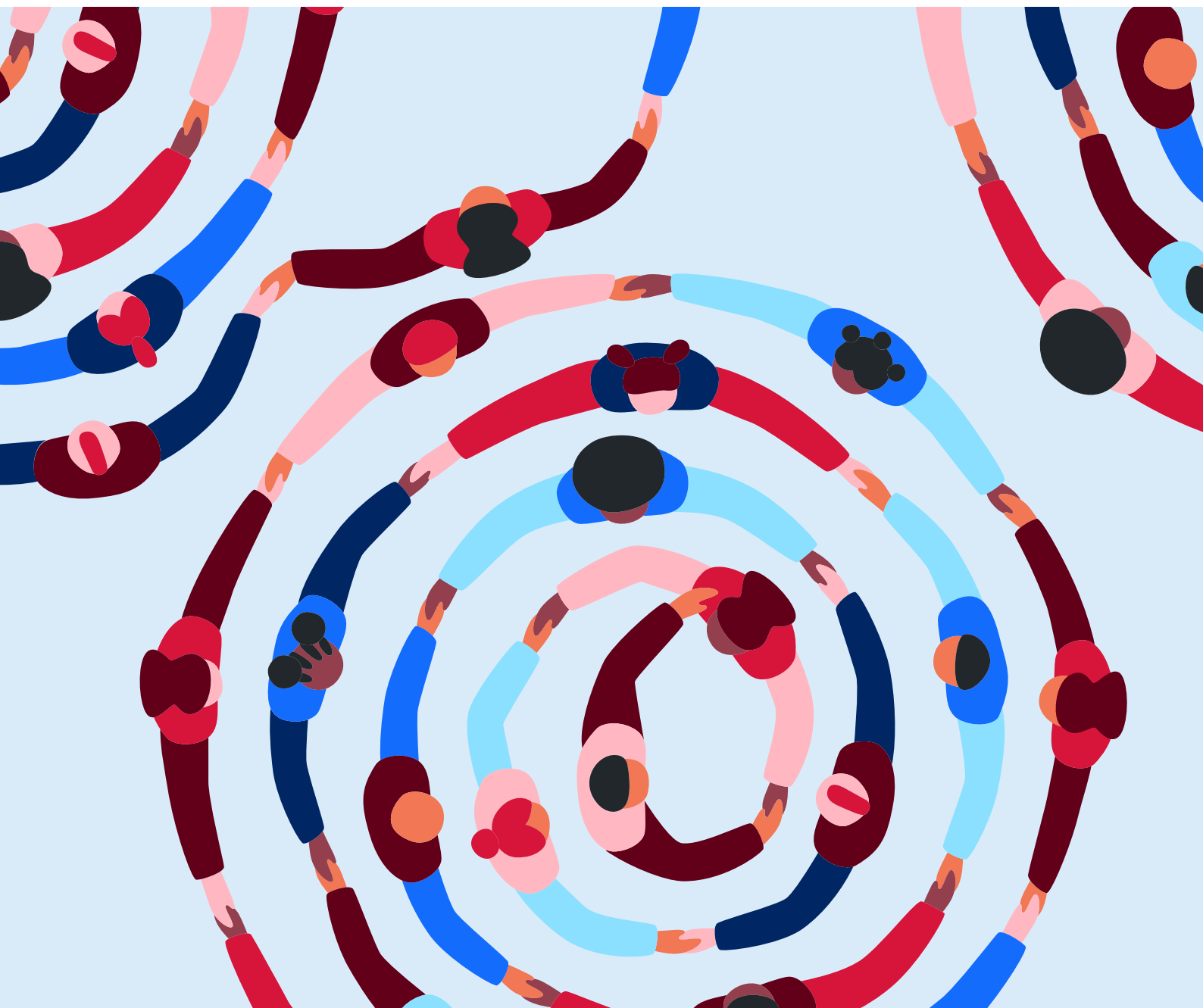


Child Safe Action Plan

(CSAP) – April 2023



Overview

Purpose and objectives

The Department of Communities and Justice (DCJ) has developed this Child Safe Action Plan (CSAP) to outline the strategies and tasks DCJ will implement as a prescribed agency under the **Children's Guardian Act 2019** to improve child safety across NSW.

It details activities being undertaken to build awareness about the importance of child safety; build the capability of child safe organisations to implement the Child Safe Standards, and improve the safety of children in services provided by DCJ and our related bodies.

