

# Child Safe Action Plans

A Guide for prescribed  
NSW Government Agencies



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# Glossary

**Child Safe Action Plan (CSAP)** – a plan that contains the strategies a prescribed agency will take, both in the services it provides and with related bodies, to build awareness about the importance of child safety, build the capability of child safe organisations to implement the Child Safe Standards, and improve the safety of children.

**Prescribed agency** – an identified NSW government agency that is required to develop a CSAP, including the Department of Communities and Justice, the Office of Sport within the Department of Communities and Justice, the Department of Education, the NSW Education Standards Authority, the Ministry of Health, the Department of Planning, Industry and Environment (limited to functions undertaken by the Office of Local Government), the Inspector of Custodial Services, and any other agency prescribed by regulation.

**Related body** – a child safe organisation that a prescribed agency funds or regulates.

**Child safe organisation** – an organisation that is either:

- An entity mentioned in Schedule 1 of the *Children’s Guardian Act 2019* (except out-of-home care and adoption service providers)
- A religious body that provides services to children or in which adults have contact with children
- A local government authority
- A club or other body providing recreational or sporting programs or services to children and in which workers are required to hold a Working With Children Check clearance.



# Introduction

The Office of the Children’s Guardian (OCG) has a clear vision for organisations working with children in NSW – to influence and lead change by building capability in organisations to be child safe.

We seek to drive significant change across NSW through our role as a regulator. This includes collaborating and cultivating relationships with child related organisations, NSW Government agencies, peak bodies, and the community.

The OCG is leading the implementation of the Child Safe Scheme across child-related organisations in NSW as provided by the *Children’s Guardian Act 2019* (CG Act). The objective of the scheme is to assist in preventing the abuse of children and young people in organisations and improve responses if it does occur. It aims to drive cultural change by raising awareness, building capability, and holding organisations to account for their implementation of the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission).

Some NSW Government agencies – called a prescribed agency – will play a strategic role in promoting the interests and rights of children and influencing sector wide reform to embed child safety across their services to children, and child safe organisations they fund or regulate. This is through the development and implementation of Child Safe Action Plans (CSAPs), as required by Division 3 of the CG Act. CSAPs are strategic plans that clearly articulate how prescribed agencies will influence change across sectors, noting their authority as sector leaders.



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**Only prescribed NSW Government agencies are required to prepare a CSAP. These are the:**

- **Department of Communities and Justice**
- **Ministry of Health**
- **Department of Education**
- **Office of Sport**
- **Office of Local Government**
- **Inspector of Custodial Services**
- **NSW Education Standards Authority.**

The *Guide to Child Safe Action Plans* provides an overview of the Child Safe Scheme and the role of CSAPs. Specifically, it provides:

- information about the Child Safe Standards, child safe organisations and the legislative context
- information about the process prescribed agencies may follow to develop, publish, and review CSAPs
- templates to assist prescribed agencies develop their CSAP, including suggested objectives, actions, and outcomes
- guidance on how prescribed agencies can evaluate implementation of their plan and report on progress.

The OCG recognises the diversity of sectors and the organisations within them. For this reason, the guidance we provide is not prescriptive and allows prescribed agencies to develop and implement CSAPs that are relevant and effective for their specific context. CSAPs will help agencies identify gaps, agree to priorities, streamline processes, and drive cultural change to keep children safe.

