



Submission for the Phase 2 reform – Western Australia’s Working with Children legislation

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, and early intervention and prevention 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.
- **Kids' Hub:** multi-disciplinary approach to providing comprehensive mental health/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.
- **Family Support Network:** an early intervention program that connects families with coordinated services to strengthen child safety and prevent entry into out-of-home care.
- **Intensive Family Support Service:** in partnership with Koya Aboriginal Corporation, this service will provide practical, in-home support to families who are engaged with the Department of Communities (Child Protection), where children are either at significant risk of entering out-of-home care or are working towards reunification with their families.
- **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) values the opportunity to contribute to the consultation on WA's Working with Children legislation. 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 promoting accountability and transparency for child safety and wellbeing must be paramount in any legislative response, and we welcome the opportunity to collaborate with the Department and with cross-sector partners to ensure this remains central.

Summary of High-Level Reflections and Recommendations

Child Safety as Core Principle: Child safety and wellbeing must be the paramount consideration in all legislative and organisational responses: beyond compliance to embedding continuous reflection, accountability, and improvement.

Holistic and Contextual Approach: Effective safeguarding requires a holistic, organisation-wide commitment grounded in the realities of complex service environments, recognising that while some roles may not be formally classified as “child-related work,” this does not mean there is no contact with children. In settings like ours, safeguarding obligations must reflect the reality that ancillary roles may have regular or incidental interaction with children, rather than only focus on frontline practice.

Expansive & Tiered Screening Obligations: There is a strong case for Working with Children Checks to apply not only to frontline practitioners, but in particular service environments consideration given to checks for all staff whose roles bring them into contact with children, reflecting the heightened risks in settings such as out-of-home care and specialist services, and for cohorts with age- or developmental-stage vulnerabilities (e.g., infants and toddlers).

Alignment with National Standards & Continuous Improvement: Legislative changes should align with the National Child Safe Principles, National Standards for WWCC, and recommendations of the Royal Commission, ensuring robust, flexible, and context-sensitive safeguards. Ongoing self-assessment, sector learning, and collaboration are essential to drive continuous improvement and maintain high standards of child safety.

Responsibility for Notification: In the case of students on placement, mandatory notification requirements should apply to both the placement provider (employer) and the education provider, ensuring shared responsibility, and alignment with best practice. While dual notification may increase administrative requirements, these can be managed through streamlined, digital processes, with the benefits to child safety outweighing the costs.

Ensuring Timely Access to Information: Timely access to up-to-date information about individuals accused of causing harm to children is an essential line of defence. The current lack of real-time information sharing, both within WA and across jurisdictions, creates unacceptable risks and allows individuals to exploit loopholes. We strongly support reforms that enable the CEO to publish information after the commencement of prosecution (not just after conviction) and to proactively advise organisations serving vulnerable cohorts about a Negative Notice, so that immediate protective action can be taken.

Sector-Specific Guidance: There is a need for clear, practical, and sector-specific resources to support organisations in interpreting and applying new requirements in diverse service contexts.



Parkerville's Child Safe Journey: From Compliance to Embedding Child Safety

At Parkerville, safeguarding children is a holistic, organisation-wide commitment that goes far beyond compliance with Working with Children Checks (WWCC). Our approach is grounded in a culture of continuous reflection, robust child safe practices, and a deep belief that every child's safety and wellbeing must be actively promoted through a comprehensive suite of strategies, policies, and values. Parkerville was the first organisation in Western Australia to achieve Child Safe accreditation with the Australian Childhood Foundation in 2016, and was re-accredited in 2019. We consistently adhere to the highest ethical standards and are in full alignment with Australia's National Child Safe Principles.

Organisational Culture, Processes, and Environment

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.

Organisational maturity in Child Safe culture and practice: integration and embeddedness

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.

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.

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.
- 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.
- 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.

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.



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.

The Parkerville Context: Why Broader Safeguards Are Needed

For environments where children and young people impacted by trauma are regularly present – in Parkerville's case, including accessing support in one of our Centres or sites, or living in one of our residential programs - Principle 5 of the National Child Safe Principles compels us to ensure that every adult, not only frontline practitioners, is both suitable and actively supported to reflect child safety and wellbeing values in practice. Working with Children Checks are a vital mechanism, but in our context, safeguards must extend to all staff whose roles bring them into contact with children, recognising that a truly child-safe organisation is built through a collective commitment to vigilance, accountability, and continuous improvement; where WWCCs work in concert with other organisational practices to foster environments in which children can thrive.

