



Submission for the Child Safety Annual Reporting Framework Proposed Model Consultation

Our holistic support to children, young people, and families

Parkerville Children and Youth Care is a For Purpose organisation that supports children, young people, and their families to build skills and capacity, address the impacts of trauma and adverse childhood experiences, and develop capabilities that will enable them to be the best versions of themselves.

We see a future where Western Australia is the safest place in the world and all children, young people, and their families feel safe to dream, to thrive, and to reach their fullest potential.

We have been working alongside vulnerable children, young people, and their families for over 120 years, and every year, we support more than 13,000 people across WA through our therapeutic, out of home care, youth, and education services. The future of those we serve depends on what we do in the present to support them to reach their potential.

Our Purpose

Our purpose as an organisation is to support children, young people, and their families to build skills and capacity, address the impacts of trauma and adverse childhood experiences, and develop capabilities that will enable them to be the best versions of themselves.

Our Vision

We see a future where Western Australia is the safest place in the world and all children, young people, and their families feel safe to dream, to thrive, and to reach their fullest potential.

Our Values

As a strong, values-based organisation, we are dedicated to an ongoing journey of self-awareness, learning and improvement in everything we do because the children and young people with whom we work deserve nothing less.



Bold and courageous: We stand up for what is right and amplify the voices of the children, young people, families, and communities we support.



Curious and humble: We search out information and data that will help us remain at the forefront of all that we do.



Caring and respectful: We acknowledge and embrace the diversity and individuality of everyone we meet and those we serve.



Hopeful: We believe in the power of positivity and are optimistic about change, having faith that together we can overcome any challenge we may face.



Truthful and accountable: We are committed to being open, honest, and taking responsibility for our actions.





Parkerville CYC's services

Therapeutic Services

- **Multi-agency Investigation and Support Team (MIST):** co-located, multi-disciplinary, trauma-informed model to reduce harmful impacts of trauma from abuse. It is WA's first truly integrated child sexual abuse (CSA) response, with Child Advocacy Centres in Armadale (2011), Midland (2019), and Rockingham (2024). MIST's core principle is to reduce instances of children having to tell and re-tell their story, and coordinate services (including Police) to wrap around the child and family, through collaboration and knowledge-sharing.
- **Therapeutic Services:**
 - CSATS:** We provide a Child Sexual Abuse Therapeutic Service (CSATS) in a regional area of WA.
 - PACTS:** We also provide a Parents and Children's Therapeutic Service (PACTS) in a northern Perth suburb. 84% of children and young people receiving a service had experienced child sexual abuse.

Out of Home Care

- Parkerville CYC have had children in our care for the entirety of our 122-year history. We are implementing an innovative, award-winning new model, Our Way Home: radically personalised shared care, that focuses on the needs and desires of each child, and deliberately seeking to establish, maintain and deepen connections between children and their families. We care for children through a mixed provision across family group homes, foster care, and temporary care homes.

Early Intervention, Prevention and Youth Services

- **Child and Parent Centres (CPCs):** Parkerville runs two CPCs in Perth, servicing 12 primary schools in vulnerable communities. The centres work to create an entry point into the school system and help with school readiness, but importantly they focus on increasing family capacity and help them provide appropriate developmental experiences and a happy, healthy home.
- **Head to Health Kids Hub:** a new to provide comprehensive mental health and wellbeing services for children aged 0-12 years, targeting mild to moderate emerging complexity. This service is a collaboration with Koya Aboriginal Corporation, Pregnancy to Parenthood, Lifespan Psychology Services, and MIFWA, and became operational in January 2025.
- **Education Employment and Training Program (EET):** For young people at extreme educational risk due to trauma, mental health, family issues
- **Support and Community Services (SACS):** For families with children aged 4-14 that are experiencing homelessness, or at risk of homelessness and living in supported accommodation.
- **Moving Out, Moving On (MOMO):** service for young people aged 15-21 who are experiencing homelessness, or at significant risk of homelessness or transience.
- **Reconnect:** a diversion and early intervention service for families with young people (12-18) at risk of homelessness or family breakdown.
- **Young Women's Program:** medium-term accommodation and support for young women (including those with children) aged 16-25 experiencing or at risk of homelessness, or who need help to live independently.
- **Ruby's Reunification Program:** seeks to prevent youth homelessness through part-time accommodation, whilst engaging and supporting the family with counselling and practical support. It aims to foster hope for staying together or reunification, and keep young people out of the youth (and ultimately adult) homelessness sector.



