



**Submission to the Joint Standing Committee on the
Commissioner for Children and Young People**

**Inquiry into the Monitoring and Enforcing of Child
Safe Standards**

The Youth Affairs Council of Western Australia
March 2019

Acknowledgment of Country

The Youth Affairs Council of Western Australia acknowledges the traditional custodians of country on which this report was based, the Wadjuk people of the Noongar Nation, and their continuing connection to land, sea and community. We pay our respect to them and their cultures, and to their Elders both past and present, as well as acknowledge and celebrate the ongoing contributions of their young people in our communities.

About the Youth Affairs Council of WA

The Youth Affairs Council of Western Australia (YACWA) is the peak non-government youth organisation in Western Australia. YACWA operates primarily as a human rights organisation that seeks to address the exclusion of young people in a rapidly changing society.

Our vision for Western Australia is one that celebrates and engages young people in all aspects of the community. Our role is to strengthen the trust, cooperation, collaboration, professionalism and voice of the non-government youth service sector to better serve the young people of Western Australia.

YACWA is widely acknowledged as a leader in the field of current youth participation best practice. This reputation has a national profile and is supported by academic research, proven training and project management and, most importantly, extensive engagement with children and young people. YACWA strongly believes that children and young people are the 'experts in their own experiences and wellbeing' and we are dedicated to ensuring their equal access to participation in community decision-making processes.

Executive Summary

YACWA welcomes the opportunity to provide a submission to the Joint Standing Committee on the Commissioner for Children and Young People's (the Committee) Inquiry into the monitoring and enforcing of Child Safe Standards. We believe this inquiry is a significant opportunity for the State Government to capitalise on the Royal Commission's findings to ensure Western Australian children and young people are protected from all forms of abuse.

YACWA has been closely involved in monitoring the oversight of institutions that care for or provide services to young people in Australia. We have consistently advocated for the strengthening of independent and preventative oversight and reform to meet effective standards of care for young people in areas such as child protection and youth justice. YACWA has received significant feedback from young people and the sector regarding situations where young people accessing services find themselves in a concerning situation and have an inability or a lack of support to speak up about it. As a result YACWA is unequivocally supportive of the Committee's goal to enhance measures ensuring young people are protected from abuse by greater independent oversight.

YACWA believes the enforcement of a compulsory Child Safe Standards framework is long overdue in Western Australia. It is critical that we have mandated practices in place to ensure the safety of young people in institutions that may provide care or critical services to those who are especially vulnerable.

However, we must recognise that such standards must be properly monitored and enforced. Western Australia must develop strong, statutorily independent oversight over all institutions, both government and non-government, that care for, and provide services to young people. This oversight must include robust complaint mechanisms, proactive and ongoing review of an institutional adherence to the Standards and a network of individual advocates that can provide accessible support and an avenue for complaint to any young person in need.

This is only a brief response to the Inquiry given the short turnover in the New Year. We would be happy to provide further information if the Committee wishes.

Process of this Submission

In order to inform this submission YACWA has drawn on our extensive prior research on oversight of institutions that provide services to, and care for young people. Given the short timeframe of development we have also undertaken small-scale targeted consultations with a number of youth workers and young people who have provided us with an insight into their experience with the oversight of services and accessible complaints mechanisms.

Responding to the Terms of Reference

The Terms of Reference YACWA has responded to are:

The Committee will examine the scope and direction of the work currently being undertaken by government agencies, regulatory bodies and non-government organisations to improve the monitoring of child safe standards and the role of the Commissioner for Children and

Young People in ensuring Western Australia's independent oversight mechanisms operate in a way that makes the interests of children and young people the paramount consideration. In particular, the Committee will consider the following:

- *The recommendations made by the Commissioner for Children and Young People in the report 'Oversight of services for children and young people in Western Australia';*
- *The recommendations from the 'Royal Commission into Institutional Responses to Child Sexual Abuse' relating to an independent oversight body responsible for monitoring and enforcing child safe standards; and*
- *The response from the State Government of Western Australia to the above recommendations.*

List of Recommendations

Recommendation 1

We recommend the State Government amend legislation to ensure all organisations delivering services to young people are required to meet the Royal Commission's Child Safe Standards, directing minimum standards of child safety.