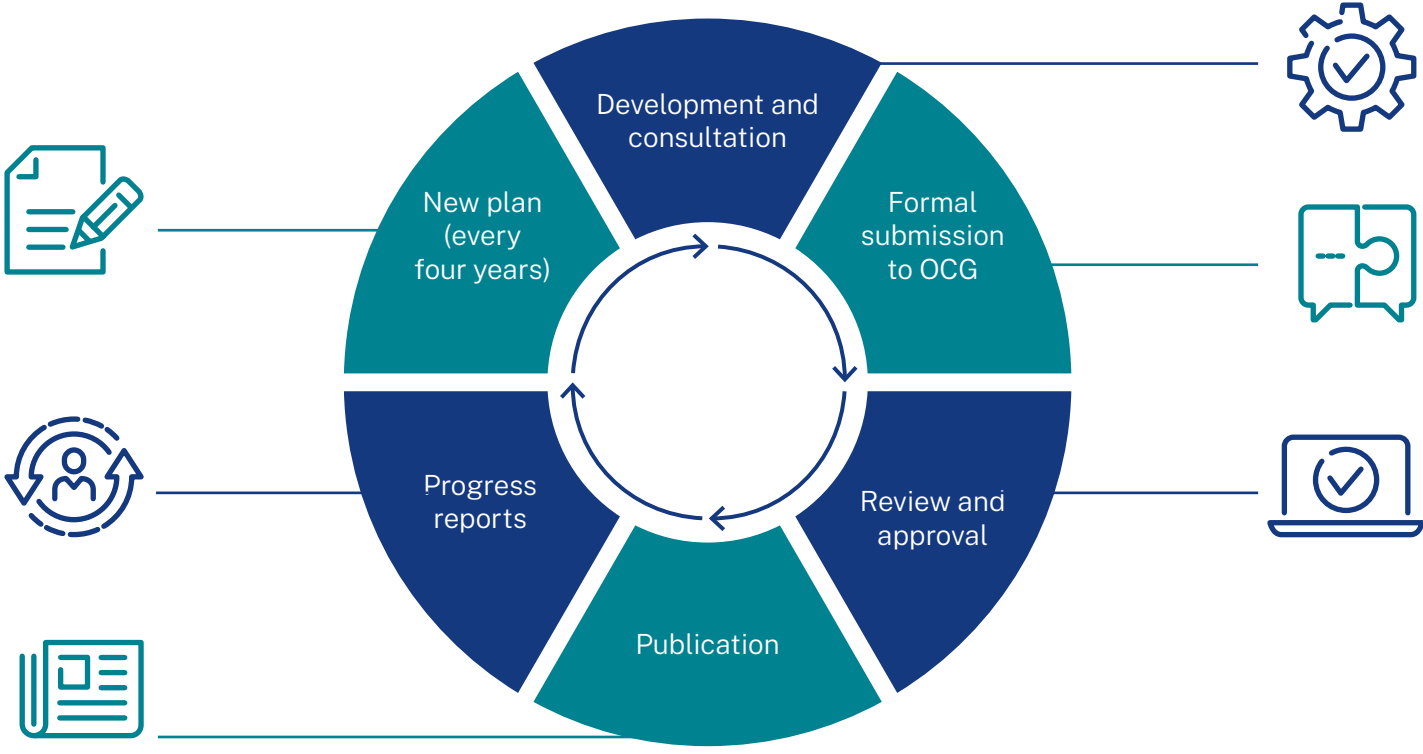
#### **Contact**

If you have any questions or would like further information to support the development of your agency's CSAP, please contact [PolicyTeam@ocg.nsw.gov.au](mailto:PolicyTeam@ocg.nsw.gov.au).

#### **Other resources**

The OCG has developed a range of resources and supports to help organisations implement the Child Safe Standards. These include a Guide to the Child Safe Standards, a Child Safe Code of Conduct and template, and an Empowerment and Participation Guide. The OCG is also developing a self-assessment tool for organisations to assess how they are going against the Child Safe Standards and how they can implement child safe practice. Prescribed agencies are encouraged to distribute these resources and supports throughout their networks.

# Process and timeline – Summary



Please note: Section 81 of the CG Act provides that prescribed agencies must develop and implement a CSAP within 12 months of becoming a prescribed agency, or a longer period approved in writing by the Children’s Guardian.

# 1 Child Safe Organisations

## Legislative context

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### Children's Guardian Act 2019

The main object of the CG Act is to protect children by providing specific oversight roles and functions to the OCG. This includes promoting the quality of organisations and persons providing services to children and regulating those organisations and persons in providing those services.

Part 3A of the CG Act establishes a legislative Child Safe Scheme. This scheme:

- requires child safe organisations to take action to prevent and better respond to child abuse in organisations by implementing the Child Safe Standards through their systems, policies, and processes
- strengthens oversight of certain child-related organisations to hold them to account for their implementation of the Child Safe Standards
- requires significant public sector agencies (called prescribed agencies) to develop and implement Child Safe Action Plans to promote sector wide reform.

### Child Safe Standards

The Child Safe Standards, recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, provide a best practice, evidence-based framework to create child safe organisations.<sup>1</sup> They are about improving organisational cultures, operations, and environments to prevent child abuse –including sexual, physical, emotional abuse, and ill-treatment and neglect –and make sure it is responded to appropriately if it does occur.

