: Commission of Inquiry Reform Implementation Project,’](#) April 2024).