The implementation of the CSAP is an ongoing process to drive continual improvement to child safety across the department's functions and services and those of our funded service partners. This initial plan focuses on:

- Promoting the [Child Safe Standards](#), and educating stakeholders about child safety and child rights
- Assessing departmental risks and identifying opportunities for service and process improvements
- Establishing a framework for monitoring, evaluation and continual improvement.

The ultimate outcomes DCJ seeks through implementation of the CSAP are:

- NSW children and young people are safe in the organisations that they learn, play, and live in
- Reduction in child abuse in organisational settings
- Improved responses and reporting of child abuse.

Enquiries can be sent to:

childsafescheme@facns.nsw.gov.au



Scope

The Children's Guardian Act 2019 requires that the DCJ CSAP encompasses:

- Youth Justice, and
- any part of DCJ that is principally involved in the administration of an Act administered by the Minister for Families and Communities and the Minister for Disability Services.

DCJ administers numerous Acts and as such the CSAP encompasses a broad range of functions and services, which are set out below.

In practical terms, the DCJ CSAP must cover all staff that require a Working With Children Check (WWCC) and any programs and facilities that children have access to. This includes staff and teams that may not be considered directly 'child-related'. For example, reception staff at a DCJ facility would need a WWCC and recruitment practices for all staff across the organisation must align with the Child Safe Standards.



DCJ functions and services

DCJ brings together NSW Government services aimed at achieving safe, just, inclusive and resilient communities.

DCJ has statutory responsibilities under various Acts of government, and works with the community, non-government partners and other agencies to improve outcomes for:

- People who have experienced domestic and family violence
- People who have experienced sexual assault
- Young people and adults in contact with the justice system
- People experiencing or at risk of homelessness or in need of safe and affordable housing
- Vulnerable children and young people
- People with disability
- Aboriginal children, young people, families and communities
- People from culturally and linguistically diverse backgrounds.



Key risks in relation to child safety

In order to build awareness and capability and build a child-safe organisation, we need to know how to recognise factors in our culture, operations, and environments that increase risks to child safety. Leaders, staff, and volunteers need to know how to respond to allegations of abuse and report as required. A range of institutional cultures, and operational and environmental risk factors, can enable the occurrence of institutional child sexual abuse, such as:

- Failure of leaders to understand, or promote awareness of, child sexual abuse
- Prioritising the reputation of the organisation or service over the needs of children
- Failing to identify sexualised and grooming behaviours
- Allowing perpetrators to hold, or influence people in positions of authority
- Ineffective child protection policies and procedures
- Access to children in isolated or unsupervised private locations
- Risks in the online environment for online grooming.

A key deliverable of this CSAP will be a comprehensive and consultative assessment of risks relating to child safety across all child-related departmental contexts, functions, and services. The Child safe standards compliance assessment tool will be used to track progress over time. Highlighting specific child safety risks so they are comprehensively understood across DCJ child-related contexts, and targeted approaches are identified to assess risk for particularly vulnerable cohorts.

Key levers for change

DCJ will continuously improve child safety across the following domains of influence and in partnership with our key stakeholders:

- Organisational leadership, governance and culture
- Human resources management
- Child safe policies and procedures
- Staff education and training
- Sector engagement and communication
- Children's participation and empowerment
- Family and community involvement
- Regulatory compliance and contractual mechanisms.

Roles and responsibilities

Office of the Children's Guardian

The OCG has regulatory oversight of the implementation of the Child Safe Scheme across NSW. To do so, the OCG will assist organisations implementation of the Child Safe Standards in several ways:

- Provide guidance to prescribed agencies in developing Child Safe Action Plans through consultation and review of plans.
- Provide generic and sector-specific support to build capability in organisations to implement the Child Safe Standards.
- Engage with key stakeholders, including children and the broader community, to raise awareness of the Child Safe Standards.
- Monitor, investigate and enforce the Child Safe Standards through ongoing risk assessments of priority sectors and organisations.
- Request a progress report from prescribed agencies on CSAP implementation and outcomes including information.

Find more information here:
ocg.nsw.gov.au/child-safe-scheme



Department of Communities and Justice

DCJ, as the lead agency for preventing abuse and protecting children, has a strategic role to play in relation to the Child Safe Standards, providing a child safe organisation for children and young people.

The Royal Commission into Institutional Responses to Child Sexual Abuse highlighted the failures of government and non-government institutions that had devastating consequences for children and young people in their care.