The Child Safe Standards are designed to drive cultural change in organisations so that they can create, maintain, and improve their child safe practices. By implementing the Standards, organisations will build a culture where abuse of children is prevented, responded to, and reported.

The Standards are principle-based and focused on outcomes, not prescriptive compliance. This means organisations will have flexibility to implement them in ways that are meaningful and achievable in their context. An overview of the Child Safe Standards is at **Appendix A**.

### Identifying specific risks to child safety

Risk factors are the individual characteristics, environmental circumstances and other factors that increase the probability of child abuse occurring when present. The likelihood of harm increases when more risk factors are present. Risks may be identified through different strategies, including through organisational risk analysis of child cohorts, the nature of service delivery, the composition of the workforce, or the culture of an organisation. The OCG is developing a self-assessment tool to assist in the risk identification process.

Protective factors are the opposite of risk factors. Their presence can reduce the likelihood of harm and improve child safety and wellbeing. Children are exposed to higher levels of risk when organisations take no action to implement protective strategies. The Child Safe Standards provide a framework for organisations to reduce organisational risk by implementing protective strategies. Organisations can use the Child Safe Standards to identify protective strategies to respond to specific risks to child safety.

### Continuous improvement

Child safe cultures develop over time, and need consistent and intentional focus, effort, and action by leaders, employees, and volunteers. The OCG recognises this is an ongoing approach to improving service standards, developing skills, and changing organisational culture. The development and implementation of CSAPs requires sustained action over time, not immediate leaps in practice.

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1. Section 8C CG Act.

# 2 Child Safe Action Plans

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## **Certain NSW Government agencies are required to develop a CSAP**

Organisations that are required to prepare a CSAP are called a prescribed agency.<sup>2</sup> These are the:

- Department of Communities and Justice
- Ministry of Health
- Department of Education
- Office of Sport
- Office of Local Government
- Inspector of Custodial Services
- NSW Education Standards Authority.

These agencies are expected to take a leading role in influencing their sectors to create cultures, adopt strategies and act to prevent harm to children.

Prescribed NSW Government agencies have been identified because either:

- their functions require that they exercise a high degree of responsibility for children and/or engage in activities that involve a heightened risk of child abuse, due to the nature of the activities involving children, or the additional vulnerability of the children they engage with, and/or
- they have significant scope to champion and influence change across their sector.

Related bodies, being the child safe organisations the prescribed agency funds or regulates, such as early education providers, schools, or sporting organisations, are not required to develop CSAPs as part of their implementation of the Child Safe Standards.

## **Legislative requirement to develop a CSAP**

A CSAP is a plan that contains the strategies a prescribed agency will take, both in the services it provides and with related bodies to:<sup>3</sup>

- build awareness in the community about the importance of child safety in child safe organisations, and
- build the capability of child safe organisations to implement the Child Safe Standards, and
- improve the safety of children by implementing the Child Safe Standards.

CSAPs aim to promote sector-wide leadership across government. They set an expectation that NSW Government agencies will:

- be change agents within their sectors by championing the Child Safe Standards to drive sector wide change
- use their influence to ensure that the Child Safe Standards are embedded across government and are integral to the way services are delivered to children.

The table on the following page provides more information about the three strategies in a CSAP.

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2. Section 8G CG Act.

3. Section 8F CG Act.





### **Build awareness in the community about the importance of child safety in child safe organisations**

This strategy aims to shift community expectations by engaging the support of families with children, and the broader community, in NSW through, for example strategic partnerships, stakeholder information campaigns, stakeholder engagement activities, and resources for parents and carers.



### **Build the capability of child safe organisations to implement the Child Safe Standards**

This strategy will focus on providing general and sector-specific support to build capability in organisations to implement the Child Safe Standards. OCG resources and supports are available on the [OCG website](#).



### **Improve the safety of children by implementing the Child Safe Standards.**

This strategy aims to encourage prescribed agencies to take a role in implementing the Child Safe Standards in their services and/or with related bodies to reduce the risk of child abuse and poor responses.

How prescribed agencies implement the Child Safe Standards will depend on their functions and the extent of their services and roles in relation to children. This will mean prescribed agencies will have either an indirect role in facilitating the implementation of the Child Safe Standards in related bodies or a direct role in implementing the Child Safe Standards in their own child-related services.