The Nature of Our Environments

At Parkerville's Child, Youth and Family Centres, children and young people impacted by trauma and adversity access support in purpose-designed, trauma-informed spaces that are intentionally welcoming, safe, and empowering. These Centres are dynamic environments where children and families move in and out as part of daily service engagement, and where the physical design, ethos, and operations are all tailored to foster trust, autonomy, and healing. Importantly, the presence of staff extends beyond frontline practitioners to include administration, HR, IT, maintenance, and other corporate functions, all of whom may interact with children or be present in shared spaces as part of business as usual. This same diversity of roles is present at our Parkerville campus at which our Education, Employment and Training program is based, and in our residential settings, such as Our Way Home out-of-home care residences, where children and young people live in radically personalised, shared care environments. For both, Parkerville's ancillary staff, such as IT and - more regularly - maintenance, must sometimes visit to ensure the safety, comfort, and functioning of the properties or homes.

Rationale for Expansive Screening

A staggered, two-tier screening approach should be adopted to ensure that Working with Children Checks are the absolute minimum, while children in particularly vulnerable cohorts (due to age, developmental stage, and/or experience of complex trauma) receive additional safeguarding through enhanced checks beyond predominantly child-facing roles.

In environments where children's vulnerability is heightened and their interaction with adults may be frequent and in different contexts (including incidental interaction in service building spaces like reception areas, lifts, corridors), the logic for requiring Working with Children Checks extends beyond direct client service delivery roles to encompass any staff whose presence or work may bring them into contact with children, even if not on a daily or weekly basis. While this approach inevitably increases the administrative load, it is a proportionate response to the risks inherent in settings where children's safety and wellbeing must be upheld and by all adults, not only those in direct roles.



The National Standards for Working with Children Checks make clear that “the supervised or unsupervised nature of the contact with children is irrelevant to determining whether a person is required to apply for a working with children check.” In settings where children with heightened vulnerabilities due to trauma and adversity are regularly present, we recommend baseline screening for all staff whose roles bring them into a child’s environment, not just those in direct care roles. For those whose roles involve regular or more intensive engagement with children, particularly in high-vulnerability environments such as out-of-home care, heightened checks, training, and supervision should be considered as part of a broader organisational commitment to child safety and wellbeing. This approach recognises both the need for robust, context-sensitive safeguards and the practicalities of organisational operations, supporting the creation of environments where children can thrive without imposing unnecessary barriers to effective service delivery.

By implementing this staggered approach, organisations can balance administrative practicality with the imperative to provide robust protection for children, ensuring that legislative changes are both effective and responsive to the unique risks faced by vulnerable cohorts.

Reflections on the proposed legislative changes

We support the consultation document’s emphasis on providing children with a more consistent level of protection through screening, alongside its emphasis on reflecting contemporary service provision. However, true consistency and contemporaneity must also recognise the realities of organisations whose business as usual is supporting children across multiple settings and contexts, especially those impacted by multiple and complex trauma. In environments like Parkerville, where children and young people may interact with a wide range of adults, the risks and vulnerabilities are heightened and more unpredictable than in settings such as weekly sports programs. National consistency in WWCC is a positive step, but screening must be sufficiently flexible and robust to address the greater complexity and intensity of contact found in organisations like ours.

Alignment with sector Standards

For children in out-of-home care, rigorous Standards such as the National Standards and WA’s Better Care, Better Services Standards require high levels of oversight and protection. In these and other settings in which Parkerville operates, even individuals who have infrequent or indirect contact can influence the relational environment and sense of safety for children who have experienced trauma. This raises the question of whether a more expansive approach to Working with Children Checks is warranted, extending beyond direct care roles to anyone whose work brings them into contact with children in care or receiving supports.

The impact of changes to Working with Children legislation will have particular significance for organisations subject to multiple and sometimes overlapping Standards and accreditation schemes, including those for specialist homelessness and mental health services, where children’s vulnerability and complexity may be heightened. Moreover, organisations may have different thresholds for reporting and compliance depending on the standards to which they are bound; some requiring immediate reporting of any concern, others only at the point of prosecution. It is therefore essential that any approach to screening and compliance is robust and flexible enough to ensure that all children, especially those in complex environments, receive the highest possible level of protection, and that guidance is clear on how to navigate these differing obligations and thresholds.



Building Sector-Specific Guidance and a Culture of Shared Learning for Child Safety

To translate legislative intent into meaningful, context-sensitive practice, sector-specific resources should be developed to provide practical guidance for implementation, to help organisations to interpret and apply new requirements in ways that reflect their unique service contexts.

Additionally, fostering a culture of shared learning across / within sectors will drive continuous improvement, enhance transparency, and strengthen accountability, ensuring that child safety standards are upheld and improved over time.

As the consultation recognises, different sectors face unique responsibilities and challenges in safeguarding children. To ensure that legislative changes to Working with Children Checks are both effective and practical, there is a clear opportunity to develop sector-specific resources that provide tailored guidance for implementation. Such resources would help organisations interpret and apply new requirements in ways that reflect their particular service contexts, whether that is out-of-home care, specialist multi-disciplinary interventions, mental health, or other complex environments. Embedding these changes through targeted guidance and practical tools would support all organisations, regardless of size or focus, to uphold high standards of child safety. This approach would help translate legislative intent into meaningful, context-sensitive practice across the sector.