Recommendation 2

The State Government take steps to support organisations to adhere to the Child Safe Standards should they shift from a voluntary to a mandatory approach. Support for organisations to comply should include:

- i) provision of appropriate timelines for compliance to allow organisations to make the necessary structural and educational changes;
- ii) capacity-building measures to support organisations providing services to young people to meet the organisational, structural and educational requirements of the Child Safe Standards;
- iii) utilisation of existing expertise relevant to the Child Safe Standards within non-government organisations, regulators and sector leaders; and
- iv) a review of the care standards that many organisations must currently be accredited in and adhere to, to ensure alignment and reduce duplication.

Recommendation 3

The Child Safe Standards be reviewed to ensure they are adaptable to meet the needs of distinct cohorts of young people who experience higher risks of harm than the general population and/or have unique needs.

This should include a specific focus on the needs of:

- Aboriginal and Torres Strait Islander young people
- Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) young people, or young people of otherwise diverse gender and/or sexuality
- Culturally and Linguistically Diverse young people
- Young people in the out-of-home-care system

This should be achieved through a partnership between the body responsible for the monitoring and oversight of the Child Safe Standards and appropriate non-government organisations, Aboriginal Community Controlled Organisations, and relevant bodies.

Recommendation 4

The State Government develop a Youth Engagement Strategy to guide the provision of clear, accessible and appropriate information on the Child Safe Standards and their impacts to young people.

Recommendation 5

The State Government form an oversight mechanism independent from government that is responsible for monitoring the implementation of the Child Safe Standards and ensuring organisational compliance with these standards. The Commissioner for Children and Young People could provide this oversight role, provided it receives sufficient resourcing.

Recommendation 6

In appointing a lead oversight body for child safety, the State Government ensure clarity of roles, jurisdictions and functions is maintained among existing oversight bodies in Western Australia.

Recommendation 7

The Government ensure legislative requirements to comply with the Standards cover the list of institutions that are provided in recommendation 6.9 (see appendix 2) of the Royal Commission's Final Report.

Recommendation 8

The State Government ensure the lead body responsible for oversight of the Child Safe Standards is entrusted with the following key functions:

- i) Oversight of organisational facilities and compliance monitoring for the Child Safe Standards;
- ii) Systemic advocacy functions with the power to monitor laws, policies and practices that concern children and young people and provide recommendations to Parliament for reform; and
- iii) Investigative powers to support individual advocacy and complaints management relevant to the implementation (or lack thereof) of the Child Safe Standards.

Recommendation 9

Establish a Commissioner for Aboriginal Children and Young People either within the existing office of the Commissioner for Children and Young People or in direct partnership with the existing Commissioner to ensure culturally appropriate access to oversight and advocacy for Aboriginal children and young people.

Introduction

'The sexual abuse of children has occurred in almost every type of institution where children reside or attend for educational, recreational, sporting, religious or cultural activities...

Society's major institutions have seriously failed. In many cases those failings have been exacerbated by a manifestly inadequate response to the abused personⁱ

[...]

Protecting children and promoting their safety is everyone's business. It is a national priority that requires a national response. Everyone – the Australian Government and state and territory governments, sectors and institutions, communities, families and individuals – has a role to play in protecting children in institutionsⁱⁱ

– Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission)

YACWA feels that is appropriate to commence this submission with this excerpt from the Royal Commission's Final Report as it succinctly highlights the damage experienced by so many children and young people in Australia as a result of decades of systemic inaction, and an emphasis on self-preservation over rights and safety of children and young people. Consequently, it is of critical importance that the work this Inquiry does ensures Western Australia's institutions are safe for children and young people to live, grow and learn in an environment free from abuse.

YACWA operates primarily as a human rights organisation that works to ensure that young people in Western Australia are treated in alignment with the [Convention on the Rights of the Child](#). It is clear from the results of the Royal Commission that Australia has failed to adhere to multiple articles under the convention, and we as a nation should not look away from these past failures and injustices. Given the Royal Commission's work on child safe institutions is based on the Convention it is critical that we do not lose sight of them. A list of these articles is provided in **Appendix 1**.

We cannot ever make it up to the thousands of individuals in Australia who have had "their innocence stolen, their childhood lost, their education and prospective career taken from them and their personal relationships" nor can we fully heal the "trauma they can never escape."ⁱⁱⁱ All we can do is use the findings from the Royal Commission and all that is being done as a result, such as this Inquiry, to ensure that no child or young person ever suffers from abuse or trauma of any kind at the hands of an individual that professes to care for them and as part of an institution they are supposed to trust.