**Skills, knowledge and expertise**



**Safer organisations for children and young people**



**Increased awareness about child safety in organisations**



# 3 Development, publication, and review



## Requirements for development, publication and review

Part 3A (Division 3) of the CG Act sets out the steps that prescribed agencies are required to undertake to develop and complete CSAPs. Prescribed agencies must develop and implement a CSAP within 12 months of becoming a prescribed agency, or longer if approved by the OCG.<sup>4</sup>

The following table outlines the requirements for the development, publication and review of a CSAP as outlined in the CG Act.

The Children's Guardian may give written approval for an agency to develop and implement an additional plan for a specified area of operations, where the additional plan addresses only the part of the agency's operations specified in the approval. This means an agency may develop a separate plan for a specific part of their child related operations if approved by the Children's Guardian. For example, the Quality Assurance and Regulatory Services Directorate, which regulates the early education sector, may develop their own plan separate from the Department of Education.

4. Section 8I CG Act.

Requirements	Explanation
<input type="checkbox"/> Consultation <sup>5</sup>	<p>Prescribed agencies must develop CSAPs in consultation with the OCG, related bodies, or any other entity or individual who in the agency's opinion, are likely to be directly affected by the plan.</p> <p>If the agency or related body provides services to Aboriginal children, consultation should include consultation with one or more Aboriginal Controlled Organisations.<sup>6</sup> This consultation must be undertaken before the final plan is submitted to the OCG. Agencies may make decisions about how they will consult with their stakeholders with related bodies, entities, or individuals for example through targeted or general consultation methods.</p>
<input type="checkbox"/> Formal submission <sup>7</sup>	<p>A prescribed agency must submit its CSAP to the Children's Guardian for review and approval.</p>
<input type="checkbox"/> Review <sup>8</sup>	<p>The OCG may provide feedback directly to the prescribed agency on the CSAP, which may include feedback from the Advocate for Children and Young People.</p> <p>The OCG may choose to also report publicly on the agency's plan and implementation, such as commenting on the effectiveness of its implementation.</p>
<input type="checkbox"/> Publication <sup>9</sup>	<p>The final CSAP must be published on the website of the prescribed agency. The OCG may provide a link to an agency's Child Safe Action Plan on their website.</p>
<input type="checkbox"/> Progress reports <sup>10</sup>	<p>If required to do so by written notice from the Children's Guardian, a prescribed agency must provide a progress report on the agency's implementation of its CSAP. An agency's report is to include information that demonstrates how the agency is working with related bodies to:</p> <ul style="list-style-type: none"> <li>• build awareness in the community about the importance of child safety in child safe organisations, and</li> <li>• build the capability of related bodies to implement the Child Safe Standards, and</li> <li>• improve the safety of children by implementing the Child Safe Standards by related bodies (that is, that related bodies are taking steps to implement the Child Safe Standards within their organisation).</li> </ul> <p>A prescribed agency must provide its report to the Children's Guardian within 90 days of receiving the written notice, or a longer period approved in writing by the Children's Guardian.</p>
<input type="checkbox"/> Reporting by the agency <sup>11</sup>	<p>The prescribed agency is required to, on an annual basis, report in its Annual Report on progress of the CSAP implementation. This must include:</p> <ul style="list-style-type: none"> <li>• a link to the agency's CSAP</li> <li>• the agency's assessment of the effectiveness of the plan in promoting and supporting the adoption and implementation of the Child Safe Standards by related bodies.</li> </ul> <p>More information on what type of information the OCG will seek through reporting processes is below.</p>
<input type="checkbox"/> New plan <sup>12</sup>	<p>The prescribed agency is required to develop a new plan every 4 years, with the above process to be followed.</p>

5. Section 8J CG Act.

6. Section 8J(c). This section has not commenced. It will require prescribed agencies to consult with one or more Aboriginal Controlled Organisations prescribed by Regulation, where an agency or related body provides services to Aboriginal children. The OCG will advise stakeholders when Aboriginal controlled entities are prescribed in the regulations for the purposes of this section. However, as a matter of best practice, consultation with Aboriginal entities by prescribed agencies in the development of the CSAP is strongly encouraged.

