



Submission to the re-drafted Change for Children Strategy

About Neighbourhood Houses Tasmania

Neighbourhood Houses Tasmania (NHT) is the peak body representing the Network of Neighbourhood Houses across Tasmania (the Network).

NHT is committed to:

- ✦ being a strong peak body through providing resources, representation, policy development, advocacy, information sharing and coordination to our Members;
- ✦ resourcing strong, diverse and effective Member organisations that focus on community development to strengthen and support Tasmanian communities.

Current Context

Neighbourhood Houses Tasmania has been funded by DPAC to facilitate effective and efficient engagement between Government and the Network to respond to the Commission of Inquiry, and other Government reforms on child sexual abuse.

This project is guided by the principles identified by the Tasmanian community services sector, that keeping children safe requires:

- ✦ A focus on the prevention of harm;
- ✦ Strong, well-connected communities;
- ✦ Well-supported community organisations;
- ✦ Transparent and accountable institutions.

We are committed to supporting the Network of Neighbourhood Houses to comply with the Child and Youth Safe Organisation Framework (CYSOF), and to be safe places for children, young people, and their families.

We are committed to learning more about and promoting cultural safety and strengthening a diverse Network.

We are committed to holding the Government accountable, and to advocating for the Network and its priorities in keeping children safe.

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NHT acknowledges the traditional and original owners of the land on which we work and meet, the Muwinina people, and all palawa of lutruwita/Tasmania. We pay our respects to Elders past and present and acknowledge that this land was never ceded.



Overall feedback

This is a significant improvement on the first draft Strategy and Action Plan. It is easier to read and understand, and the 'areas for action' and 'theory of change' sections make clearer what will happen to address the issues that are explored more thoroughly in the earlier sections of the strategy. It is heartening to see some of our earlier feedback implemented, and we look forward to the development of the first Action Plan in early 2025.

We appreciated the opportunity to attend workshops in November and December 2024, although note the timing of the latter was challenging and it would have been beneficial to have more time to enable more attendees to provide feedback. It was particularly beneficial having representatives from other government agencies and commonwealth government at the November session – it will be useful to take a similar, collaborative approach to the development of the Action Plan, to ensure work remains joined up and to give community and government the opportunity to share experience. We look forward to joining the proposed working group to develop the Action Plan and evaluation framework.

We are noting an emerging risk that the emphasis on child safety, which we wholly support, is causing some organisations to reduce their engagement with children and young people out of fear of 'getting it wrong' or being falsely villainised. Of particular note is the increasing cost of insurance, and specifically the costs associated with sexual abuse insurance, which is prohibitive to the point where some organisations are making the decision to cease activities with children and young people. These factors need to be taken into consideration during development of any public information campaign or State community-wide policy.

This redraft does not go far enough to address the gaps in the child safety system that community organisations experience, particularly with accessing support from the Strong Families Safe Kids Advice and Referral Line. Without a functioning, trustworthy system that can provide timely support and advice, communities and individuals will not be able to appropriately support and protect children and young people.

We are pleased to see the inclusion of a broader public health model in understanding and responding to child safety and wellbeing, and more of a focus on the prevention of harm. We support the inclusion of a place-based approach, but think the three new approaches included (namely, public health, socioecological and place-based) need to be more clearly stated as approaches to prevention. Approaches to identification, response and healing will differ from actions to address the systemic issues that create conditions for child sexual abuse to occur. We look forward to working with DPAC to develop a plan for prevention in the community.

We welcome the following additions to the Strategy:

- ✘ Inclusion of a summary is helpful; overall this draft was much easier to read and understand.
- ✘ Acknowledgement of 'institutional betrayal of Tasmanian Aboriginal people caused by colonization...' and Aboriginal cultural safety commitment statement,



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which acknowledges 'dispossession of [Aboriginal] families, their country and their culture... continues to affect Aboriginal children to this day.'

- ✘ More research-informed consideration of underlying risks and driving factors of child sexual abuse.

Please consider our feedback alongside TasCOSS' submission of December 2024, which we support as members of the TasCOSS network.

Omissions in the current iteration

- ✘ There must be consideration of rehabilitation of perpetrators, and support and prevention work for potential perpetrators. This will be an ongoing issue as we continue to uncover more historical and contemporary cases of abuse.
- ✘ A synthesis of feedback received to date was shared at workshops, and would be useful to have available on the Change for Children website.
- ✘ This draft was shared in an early format to ensure we had some time to feedback, and we are grateful for this. However, there are in this iteration some missing or incomplete citations, which are important when making comments about societal attitudes and trends, to ensure only facts and not assumptions are being promoted.

Recommendations

- We note that the enduring statement of intent from the previous draft is no longer in this version. Given this document commits to evaluation in 2034, the enduring statement of intent may still be beneficial.
- It is useful to have clearly defined terms at the start of the document. However, the current definition of child abuse on page 9 reads that a child is able to give informed consent. Children under the age of 16 cannot consent to any sexual activity. We suggest the following amendment: 'Child sexual abuse is the involvement of a child *or young person* in any sexual activity...'
- The overview of the policy landscape in Appendix 3 is useful, but it would be helpful to have a map of which strategies sit with which government agencies, actions being taken, and a policy context narrative that clearly sets out the rationale for each piece. For example, the context narrative for Change for Children would be recommendation 19.1 of the Commission of Inquiry. It is useful to have a list of the relevant strategies, but it is currently unclear how they are interacting with each other.
 - ✘ This would address the 'confusing policies' element of the existing problem outlined on page 32 – the current environment of overlapping government strategies and action plans, and lack of clear narrative between them, makes it challenging for non-experts to navigate.