Implementation of Mandatory Child Safe Standards in Western Australia

Organisations providing services to young people should be required to adhere to the Child Safe Standards

YACWA's submission is predicated on general agreement with the Child Safe Standards in their current form. We reiterate our support for the introduction of mandatory standards that all institutions that have access to young people should abide by. Despite this, simple adherence to the standards cannot be the epitome of what is required of organisations to be child safe. A University of New South Wales Study commissioned by the Royal Commission into key elements of child safe organisations identified that the most likely unintended and high-impact consequence of the use of a Standards Framework is that *'compliance could become a procedural tick-box process, rather than creating genuine change'^{iv}*.

Systemic and cultural change is required if we are to completely root out the systemic inadequacies that facilitated decades of institutional abuse. The standards must influence all aspects of an organisation's general practice and interactions with children and young people. This includes:

- hiring staff based on their demonstrated commitment to adherence to the standards;
- ongoing training for staff working in organisations required to comply with the standards;
- organisational support; and
- monitoring to ensure all decisions made and actions taken are with child safety as the defining principle.

The nature of the Standards is complex and will require concerted efforts for organisations to comply with them. As such, the standards cannot simply be voluntary guidelines that institutions can self-regulate. This is supported by the Royal Commission, which found number of institutions, when given the responsibility of investigating child sexual abuse, responded inadequately and inappropriately^v. The Royal Commission's conclusion was that institutions might not implement all of the Child Safe Standards unless required to do so. We support the Royal Commission's recommendation that *"a strong centralised form of a direct regulation and program delivery is required to protect children from institutional sexual abuse, and that it allows a proportional response"^{vi}* which was evidenced throughout their case studies and stakeholder consultations.

Recommendation 1

We recommend the State Government amend legislation to ensure all organisations delivering services to young people are required to meet the Royal Commission's Child Safe Standards, directing minimum standards of child safety.

Organisations must be supported through child safety reforms

Whilst standards for organisations delivering services to young people should be mandatory, it must be acknowledged that organisations will need time and support to meet the

organisational, educational and structural requirements of the standards. As such we believe the Government should take a staged approach when implementing the standards for all organisations and services that work with young people to adhere to. We support the Royal Commissions assertion that capacity building should be a key component of implementing the standards.

Government must provide the necessary investment of resources as well as utilise the expertise of sector regulators, peak bodies, sector leaders and other bodies to better support institutions^{29/ii}. The vast majority of non-government organisations will not be able to build their capacity to meet the Standards without first receiving increased investment and support from the Government.

We also suggest that a **review is conducted that explores the care standards that many organisations currently must be accredited in and adhere to.** These may encompass elements of the proposed Standards and as such attention will need to be given to whether the proposed Standards will supersede existing accreditations or whether they will be adapted on an organisational basis to mitigate gaps and overlap as well as reduce the regulatory burden on organisations.

Recommendation 2

The State Government take steps to support organisations to adhere to the Child Safe Standards should they shift from a voluntary to a mandatory approach. Support for organisations to comply should include:

- v) provision of appropriate timelines for compliance to allow organisations to make the necessary structural and educational changes;
- vi) capacity-building measures to support organisations providing services to young people to meet the organisational, structural and educational requirements of the Child Safe Standards;
- vii) utilisation of existing expertise relevant to the Child Safe Standards within non-government organisations, regulators and sector leaders; and
- viii) a review of the care standards that many organisations must currently be accredited in and adhere to, to ensure alignment and reduce duplication.

Standards for child safety must be responsive to diversity among young people

Abuse can take many forms and can manifest in unique ways that disproportionately affect vulnerable demographics. The standards cannot be limited only to preventing child sex abuse, they must broadly take into account and address abuse in all forms and allow for flexibility to adapt to protect and meet the needs of groups of children and young people that are particularly vulnerable. One young person we spoke to during our consultations described how his mental and emotional wellbeing was detrimentally harmed by a lack of

support from a gender transitioning service that was actively refusing to provide the support that he was legally obligated to during his transition. His concerns and those of many others were ignored by the internal complaints system of the service and it was only when he sought the counsel of practitioners external from the service that he was able to get the support he needed and be empowered to facilitate a change in practice from the service.

Other examples from our research that could be considered abuse include denying an Aboriginal and Torres Strait Islander child or young person the connection to culture and family and rejecting an LGBTIQ+ child or young person from crisis accommodation based on their gender identity.

Recommendation 3

The Child Safe Standards be reviewed to ensure they are adaptable to meet the needs of distinct cohorts of young people who experience higher risks of harm than the general population and/or have unique needs.