By equipping organisations with sector-specific resources and fostering a culture of shared learning, we can ensure that legislative changes are not only implemented effectively but also drive ongoing improvement in child safety practices across all service contexts.

Indeed, understanding how organisations of any size and in any sector can fail to keep children safe is a critical part of the journey towards a truly rigorous, robust, and fully integrated child safe environment. There is much for organisations within and across sectors to learn from one another; fostering this culture of shared learning not only drives continuous improvement, but also enhances transparency and accountability.

Students on Placement

To ensure the highest standards of child safety, we strongly recommend that mandatory notification requirements for students on placement be applied to both the placement provider and the education provider. This dual approach not only aligns with national best practice but also provides a critical safeguard against administrative oversight, ensuring that screening agencies are always informed. Streamlined digital processes can mitigate any additional administrative burden, making this a practical and effective reform.

In the case of a student on placement as part of their educational or vocational course of study, notification requirements must be clear, practical, and not create unnecessary administrative burden. Given the complexity of service environments like Parkerville, where students may be placed in settings with heightened child safety risks and multiple layers of oversight, a degree of shared responsibility for mandatory notification by the provider (as the employer) and the student's education provider may be prudent.

- Dual notification by both placement and education providers reduces the risk of administrative error or oversight, ensuring the screening agency is always informed. This redundancy is a critical safeguard in complex environments where multiple parties share responsibility for child safety.
- This approach reflects the reality that both the placement provider (who supervises the student in the workplace) and the education provider (who arranges the placement and retains duty of care) have obligations for child safety. It reinforces a culture of collective vigilance and accountability.
- Requiring both parties to notify may increase paperwork and compliance costs, especially for large institutions or frequent placements. However, this can be mitigated by streamlined, digital notification processes and clear protocols; with the risk of duplicate notifications managed through robust IT systems and clear delineation of roles and responsibilities.

If only one party is to be required, the education provider is preferable, as they hold the overarching duty of care and are responsible for the student's placement arrangements. However, best practice would be for both parties to notify.

Ensuring Timely Access to Information About Individuals Who Pose a Risk to Children

For organisations like ours, which serve highly vulnerable children and young people, timely access to the most up-to-date information about individuals accused of causing harm is an essential line of defence in safeguarding children. The current system, where jurisdictions do not effectively share information and individuals can exploit loopholes by moving between states or roles, is not working well enough. This creates unacceptable risks and undermines the effectiveness of Working with Children Checks, exposing children to preventable harm.

We strongly support reforms that would:

Allow the CEO to publish information about a prosecution after the commencement of proceedings, not just after conviction.

And

Empower the CEO to proactively advise relevant organisations and/or publish a public warning notice if a person with a current Negative Notice continues to carry out child-related work before prosecution has commenced.

Waiting until conviction can take months or years, during which time children may remain at risk. Publishing information at the point of prosecution commencement (with appropriate safeguards for privacy and fairness) would enable organisations to take immediate protective action, consistent with the principle that child safety must be paramount.

Similarly, delays in notification, whether due to administrative processes or the time taken to commence prosecution, can leave children exposed to harm. Proactive notification empowers organisations to act swiftly to protect children, close loopholes, and uphold the highest standards of child safety.

These reforms are necessary to address significant weaknesses in the current system, where information siloes and lack of cross-jurisdictional communication can be exploited by individuals. We urge that these changes be implemented alongside improvements in national consistency and information sharing between jurisdictions, as recommended by the Royal Commission and reflected in the National Standards. Only through a coordinated, transparent, and proactive approach can we ensure that all children, especially those most vulnerable, are afforded the protection that is their right.



Concluding reflections

Parkerville Children and Youth Care is committed to the highest standards of child safety and ongoing 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 wellbeing of children and young people. We welcome the proposed legislative changes as an opportunity to further strengthen accountability and transparency across the sector.

Understanding how organisations of any size and in any sector can fail to keep children safe is a critical part of the journey towards a truly rigorous, robust, and fully integrated child safe environment. There is much for organisations within and across sectors to learn from one another; fostering this culture of shared learning not only drives continuous improvement, but also enhances transparency and accountability.

By leveraging existing resources, developing child-friendly and sector-specific materials, and promoting a culture of continuous improvement and shared learning, we believe these reforms can significantly contribute to creating safer environments for all children. We look forward to collaborating with the Department of Communities and other stakeholders to ensure these important changes are implemented effectively and meaningfully.

Yours sincerely,

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

Kim Brooklyn
Chief Executive Officer

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Contact details

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