7. Section 8K CG Act.

8. Section 8K(2)(b) CG Act.

9. Section 8L CG Act.

10. Section 8M CG Act.

11. Section 8N CG Act.

12. Section 8O CG Act.

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## **Flexibility in implementation**

As prescribed agencies have diverse roles and responsibilities, CSAPs should be designed to best support the different needs of each prescribed agency. As such, in developing a CSAP, the prescribed agency will need to consider the needs of their sector and their role within that sector.

Prescribed agencies have varying scope and influence in their sectors, and the roles and responsibilities they each have in relation to children and young people differs. For example, some prescribed agencies deliver services directly to children while others regulate or fund other bodies who deliver services to children. Agencies will need to determine what they can reasonably achieve in the context of their role and functions.

CSAPs provide flexibility so agencies can identify opportunities within existing resources and frameworks to promote and support child safety. Expectations around what agencies should include in their plans will be commensurate with what they are reasonably able to achieve within their financial and resource capacity, and the expectations of their stakeholders. Agencies can also consider how they can align reporting and monitoring requirements with existing systems and frameworks to minimise duplicative or onerous reporting or data collection.

Agencies should also consider other contextual factors which may be relevant to their sector or child related operations. This can include the specific needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disability, and/or children who identify as LGBTQIA+.

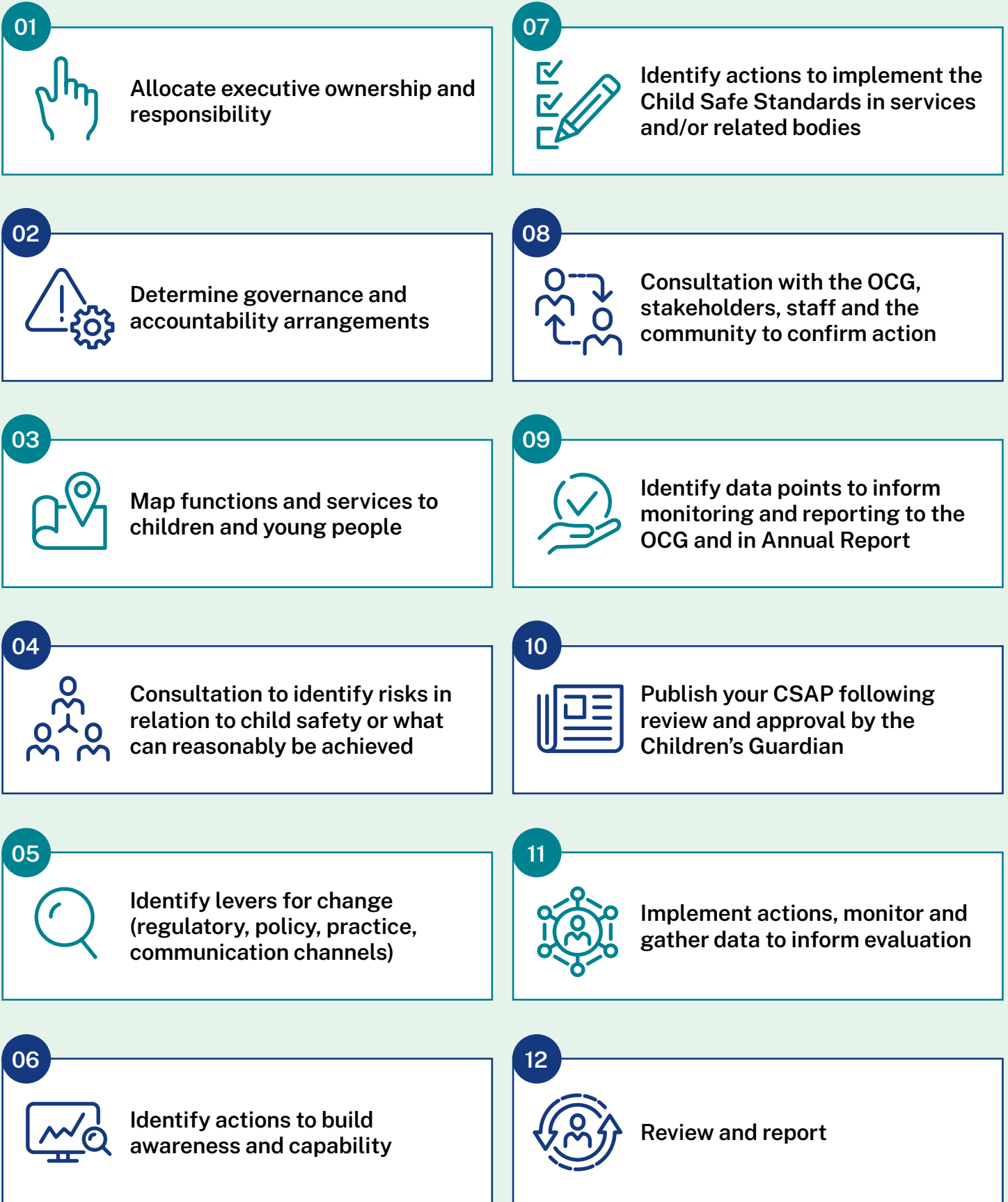
## **Information sharing – OCG and prescribed agencies**