This should include a specific focus on the needs of:

- Aboriginal and Torres Strait Islander young people
- Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) young people, or young people of otherwise diverse gender and/or sexuality
- Culturally and Linguistically Diverse young people
- Young people in the out-of-home-care system

This should be achieved through a partnership between the body responsible for the monitoring and oversight of the Child Safe Standards and appropriate non-government organisations, Aboriginal Community Controlled Organisations, and relevant bodies.

Young people must be informed of the impacts of child safety standards

No matter how robust or well implemented the Standards are, they will only be effective if children and young people are aware of their existence and are empowered to protect their rights under the standards and advocate on behalf of themselves with the support of an independent oversight system. The Standards provide an opportunity for the State to empower young people who are often denied agency and understanding. By developing a clear and robust set of standards, an opportunity presents itself to communicate these standards and rights to the young people they are intended to serve.

Recommendation 4

The State Government develop a Youth Engagement Strategy to guide the provision of clear, accessible and appropriate information on the Child Safe Standards and their impacts to young people.

Oversight of services for children and young people in Western Australia

Oversight mechanisms for child safety must be strengthened

YACWA unequivocally agrees with CCYP's conclusion that "*the lack of preventive monitoring is, in many respects, characteristic of Western Australia's oversight arrangements generally.*"^{viii} There is also a general lack of comprehensive individual advocacy support which compromises the effectiveness of oversight systems as particularly vulnerable children and young people often lack an accessible avenue for complaints.

Currently the effectiveness of oversight bodies is often dependent on the willingness of a department to accept and respond to those oversight bodies' recommendations. If the Standards were made mandatory, any oversight system would need the power to compel any organisation to modify their services to meet these standards, and as such this should be enshrined into legislation.

YACWA has often been critical of Western Australia's oversight arrangements for institutions that care for children and young people, particularly WA's child protection and youth justice systems. In our 2019/20 Pre-Budget Submission, we noted that "*the lack of independent oversight of Western Australia's out of home care system is grossly inadequate. Young people are exceptionally vulnerable to abuse in residential settings, so an independent advocate is essential to support young people especially in addressing issues of abuse*"^x. This is only one such example of the many gaps that currently exist in Western Australia's systems of institutional oversight and as such the importance of this inquiry's conclusions in this regard cannot be understated.

The Commissioner for Children and Young People has had a longstanding role in providing effective systemic advocacy, proactive research and oversight in Western Australia and is well placed to take on a high-level role of oversight and compliance mentoring. However, the current capacity of the office of the Commissioner for Children and Young People is limited and we have a significant concern that the Commissioner's focus on systemic advocacy might be diminished if it were to be given greater responsibility of oversight and compliance monitoring and so the commissioner's office would need to be sufficiently resourced to meet this dramatically increased responsibility.

Oversight mechanisms must remain independent from the government-of-the-day

In order to ensure that an oversight system is effective, it must have statutorily mandated independence from Government as well as robust investigative powers. Evidence from children and young people themselves shows that they are much more likely to access as a complaints mechanism and seek help if the oversight system available is wholly independent from the service or institution they are accessing^x. Whilst maintaining its independence this system must also be able to directly report to parliament so that it is able maintain a broader scale of accountability rather than simply conducting bilateral discussions with individual departments.

Recommendation 5

The State Government form an oversight mechanism independent from government that is responsible for monitoring the implementation of the Child Safe Standards and ensuring organisational compliance with these standards. The Commissioner for Children and Young People could provide this oversight role, provided it receives sufficient resourcing.

Collaboration amongst existing statutory bodies is key to effective oversight

The Commissioner's Report into the *Oversight of Services for Children and Young People in Western Australia* highlights in detail the significant gaps and overlap that currently exist in Western Australia's oversight services for children and young people. Some have very different powers, scope and functions, and others lack the legal functions necessary to hold organisations to account. YACWA commends this as a great analysis of the current landscape however we do not support recommendations advocating for the creation of multiple independent oversight bodies for often siloed service systems such as out of home care and youth justice.

Any new oversight system must be an overarching entity that is statutorily empowered and resourced to provide institutional oversight, monitoring of organisational compliance to the Standards, and systemic and individual advocacy for all children and young people in Western Australia who require it. The jurisdiction of this system must cover all organisations that have any kind of interaction with children and young people, not only those that are managed or funded by the Government. All children and young people should be entitled to access strong oversight and complaints mechanisms, whether they are in institutions such as out of home care or juvenile detention or accessing mainstream services such as health, education and sporting clubs.