Introduction

Parkerville Children and Youth Care (Parkerville CYC) values the opportunity to contribute to the consultation on the Child Safety Annual Reporting Framework. Our organisation is deeply committed to the safety and wellbeing of children, young people, and families. This commitment is reflected in our long-standing history of providing holistic support and our continuous efforts to enhance our practice. We believe that the proposed framework will play a vital role in promoting accountability and transparency for child safety, and we welcome the opportunity to collaborate with the National Office and other stakeholders to ensure its successful implementation

Parkerville's Child Safe Journey

Parkerville was the first organisation in Western Australia to achieve Child Safe accreditation with the Australian Childhood Foundation. We are dedicated to the safety and wellbeing of children and young people. Parkerville consistently adheres to the highest ethical standards, and is in full alignment with Australia's National Child Safe principles.

Parkerville's History and Apology

Parkerville (originally Parkerville Children's Home) has been providing residential care in Western Australia for children and young people, who for various reasons were unable to live with their families, since 1903. We acknowledge with deep sorrow and regret that at certain times in our history we failed some of those children and young people. We have issued a sincere and heartfelt public apology to those who did not receive the best quality care, and to those who may have experienced physical, sexual, or psychological abuse whilst under our care, recognising that such trauma may have left an immeasurable and lasting impact on the individual, their families, friends and communities.

Our apology emphasises that to prevent this from happening again, Parkerville has adopted a multitude of prevention strategies, informed and scaffolded by our Child Safe culture, to ensure that the mistakes – and the trauma – of the past are not repeated. We work to 'interrupt' predatory behaviours by thoroughly screening staff and volunteers, and by modifying risky environments (such as by improving physical structures, policies and supervision practices) so that it is harder for would-be perpetrators to behave as they did in the past. We have established mechanisms to proactively seek out the views of, listen to, and respond to children, and in particular, their views about their safety and their wellbeing.

Journey to accrediting as a Child Safe Organisation

In light of this history, with a firm commitment to preventing any return to a lax or careless culture around child safety and wellbeing, and in alignment with our purpose and values, Parkerville initiated the process of accreditation as a Child Safe Organisation by the Australian Childhood Foundation in 2016. We were subsequently re-accredited in 2019 following another thorough, extensive audit of our practices, culture and compliance mechanisms.



Parkerville undergoes external audits by the Australian Childhood Foundation every three years. These audits involve comprehensive reviews of our child safe practices, including their presence in our documentation and the extent to which they are ingrained in our organisational culture. The process is highly thorough and consultative, and has significantly contributed to Parkerville's leading child safe position, and confidence across the organisation that child safety is firmly and meaningfully threaded through everything that we do.

Evolution in our Child Safe Ethos and Approach

Through this process, we have learnt that policies and procedures alone are not enough to keep children safe and well in organisational settings. As a Child Safe Organisation, we need to consciously and systematically create an environment and culture, as well as adopt strategies and take actions to promote wellbeing and prevent harm to children and young people. After a period of change in the organisation, in 2021 a review was undertaken of our Safeguarding Children program to assess what is currently happening, what is not happening, and what should be happening going forward. Everything that we do at Parkerville is centred around the children and young people that we serve, and they deserve nothing less than to be supported by a strong, values-based organisation committed to continuous reflection and improvement. It is within this spirit that a robust and wide-ranging review was undertaken. The high-level review focused on three key Safeguarding Children domains: organisational culture, organisational processes, and organisational environment.

1. Organisational Culture:

- The review highlighted the importance of creating an environment and culture that consciously and systematically promotes the wellbeing and safety of children and young people.

2. Organisational Processes:

- The review emphasised the need for rigorous recruitment, training, and governance processes to ensure the safety of children.

3. Organisational Environment:

- The review found that policies and procedures alone are not enough to keep children safe. It is essential to adopt strategies and take actions to promote wellbeing and prevent harm to children and young people.

4. Continuous Improvement:

- The review highlighted Parkerville's commitment to continuous improvement and adapting to new standards and recommendations.

In response, we strengthened existing, or established new, processes and practices to embed greater rigour and organisational culture change in our child safe approach. This includes:

- Stronger mechanisms to listen to and respond to children and young people, and in particular, their views about their own safety and wellbeing.
- Regular audits of Parkerville's operations framework benchmarked against a set of evidence-based standards.
- A Child Safe Officer and Child Safe Committee (comprised of Child Safe Champions selected from each service area), responsible for building a culture of child safe practice through communication, education, awareness, and support to all staff and volunteers. They monitor

and drive continuous improvement in child safe practices, and report to senior leadership and the Board regularly and as required, including through structured mechanisms.