Reciprocal information exchange is available to the OCG and prescribed agencies through section 180 of the CG Act. This section provides that the Children's Guardian may, for the purpose of exercising the functions of the Children's Guardian:

- give a relevant body information relating to the safety, welfare and wellbeing of a particular child or class of children
- direct a prescribed agency to give the Children's Guardian information relating to the safety, welfare and wellbeing of a particular child or class of children.







## Suggested steps to develop a CSAP


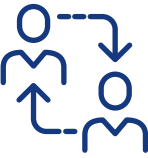




The below flow chart provides an overview of the suggested steps prescribed agencies can take to develop their CSAP. Reflective questions on key steps are also provided to promote reflection on what may be required as part of the process.



## Reflective questions

This table contains guide reflective questions which can be used by prescribed agencies when developing their CSAP. The questions in this list have been arranged to align with the suggested steps in the above flow chart. Prescribed agencies are encouraged to use these questions to reflect on how CSAPs can be best developed according to their needs and contexts.

Step	Reflective questions
 01 <b>Allocate Executive ownership and responsibility</b>	<p>Who is the Executive Sponsor for the CSAP? Who is the lead officer or project manager?</p> <p>Do you need to establish a CSAP working group to support the development of the plan?</p>
 02 <b>Determine governance and accountability arrangements</b>	<p>Have you established adequate governance arrangements for the development of the CSAP? Does there need to be a steering group?</p> <p>Does the internal working group have adequate representation from policy, operational, and frontline staff?</p>
 03 <b>Mapping functions and services to children and young people</b>	<p>Do you have a clear picture of the services to children your agency provides, regulates, or funds?</p> <p>What is the extent of children's involvement with those services?</p>
 04 <b>Consultation to identify risks in relation to child safety or what can reasonably be achieved</b>	<p>Do you need to undertake consultation or research (e.g. surveys or preliminary discussions) to identify key safety challenges or risks to child safety?</p> <p>What are some of the safety challenges or risks to child safety that may arise in the provision of services to children? Is specific action needed for some specific risks?</p> <p>How will you engage stakeholders to identify safety challenges?</p>
 05 <b>Identify levers for change (regulatory, policy, practice, communication channels)</b>	<p>What levers for change are available for your agency to influence change?</p> <p>What is the extent of the ability of your agency to influence change in services your agency provides, funds, or regulates?</p> <p>What is the nature of the workforce(s) (e.g. professional or volunteer) in the services your agency provides, funds, or regulates?</p> <p>What agreements does your agency have with related bodies, and how can it influence change through those agreements (for example in contracts, grants, or procurement)?</p>
 06 <b>Identify actions to build awareness and capability</b>	<p>What action(s) can you take to build awareness and capability for services to be safer for children? Is this in a direct or indirect role?</p> <p>Will you need to link in with other supports or frameworks already available?</p> <p>What specific action(s) are needed to address specific risks to child safety in child safe organisations?</p>