DCJ has zero tolerance for child abuse and will treat all allegations and safety concerns seriously in accordance with policies and procedures. DCJ will be responsive to the needs of all children and young people, including the cultural safety and needs of Aboriginal and Torres Strait Islander children; children from culturally and linguistically diverse backgrounds; children with disability; LGBTQIA+ children; very young children; children with prior trauma, and children living in remote locations.

Additionally, DCJ commits to:

- Ensuring child safety and wellbeing is embedded in our organisational culture, reflected in our policies and procedures, and understood and practiced at all levels of our work
- Continuing to build a culture where abuse of children is prevented, reported, and responded to
- Improving organisational cultures, operations, and environments to prevent child abuse—including sexual, physical, emotional abuse, and ill-treatment and neglect—and seeking to ensure child maltreatment is responded to appropriately if it does occur
- Improving the capacity of our sector and non-government partners to do the same
- Ensuring children’s voices are heard about decisions that affect their lives
- Ensuring children and young people have clear and appropriate mechanisms by which to raise concerns about their safety
- An overarching goal that all children are able to grow up safe, strong and reach their full potential.



Objectives and approach



This Child Safe Action Plan (CSAP) sets out the activities DCJ will undertake over the period 2023 to 2027. DCJ sees the CSAP process as an iterative one intended to drive continual improvement to child safety over time. This plan contains five phases of implementation incorporating the three pillars described by the OCG: building awareness; building capacity and implementing the Child Safe Standards:

Planning: Establishing effective strategic oversight to ensure Department-wide accountability, and engaging in the Community of Practice led by the OCG as a mechanism for ongoing consultation across the sector and with other NSW Government agencies. Facilitating ongoing consultation with relevant stakeholders and organisations to progressively inform implementation. Further consultation with identified stakeholders to address specific deliverables for example to incorporate Aboriginal, children, and young people's voices.

Building awareness: Informing staff, the sector and community about the importance of child safety by developing an overarching communication plan to deliver information via a broad range of communication channels identified through consultation to ensure information is spread to all stakeholders.

Capacity building: Strengthening the capability, skills, knowledge, and expertise of child-safe organisations to implement the Child Safe Standards (the Standards). Developing DCJ risk assessment tools to assess child safety to measure and identify risks and develop mitigation strategies to measure progress and increase safety for children. Promoting OCG Child Safe assessment and risk remediation resources to funded services. Promoting education and training resources on child safety and rights to support vulnerable cohorts developed by the OCG. Scoping and developing options for targeted staff learning resources

Implementing the Child Safe Standards: Developing and implementing a DCJ Child Safe Policy; revising the DCJ Code of Ethical Conduct to ensure it applies to the Standards. Reviewing the DCJ Complaints policy and re-engineering complaint mechanisms to ensure it is child-friendly and accessible. Assessing and revising other child-related organisational policies and procedures and service specifications and contracts to embed and apply the Standards.

Monitoring and review: Establishing a framework for review, evaluation, and continual improvement. Reviewing the CSAP to uncover Department-wide learnings from the first cycle, assessing the effectiveness, and measuring implementation to inform the development of the next cycle. Publishing the progress of the implementation of the CSAP in the DCJ Annual Report.

Action plan

	Actions	Desired outcomes	Timeframe	Owner	Data points
1. Planning					
a	Integrate CSAP oversight into Royal Commission implementation governance structure	<ul style="list-style-type: none"> DCJ has effective strategic oversight of its implementation of the Child Safe Standards, and department-wide accountability for deliverables 	Feb-23	Child and Family	Meeting minutes and actions
b	Engage in sector consultation and participate in Community of Practice	<ul style="list-style-type: none"> Ongoing consultation with relevant sector organisations and other NSW Government agencies to guide CSAP implementation Aboriginal voices are represented in CSAP implementation and DCJ has the benefit of sector expertise around vulnerable families Peaks' constituent organisations are engaged with the implementation of the Child Safe Scheme All parts of the sector receive support through the OCG's Community of Practice, commensurate with their level of maturity and resourcing Providers are supported through implementation of the Child Safe Standards in a tailored approach 	Ongoing	Child and Family	Meeting minutes and actions Number of published /issued sector news pieces
c	Develop overarching communications plan	<ul style="list-style-type: none"> Communications to stakeholders are delivered through a structured and coordinated approach to ensure clarity and consistency A broad range of communication channels are identified through internal consultation, ensuring information reaches relevant staff, sector organisations, children and families 	Feb-23	Child and Family Strategic Comms	Internal email engagement DCJ intranet analytics Number of internal and sector news pieces Informal feedback from stakeholders
d	Map DCJ child-related functions and services	<ul style="list-style-type: none"> Child-related functions and services are comprehensively scoped through extensive consultation to inform CSAP development and key actions Mandate and policy owners are identified and engaged to ensure policies and materials consider the applicability of the Child Safe Standards across departmental functions and services 	Oct-22 May-23	Child and Family	Map of DCJ child-related business areas, and mandate and policy leads