- A comprehensive reporting process to identify and deal with any suspicions or disclosures of child abuse efficiently and appropriately; alongside comprehensive training to support appropriate application of all relevant procedures.

This review catalysed what we know from our history and our multi-faceted/multi-disciplinary practice: strategies – and indeed, accreditation processes - only fulfil their intended function if the culture and appetite is present within the organisation to uphold these values and practices.

Progression to organisational maturity in Child Safe culture and practice

As our accreditation journey and 2021 review demonstrated, Parkerville is committed at its core to Child Safe, and to the regular reflection and continuous improvement processes that mitigate the risk of complacency that could come from a compliance-only-driven approach.

The accreditation, re-accreditation, and audit processes have served a hugely significant purpose in setting a benchmark of excellence for Parkerville to meet. The standards, resources, expert and peer input, and other resources have helped Parkerville to develop to a point of maturity, in which understanding of and commitment to child safe is sufficiently embedded and embraced to enable the organisation to move away from external accreditation/audit processes.

This has a very practical benefit. Child Safe accreditation costs organisations tens of thousands of dollars every year. This is a significant cost for organisations delivering frontline services, and how best to direct limited resources is always a priority consideration. Moreover, aligning Parkerville's Child Safe compliance with the Australian Childhood Foundation standards, the National Child Safe Standards, and other requirements like the WA Reportable Conduct Scheme, creates a significant administrative burden – particularly in the context of a formal accreditation process.

Child Safe as Business-As-Usual: Integration and Embeddedness

By accrediting almost 10 years ago and continuing to build from this base of best practice, child safe has become interwoven in the fabric of who we are, how we design and deliver services, how we recruit and manage staff, how we engage with stakeholders and form partnerships and collaborations, and crucially, how we support and engage with the children, young people, and families that we serve.

Parkerville has therefore reached a point of organisational maturity with our child safe culture, ethos and practice, notwithstanding our commitments under the ACF accreditation. This can be seen across a suite of processes and practices, standards, and cultural markers that are measurable, transparent, and cross all areas of the organisation. These include:

- Developing a Parkerville Child Safe Practice Framework and Practice Guide.
- Developing tools to assess and monitor our compliance with Parkerville's internal standards related to Child Safe, and with the National Principles.
- Aligning Parkerville's existing mechanisms and processes to the National Child Safe Principles, including demonstrating that the Principles are being met via internal monitoring and reporting systems.
- Reporting at all levels of Governance, including regular reporting to the Senior Leadership Group and to the Parkerville Board of Directors.

- Mandatory Child Safe training for all staff, with stepped levels of further training for frontline staff, and additional training offers that contribute to building and maintaining a culture that approaches child safety and wellbeing holistically and with respect to the intersections and complexities of children's and young people's experiences (such as Therapeutic Crisis Intervention, Protective Behaviours, De-escalation Skills, and Cultural Awareness).
- A thorough and robust suite of Policies and Procedures that either explicitly establish our Child Safe commitment and expectations in alignment with related standards/compliances, or embed Child Safe as part of routine practice (for instance, our policies and procedures related to privacy, consent and confidentiality, People and Culture, feedback and complaints).
- Integrating Child Safe into service design, delivery, and outcomes measurement (see next section).

An expansive approach to Child Safe

Truly embedding and integrating Child Safe into the fabric of the organisation has, by intent and necessity, led us to reflect in a more expansive manner about how our practice aligns with the principles of creating a child-safe culture and environment – for instance, how it is not possible to separate a trauma-informed approach from a child safe one, or how a child's safety and wellbeing should be prioritised within the context of their family and community.

As such, we have developed a series of Practice Guides that map Parkerville's approach to practice, underpinned by our guiding principles, practice examples and reflective questions. These Guides are a critical mechanism by which we work to embed continuous reflection and consideration about child-centred, trauma-informed and systemic practice.

Similarly, Parkerville's Outcomes Framework is infused with and entirely shaped by our child safe ethos. The Framework emphasises accountability, continuous improvement, and evidence-based service delivery under 5 Pillars (Safe, Connected, Thriving, Equipped, and Dream) – it promotes reflective and radically personalised approaches to measuring the impact of our work; hearing the views and voices of the children, young people and families that we serve, and taking the opportunity to reflect with them about their responses.

Therefore, whilst compliance-led models have their place, particularly in the early stages of an organisation's journey - Parkerville sees Child Safe as part of an interlaced fabric across our practice.