- As mentioned above, there must be recognition in the objectives section that the current child safety system is not meeting community's expectations in terms of responding to reports of child abuse.
 - ✘ Parts of this work are covered in the theory of change model, for example in medium term outcome 1.2: 'Systems, sectors and organisations connect and collaborate...' on page 59; long-term outcome 3 'Child sexual abuse is prevented through a whole of system effort and approach' on page 61; and long-term outcome 8: 'A skilled, sustainable, and resourced workforce across all relevant sectors' on page 65.
 - ✘ However, there must be a clear statement in the strategy that demonstrates that a well-funded child safety system is integral to keeping children safe.
- We support the inclusion in objective 3 that 'community organisations *receive funding* that supports quality services, collaboration with Government and other organisations, upholding child rights and safety principles, preventing abuse from occurring and sharing data responsibly.' We reiterate that ensuring children and young people are safe will take work, and needs adequate resourcing.
- Principles 6 and 7 should be amended so the language is not repetitious. We support the statements that community organisations are 'well placed to engage early with children and their families,' and that 'local governments and community organisations already play a key role in promoting safety.'
- The section on changing age dynamics on page 23 needs to properly cited, particularly the assertion that 'it is likely that [the increase in harmful sexual behaviours] has been influenced by... greater access to online sexually explicit material... [and] sexualization of adolescence.' These factors have not been addressed in the long-term outcomes.
- Similarly, the section on underlying drivers of child sexual abuse on page 27 needs to be properly cited, with a clear evidence base. The findings on page 27 in the paragraph commencing 'While the sexualisation of adolescence...' appear to come from the same source. If possible there should be inclusion of multiple sources.
 - ✘ It should be made clear in this section that researchers do not yet know *why* people commit child sexual abuse. This research is emerging but not yet conclusive.
 - ✘ We would encourage consideration of findings from the same study, including that 30% of men who had sexual feelings towards children would like more information and support.
- In the section on the intersection of Child Sexual Abuse and Family and Sexual Violence, page 30, it would be helpful to acknowledge that child sexual abuse constitutes exposing a child to sexual acts, so there can be a direct overlap.



- The section on the current situation and where do we need to go on page 32 could be made clearer with more content from the original report and diagrams by 3P.
- While we appreciate the inclusion of a place-based approach, and acknowledge NHT did not have capacity to input before this draft was released, **the distinction must be made between targeting specific locations where child sexual abuse and related factors occur, and taking a 'place-based' approach to prevention.** The current language confuses the two. We suggest the following language:
 - ✦ A place-based approach to prevention is a way of tackling the holistic issues that increase the risk of or allow child sexual abuse to occur, by putting community at the centre. The argument for community-led approaches is that those with lived experience of disadvantage are best placed to determine new ways of approaching those challenges.¹ This approach acknowledges that communities know what their needs are, and often have the tools to solve them.
 - ✦ A place-based approach to prevention empowers people and communities to develop and drive local solutions and build stronger, more cohesive, resilient communities.² It is a collaborative endeavour that seeks to create systemic change by bringing together efforts across the community to work towards shared long-term outcomes.³
 - ✦ A 'place' is a broad term: this approach could look at the Tasmanian community, local council areas, or other geographical groups.
 - ✦ Key principles of a place-based approach:
 - ✦ By the community, for the community
 - ✦ Relationship building and dialogue as a basis
 - ✦ Collaboration for change
- NHT is happy to consult further on the inclusion and wording of a place-based approach for the Strategy and Action Plan.
- The statement on page 52 that 'child protection is not core business' for services in childhood-related social policy contexts should be amended: while these services may not be funded to carry out child protection work, the Strategy puts forward that it is the

¹ Language from Collaboration for Impact, "The language of place-based and community-led change in Australia: building a shared understanding." 2022, pp1

² Based on language from Victorian Council of Social Service, "Communities taking power: Using place-based approaches to deliver local solutions to poverty and disadvantage." 2016, pp6

³ Language from Queensland Council of Social Services, "Place-based approaches for community change – QCOSS guide and toolkit." pp2, accessed via https://www.qcoss.org.au/wp-content/uploads/2019/06/20191125_Summary_Place-based-approaches-for-community-change-QCOSS-guide-and-toolkit.pdf



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responsibility of all Tasmanians to keep children safe. Moreover, the Child and Youth Safe Organisation Act means that keeping children safe has become the responsibility of these services, even if it has not explicitly been so in the past. We support the development of an integrated prevention framework that takes into account services' existing obligations, such as CYSO compliance, and is accompanied by adequate resourcing to carry out prevention work. We also suggest the following amendments to this section:

- ✦ The claim that 'children who engage in [harmful sexual] behaviours do not continue these behaviours into adulthood' needs to be cited.
 - ✦ We would support the inclusion of raising awareness and training among the general public, in addition to professionals. This would support an integrated system where many opportunities are taken to stop further abuse occurring.
- We appreciate the inclusion of 'funding partnerships between government and NGOs, and competitive funding models' as a constraint of long-term outcome 1 on page 59. This should go further and state that the unreliable nature of short-term funding agreements and grants is a barrier to any long-term effort involving the community and wider not-for-profit sector.



Prepared by Neighbourhood Houses Tasmania inc, January 2025.
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