	Actions	Desired outcomes	Timeframe	Owner	Data points
e	Develop and publish CSAP	<ul style="list-style-type: none"> • DCJ meets its obligations as a prescribed agency under the <i>Children's Guardian Act 2019</i> • Related bodies and other stakeholders are aware of DCJ's approach to implementation • DCJ's implementation plan incorporates the voices of the Aboriginal community and consideration of vulnerable cohorts of children and young people • Open and collaborative information sharing between DCJ, OCG, and sector 	Feb-23	Child and Family	Unique web page visits Activated links from annual report
2. Awareness raising					
a	Establish dedicated web infrastructure	<ul style="list-style-type: none"> • A central web platform is available to host and promote child safety information and resources, including essential child safe information, links to relevant organisations and resources. • Key messaging around implementation is consistent and adheres to accessibility standards • Communication plan drives internal and external users to website resources and education 	Feb-23	Child and Family Digital Media	Unique web page visits Activated web links
b	Publish and promote Statement of Commitment	<ul style="list-style-type: none"> • Stakeholders understand best practice principles of child safety and DCJ's commitment to the Standards 	Feb-23	Child and Family Strategic Comms	Unique web page visits Activated web links
c	Assess staff awareness and understanding of child safety	<ul style="list-style-type: none"> • Staff understanding of child safety is benchmarked and documented to inform responsive strategies and communications 	Aug-23	Child and Family People	Survey outputs DCJ Risk Assessment Tool results

	Actions	Desired outcomes	Timeframe	Owner	Data points
d	Engage children and young people to assess their awareness and understanding of child safety and inform implementation	<ul style="list-style-type: none"> • Children and young people's understanding of child safety is benchmarked and documented to inform responsive strategies and communications, including the voices of children who are Aboriginal, CALD, LGBTQIA+ and survivors of sexual, domestic and family violence. • Children and young people are engaged through established channels and structures to inform a range of deliverables (eg Advocate for Children and Young People's Youth Advisory Council, Youth Justice, JCPRP forums) 	Aug-23	Child and Family	Number of forums and channels including children and young people Number of participants Consultation outputs
e	Implement communication plan	<ul style="list-style-type: none"> • Stakeholders – including staff, related bodies, children and families and the NSW community – receive clear and consistent messaging about DCJ's obligations, commitment and implementation approach to the Child Safe Scheme and the Standards • Stakeholders receive audience-appropriate targeted messaging informed by communications specialists through multiple channels and media • Best practice child safety resources and guidance are promoted and disseminated across the community and sector 	Ongoing	Child and Family	Number of people and organisations to whom key messages and material are circulated
3. Capability building					
a	Develop DCJ Risk Assessment Tool to assess departmental child safety risks	<ul style="list-style-type: none"> • Specific child safety risks are comprehensively understood across DCJ child-related contexts • Targeted approaches are identified to assessing risks for particularly vulnerable cohorts • Year on year use by DCJ business units will provide medium-long term measure of progress against Child Safe Standards. 	Sept-23 and annually to align with reporting	Child and Family	DCJ Risk Assessment Tool outputs Year on year results analysis
b	Coordinate risk mitigation strategies	<ul style="list-style-type: none"> • Child-related DCJ business areas each have a plan in place outlining actions to respond to identified child safety risks • DCJ identifies targeted approaches to addressing risks for vulnerable cohorts 	From Feb-24, following DCJ Risk Assessment Tool implementation	Child and Family	DCJ Risk Assessment Tool outputs