Reflections on the proposed model

Overview and Objective

We welcome the focus on embedding the National Principles for Child Safe Organisations. The Principles themselves are a powerful statement of commitment and intent towards root-and-branch embedding of child safety. However, true integration of the Principles requires supports and scaffolds – particularly to increase cross-sectoral take-up across the board, and especially for organisations with less direct experience of child safety standards. We welcome the principle of the Proposed Framework as a way to create greater consistency of understanding and meaningful implementation.



Voluntary and accessible to all

A voluntary approach allows for flexibility and encourages a wide range of organisations to participate without the constraints of mandatory compliance. However, we recommend that the framework includes incentives to encourage organisations to commit, such as a public recognition or certification.

Capability Building & Sharing Good Practice

Small to medium-sized organisations must be able to access resources which allow them to implement the National Principles consistently and in line with larger organisations.

Leveraging existing reporting mechanisms and explore additional accountability mechanisms

1. **Type of Work and Reporting Impact:** The nature of work significantly influences what gets reported. For instance, a psychologist's interactions with children differ from those of a therapeutic carer in an out-of-home care setting who is with the child for extended periods of time. The psychologist may report in the context of therapeutic progress and behavioural observations, whilst the carer has a much more prolonged and complex picture built up through day-to-day care and multi-relational experiences. It is worth recognising the inherent challenge of high-level reporting within organisations (like Parkerville) that engage with children across a broad spectrum of interactions, experiences and needs, and the context and nature of each role to ensure accurate and meaningful reporting.
2. **Complex Behaviours and Reporting Nuances:** Children may exhibit complex behaviours at particular times or in different contexts, which require nuanced understanding. Any guidance or tools included as part of the Framework should recognise the need for organisations to have mechanisms to filter and contextualise such reports, including individual and cohort-level trends over time.
3. **Alignment of Reporting Requirements Across Sectors:** Aligning reporting requirements for diverse organisations, such as sports clubs and those providing daily care to children, presents unique challenges. While it is important to have broad and flexible reporting mechanisms, they should not be so broad that they become meaningless. Sports clubs may focus on safeguarding policies and incident reporting, whereas organisations with children in daily care will likely need to report on a wider range of interactions and incidents. The framework should provide clear guidelines that accommodate the specific needs and contexts of different sectors while maintaining a consistent standard of child safety.
4. **Balancing Flexibility and Accountability:** The framework should strike a balance between flexibility and accountability. While it is important to allow organisations to align reporting with their existing mechanisms, there must be clear criteria and standards to ensure meaningful and consistent reporting. This includes providing tailored templates, training, and resources to assist organisations in understanding and implementing the framework effectively.

Flexible alignment with existing reporting requirements

The proposed Child Safety Annual Reporting Framework acknowledges the diverse contexts in which organisations operate and the varying processes to which they adhere, such as the National Standards for Out-of-Home Care. It is crucial that the framework remains flexible to accommodate these existing reporting mechanisms, whilst ensuring comprehensive child safety reporting.

1. **Consideration for Children in Care of the CEO:** The framework must take into account the specific processes and standards that apply to children in the care of the CEO, such as the National Standards and in WA specifically, the Better Care, Better Services Standards. These children are subject to rigorous oversight and reporting requirements, and the framework should align with these existing processes to avoid duplication and ensure consistency in reporting, including efforts to minimise additional reporting burden.

Additionally, it is crucial to include the WA Ombudsman Reportable Conduct Scheme, as it is a critical driver for developing an integrated model that captures the correct information once, and uses it specifically in all reporting contexts.

2. **Transition from Voluntary to Mandatory Reporting:** While the framework is currently proposed as non-mandatory, it seems reasonable to posit that it might not remain so, and laying the foundations for a potential transition to mandatory reporting in the future should therefore be considered. This would enable organisations earlier in their child safe journey to prepare for more stringent reporting requirements, and develop or adapt their processes accordingly. Even if the framework remains voluntary, it should include provisions that encourage organisations to consider the implications of, for example, mandatory reporting.

Additionally, the introduction of buy-in levels could be considered. For example, larger and/or more 'child safe mature' organisations like Parkerville can and would fully commit, whereas smaller Not-for-Profits may opt for a level of buy-in that involves limited reporting but focuses on 3 to 5 critical elements. This approach would allow smaller organisations to participate and be recognised for their commitment, without facing onerous reporting requirements in terms of time or financial resources.

3. **Differentiating Reporting Standards:** Organisations may have different reporting thresholds according to the obligations or standards to which they are bound. For instance, there are distinct standards for Out-of-Home Care (OOHC), reportable conduct, and the Australian Childhood Foundation. Some standards may be lower but still significant, while others may be at the point of prosecution. It would be beneficial for the framework to provide clear guidelines on how to navigate these different reporting thresholds.