Given the range of bodies currently in Western Australia possessing unique subject matter expertise (such as on youth justice), it is impractical that these consolidate into a single body overseeing all elements of child safety. As such, it is imperative that clarity on roles, jurisdiction and powers is provided to these bodies.

Recommendation 6

In appointing a lead oversight body for child safety, the State Government ensure clarity of roles, jurisdictions and functions is maintained among existing oversight bodies in Western Australia.

Recommendation 7

The Government ensure legislative requirements to comply with the Standards cover the list of institutions that are provided in recommendation 6.9 (see appendix 2) of the Royal Commission's Final Report.

Oversight mechanisms will require specific powers to maintain efficacy

Any proposed independent oversight system should be entrusted with three key functions. These functions are all of equal importance and should be given commensurate resourcing to ensure that none are neglected in practice. These functions are:

1. **Oversight of organisational facilities and compliance monitoring for the child safe standards:** The system should have strong investigatory powers to conduct proactive and ongoing inspections of institutions that interact with young people. As part of these inspections the system should ensure that each organisation is upholding the principles of the child safe standards and should have the power to compel change and determine penalties for non-compliance.
2. **Systemic advocacy:** The system should have the power to monitor laws, policies and practices that concern children and young people and provide reports and recommendations to parliaments to address structural flaws in both policy and institutions that fail to properly meet the standards required to keep children and young people safe.
3. **Individual advocacy and complaints management:** The system should incorporate a wide network of individual advocates who can act an avenue for young people to make complaints and subsequently as a support for them to work through this process. These advocates should be made well known to children and young people and should establish a relationship and monitor them throughout their entire journey throughout institutionalised care or detention. If a child or young person has suffered from abuse, then the advocate can work with trauma informed services to support them through the healing process. Queensland's Community Visitor Program is a good example of individual advocacy for the Committee to consider. It has statutory responsibility to visit children or young people in foster homes, homes of kinship carers, residential care facilities, youth detention or adult correctional centres, disability services and mental health facilities. This program is built on the premise that effective advocacy "builds trust and relationships through empowering and engaging children and young people to speak out, knowing that when they do, they will be listened to, taken seriously, and action will be taken"^{xi} and as such has demonstrated effectiveness in protecting young people from abuse in care and in giving adequate support if abuse has occurred.

Recommendation 8

The State Government ensure the lead body responsible for oversight of the Child Safe Standards is entrusted with the following key functions:

- iv) Oversight of organisational facilities and compliance monitoring for the Child Safe Standards;
- v) Systemic advocacy functions with the power to monitor laws, policies and practices that concern children and young people and provide recommendations to Parliament for reform; and
- vi) Investigative powers to support individual advocacy and complaints management relevant to the implementation (or lack thereof) of the Child Safe Standards.

Acknowledging Aboriginal children and young people are often the majority not minority in institutional care

Given that Aboriginal children and young people are vastly overrepresented in institutional settings such as out of home care and juvenile detention, it is vital that Aboriginal Community Controlled Organisations (ACCOs) are empowered to work with the oversight system to provide individual advocacy and address the complaints of Aboriginal children and young people accessing services or in institutional settings.

The Learnings from the message stick report noted that *“For there to be any chance of improving the overwhelming disadvantage suffered by Aboriginal people, the Western Australian Government must collaborate and coordinate efforts with Aboriginal people and communities to ensure that the services delivered are the services needed by and suitable for particular communities.”*^{xii}

Not only must the oversight system have strong partnerships with the Aboriginal community, but there must also be a role to represent Aboriginal children and young people that is statutorily mandated within the system itself. Currently many other jurisdictions in Australia have a Commissioner for Aboriginal Children and Young People. This review is an opportunity for Western Australia to develop this office in order to provide culturally appropriate access Aboriginal children and young people. The ongoing effects of institutional racism and underfunding of ACCOs to provide culturally based programs and support^{xiii} has meant that Aboriginal children and young people may experience fear or a lack of trust when speaking out. A Commissioner for Aboriginal children and young people would provide a culturally accessible means for Aboriginal children and young people to access the oversight system and make a complaint.

Recommendation 9

Establish a Commissioner for Aboriginal Children and Young People either within the existing office of the Commissioner for Children and Young People or in direct partnership with the existing Commissioner to ensure culturally appropriate access to oversight and advocacy for Aboriginal children and young people.