	Actions	Desired outcomes	Timeframe	Owner	Data points
c	Promote OCG Child Safe Self-Assessment (CSSA) and risk remediation among funded services	<ul style="list-style-type: none"> • DCJ related bodies assess child safety risks within their service contexts using the OCG's CSSA • Related bodies are encouraged (and/or obliged through contractual mechanisms) to develop responsive strategies to address identified child safety risks 	Ongoing - periodical	Child and Family Partnerships	Data held by OCG
d	Promote OCG resources on child safety, children's rights, voices of children, and supporting vulnerable cohorts	<ul style="list-style-type: none"> • Stakeholders and the community are able to access available best practice resources / learning material, including education and training to sector organisations, via online and face-to-face workshops, to support practical implementation of the Child Safe Standards. This may also include material designed specifically by the OCG for DCJ and the sector. • Staff and related bodies' knowledge of and capability in responding to child-related issues is improved 	From Feb-23	SPC (inc. Child and Family, Partnerships) CPPDYJS (inc. OSP, Youth Justice and Districts)	<ul style="list-style-type: none"> Survey results Consultation outputs Unique web page visits Activated web links
e	Scope and develop options for targeted staff learning resources	<ul style="list-style-type: none"> • Corporate learning modules and/or web or intranet content about child safety, children's rights, voices of children and supporting vulnerable cohorts are available to staff. • Staff knowledge of and capability in responding to child-related issues is improved • Train the trainer modules that increase availability of training, material and awareness 	Dec-24	Child and Family L&D	<ul style="list-style-type: none"> Number of learning modules available Number of people and organisations who complete training Training evaluation feedback Cross-analysis with DCJ risk assessment tool results

	Actions	Desired outcomes	Timeframe	Owner	Data points
4. Implementing the Child Safe Standards					
a	Develop and implement DCJ Child Safe Policy	<ul style="list-style-type: none"> • DCJ has a cohesive policy framework incorporating best practice principles of child safety • Staff can access relevant policies and procedures and know how to implement the Standards • Policies support equitability for particularly vulnerable cohorts of children and young people • Child safety and wellbeing is embedded in organisational culture, reflected in policies and procedures, and understood and practiced at all levels of work 	Feb-25	Child and Family	Policy review consultation outputs Unique webpage visits Activated web links
b	Revise and implement DCJ Code of Ethical Conduct	<ul style="list-style-type: none"> • Staff can access and apply a consolidated practical framework governing workplace behaviour in relation to children 	Feb-25	Strategic HR	Policy review consultation outputs Unique webpage visits Activated web links
c	Revise and implement DCJ Complaints Policy	<ul style="list-style-type: none"> • DCJ has a child-friendly and accessible corporate complaints policy which applies the Standards • Policies support equitability for particularly vulnerable cohorts of children and young people 	Apr-24	Enquiry, Feedback, and Complaints Unit	Incorporate the findings of the NSW Ombudsman review of the Complaints under FIC recommendation 9 Incorporate recommendations of the PwC internal audit of complaints handling Policy review consultation outputs Unique web page visits Activated web links

	Actions	Desired outcomes	Timeframe	Owner	Data points
d	Review and propose options for re-engineering complaints mechanisms	<ul style="list-style-type: none"> • Children and young people have a streamlined and child-friendly mechanism to raise safety concerns and have concerns addressed and responded to • DCJ has improved oversight and transparency of responses to complaints 	Apr-24	Child and Family	Metrics and analytics of existing channels Stakeholder consultation outputs
e	Assess other organisational policies and procedures against the Standards	<ul style="list-style-type: none"> • Policy, mandate and business process owners are engaged and aware of principles of child safety best practice • DCJ is able to form a comprehensive gap analysis of existing frameworks and processes, develop options for change and a timeline for their revision • Policies and processes support equitability for particularly vulnerable cohorts 	Dec-24	All DCJ child-related business areas	Cross-department consultation outputs
f	Consider how DCJ can utilise new or existing mechanisms to encourage implementation of the Standards among funded service providers i.e. notifiable policy, change to program guidelines template.	<ul style="list-style-type: none"> • DCJ related bodies have an increased awareness, understanding and commitment to the obligations and standards of child safe organisations 	June 2024	Partnerships	TBD

5. Review and monitoring

a	Publish CSAP in DCJ Annual Report	<ul style="list-style-type: none"> • The CSAP is given due prominence in departmental public reporting and able to be accessed by stakeholders and the community • DCJ meets its obligations as a prescribed agency under the Children’s Guardian Act 	Nov-annually	MACS	Activated links from annual report
b	Review CSAP	<ul style="list-style-type: none"> • Department-wide learnings from the first CSAP cycle are consolidated, analysed and developed into options to support continuous improvement • DCJ is able to assess the effectiveness of completed actions to support implementation of the Standards by related bodies 	Dec-26	Child and Family	CSAP review consultation outputs DCJ Risk Assessment Tool outputs and analysis Governance advice