Self-published Annual Report

1. **Setting expectations:** We support an Annual Report requirement for organisations that commit to the framework. However, organisations will need to understand the scope and likely required content. Therefore, we advocate for the provision of clear guidelines on the type of information to be included, such as child safety policies, practices, incidents, and improvements made over the reporting period. This would help organisations prepare comprehensive and meaningful reports that reflect their commitment to child safety.
2. **Document ranking/prioritisation guidance:** Beyond direction about types of information, it would be highly beneficial to guide (particularly smaller) organisations with limited resources to which documents from a suite are essential/critical, important, somewhat important, and so on. This would support efficient deployment of constrained time and resources.
3. **Workload Considerations:** Preparing an annual report can require significant effort for organisations, especially those with limited resources. It is important to provide support, such as templates, training, and resources, to help organisations efficiently compile and present the required information. Additionally, the framework should allow flexibility in reporting formats to accommodate the diverse capacities of different organisations.



4. **Expected Information:** To maximise effectiveness and feasibility, the annual report template could include key elements such as:

- An overview of child safety policies and practices implemented.
- Details of any incidents or concerns reported and how they were addressed, in a manner that accounts for privacy/data protection considerations. Thought should also be given to whether organisations are advised/required to report only substantiated incidents (i.e., allegations found to be true), or substantiated *and* unsubstantiated (i.e., insufficient evidence to find the allegation to be true). If the latter, reporting could be presented in two streams, to create clear delineation.
- Improvements made to enhance child safety.
- Feedback from children, families, and staff on the effectiveness of child safety measures.
- Future plans for further improving child safety.

Resources and Guidance

Child-friendly, rights-based resources: We commend the framework's approach to leveraging existing resources and recognising the need to develop a more rigorous and expansive resource base over the longer term. We are also pleased to see references to child-friendly resources in particular. However, we believe these materials would be significantly improved if they were co-designed by children and young people themselves. Additionally, differentiating the age ranges and developing specific materials to suit different developmental stages would enhance their accessibility and comprehensibility for children. This approach would ensure that children see themselves in the materials, providing a significant benefit to organisations in their child-safe journeys.

Moreover, such resources would be hugely strengthened by the incorporation of a rights-based lens – empowering children and young people with information about their rights and providing clear guidance about how to report any concerns. Meaningfully integrating a rights-based approach ensures that children are not only aware of their rights but also feel confident and supported in exercising them. Additionally, the resource templates should be modifiable to embed local context and representative members of the population, making them much more meaningful for children, young people, and families. There is considerable research demonstrating that resources can have a powerful impact for individuals and communities if they see themselves represented within them.

Sector-specific resources: As we have noted above, different sectors have particular responsibilities, requirements and challenges related to child safety. Sector-specific resources should provide tailored guidance that addresses the specific contexts and practices of each sector, to ensure that all organisations, regardless of focus, can effectively implement the framework and maintain high standards of child safety. While larger organisations will find these resources very useful, it may be necessary to establish a hierarchy of resources with guides for small organisations about which elements are critical for them to embed. This recognises that a management committee overseeing a \$1million Not-for-Profit may not have the capacity to implement all the measures that larger organisations can.

Promotion and Buy-In

Promoting the framework as a mechanism for providing assurance that an organisation is committed to embedding child-safe principles is crucial. We welcome reference to acknowledging past failings and lessons learnt: as we noted above in reference to Parkerville's history and Apology, understanding *how* organisations (of any size, in any sector) can fail to keep children safe is a critical part of the journey to a rigorous, robust and fully integrated child safe environment. There is a huge amount for organisations



within and across sectors to learn from each other – this will foster continuous improvement, but also help to create transparency and accountability.

Concluding reflections

In conclusion, Parkerville Children and Youth Care is committed to the highest standards of child safety and continuous improvement. Our history, rigorous self-assessment, and dedication to embedding child-safe principles across all aspects of our operations demonstrate our unwavering commitment to the well-being of children and young people. We welcome the proposed Child Safety Annual Reporting Framework as a valuable tool for enhancing accountability and transparency. By leveraging existing resources, developing child-friendly and sector-specific materials, and promoting a culture of continuous improvement, we believe the framework will significantly contribute to creating safer environments for all children. We look forward to collaborating with the National Office and other stakeholders to ensure the successful implementation of this important initiative.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Kim Brooklyn".

Kim Brooklyn
Chief Executive Officer

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