Concluding Remarks

The Royal Commission into Institutional Responses to Child Sexual abuse uncovered some of the most heinous and damaging crimes in Australian history. All Australian Governments have a responsibility at this time to listen to the findings of the Royal Commission, and take committed, decisive action to safeguard the wellbeing of future children.

In this submission, YACWA has outlined clear steps and requirements for the State Government to create a safer Western Australia for all young people. In brief, this has touched upon:

- Recognising existing expertise;
- Partnering with communities;
- Providing consistency to services; and
- Clarity of functions.

In a community, the safety of our young people is paramount. Where the services created by adults and governments fall short, we have failed our young people. We urge the Committee to have the courage to consider and recommend significant overhauls that would do justice to vulnerable young people in Western Australia.

We look forward to supporting the Committee as it carries out its inquiry.

Ross Wortham

Chief Executive Officer

March 2019

Appendix 1

Relevant articles under the United Nation's Convention of the Rights of the Child

Article 3 – All organisations concerned with children should work towards what is best for each child.

Article 4 – Governments should make these rights available to children.

Article 6 – Children have the right to live a full life. Governments should ensure that children survive and develop healthily.

Article 12 – Children have the right to say what they think should happen when adults are making decisions that affect them and to have their opinions taken into account.

Article 19 – Governments should ensure that children are properly cared for and protect them from violence, abuse and neglect by their parents, or anyone who looks after them.

Article 20 – Children who cannot be looked after by their own family must be looked after properly by people who respect their religion, culture and language.

Article 25 – Children who are looked after by their local authority rather than their parents should have their situation reviewed regularly.

Article 34 – Governments should protect children from sexual abuse.

Article 36 – Children should be protected from any activities that could harm their development.

Article 37 – Children who break the law should not be treated cruelly. They should not be put in a prison with adults and should be able to keep in contact with their family.

Article 39 – Children who have been neglected or abused should receive special help to restore their self-respect.

Appendix 2

Recommendation 6.9 of the Royal Commission Into Institutional Responses to Child Sexual Abuse – Making Institutions Child Safe

Legislative requirements to comply with the Child Safe Standards should cover institutions that provide:

- a) accommodation and residential services for children, including overnight excursions or stays
- b) activities or services of any kind, under the auspices of a particular religious denomination or faith, through which adults have contact with children
- c) childcare or childminding services
- d) child protection services, including out-of-home care
- e) activities or services where clubs and associations have a significant membership of, or involvement by, children
- f) coaching or tuition services for children
- g) commercial services for children, including entertainment or party services, gym or play facilities, photography services, and talent or beauty competitions
- h) services for children with disability
- i) education services for children
- j) health services for children
- k) justice and detention services for children, including immigration detention facilities
- l) transport services for children, including school crossing services.

Reference List

- ⁱ The Royal Commission into Institutionalised Child Sexual Abuse. (2017) *Final Report*, p.3. Retrieved from https://www.gov.au/sites/default/files/final_report_-_preface_and_executive_summary.pdf
- ⁱⁱ *ibid* p.4.
- ⁱⁱⁱ *Ibid*, p.2.
- ^{iv} University of New South Wales. (2016) *Key Elements of Child Safe Organisations – Research Study Final Report*, p, 4. Retrieved from https://www.childabuseroyalcommission.gov.au/sites/default/files/file-list/research_report_-_key_elements_of_child_safe_organisations_research_study_-_prevention.pdf
- ^v Royal Commission into Institutionalised Child Sexual Abuse. (2017) *Final Report – Improving institutional responding and reporting (volume 7)*, p.244. Retrieved from https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_7_improving_institutional_responding_and_reporting.pdf
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- ^{viii} The Commissioner for Children and Young People. (2017). *Oversight of services for children and young people in Western Australia*, p. 81. Retrieved from
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- ^x The Commissioner for Children and Young People. (2016). *Speaking Out About Raising Concerns in Care – the views of Western Australian children and young people with experience in out-of-home care*, p.9. Retrieved from <https://www.ccyp.wa.gov.au/media/2327/speaking-out-about-raising-concerns-in-care-website-version.pdf>
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^{xii} Education and Health Standing Committee. (2016). *Learnings from the message stick – The report of the Inquiry into Aboriginal youth suicide into remote areas*, p.130.

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^{xiii} *ibid*, p.ii.