Step	Reflective questions
<p>07  <b>Identify actions to implement the Child Safe Standards in services and/or related bodies</b></p>	<p>Do you have a direct role in delivering services to children or do you fund or regulate child safe organisations? What does this mean for how you will need to approach the implementation of the Child Safe Standards?</p>
<p>08  <b>Consultation with the OCG, stakeholders, staff, and the community to confirm action</b></p>	<p>What stakeholders will need to be consulted on the development of your CSAP? Is there an opportunity to include the voices of children and young people? What are the most appropriate consultation methods? For example, small group discussions, interviews, surveys, submissions, etc. Are you providing stakeholders the opportunity to provide feedback on your identified safety challenges, risks, and proposed actions? How will you address and incorporate stakeholders' feedback and communicate the outcomes of your consultation?</p>
<p>09  <b>Identify data points to inform monitoring and reporting to the OCG and in Annual Report</b></p>	<p>How will you measure success? How will you monitor implementation of your CSAP? Have you identified data points that you can collect to inform the effectiveness and impact of your CSAP? Are there existing data or data collection methods in use in your agency that can be utilised to inform monitoring and reporting on your CSAP?</p>
<p>10  <b>Publish your CSAP following review and approval by the Children's Guardian</b></p>	<p>Where will you publish your CSAP? How will you notify related bodies that a CSAP has been published?</p>
<p>11  <b>Implement actions, monitor and gather data to inform evaluation</b></p>	<p>Have unexpected risks or challenges arisen while implementing your CSAP? Have new data points arisen that may be useful while implementing your CSAP? Do you have systems in place to record data and share with the OCG if requested?</p>
<p>12  <b>Review and report</b></p>	<p>Have you identified responsible persons for action? Have you distributed plans to stakeholders?</p>

# 4 Objectives, example actions, and outcomes

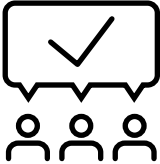




Prescribed agencies will need to determine what actions they can take to meet their legislative requirements to build awareness, capability, and embed the Child Safe Standards. Actions under these pillars will have different outcomes, which are outlined in the below table. Example actions are also outlined below. The suggested outcomes and actions listed here are provided as guides to help inform the development of CSAPs and thinking about what actions prescribed agencies may take and what outcomes they may aim to achieve.

These lists are not prescriptive nor exhaustive. Outcomes can also be used to develop a monitoring plan, and related data points to inform progress. Additional detail on monitoring and evaluation, including suggested data points, is provided below.




## Objectives and outcomes

Strategy	Objective	Suggested short-term outcomes	Suggested longer-term outcomes	Ultimate outcomes <sup>13</sup>
<b>Awareness raising</b> 	Child safe organisations and the community are aware of the Child Safe Standards	<ul style="list-style-type: none"> <li>Increased awareness of the Child Safe Standards and legislative requirements</li> <li>Increased organisational awareness of legislative requirements, including reporting obligations</li> <li>Increased level of sector engagement with the Child Safe Standards</li> <li>Increased level of parent and community awareness engagement on child safety</li> </ul>	<ul style="list-style-type: none"> <li>A well-informed NSW community, knowledgeable about child rights, child safe practice and preventing and responding to abuse in organisations</li> <li>Parents and carers are aware of the Child Safe Standards, child safe practices, and the role of the OCG and prescribed agencies</li> <li>Sectors advocate for improved child safe practice</li> <li>Children and young people involved in child-related organisations know their rights</li> </ul>	<p><b>NSW children and young people are safe in the organisations that they learn, play, and live in</b></p> <p><b>Reduction in child abuse in organisational settings</b></p> <p><b>Improved responses and reporting of child abuse</b></p>
<b>Capability building</b> 	Child safe organisations build their capability to implement the Child Safe Standards	<ul style="list-style-type: none"> <li>Organisations know how to recognise factors in their culture, operations and environments that increase risks to child safety</li> <li>Leaders, staff, and volunteers know how to respond to allegations of abuse and report as required</li> <li>Organisations engage in capability building and support activities offered by the OCG or other providers</li> </ul>	<ul style="list-style-type: none"> <li>Leaders and staff of child related organisations have increased confidence and willingness to act to prevent and respond to abuse</li> <li>A culture of continuous improvement in child safe practice is embedded in organisations</li> </ul>	
<b>Implementing the Child Safe Standards</b> 	Child safe organisations implement the Child Safe Standards	<ul style="list-style-type: none"> <li>Child safe organisations implement the Child Safe Standards in meaningful and achievable ways</li> <li>Actions of leaders and the attitudes and behaviours of staff support a culture where child abuse is prevented and responded to</li> <li>Child safe organisations have protective strategies in place to respond to specific risks to child safety that arise in the context of their services to children</li> </ul>	<ul style="list-style-type: none"> <li>The best interests of children and their protection from harm is paramount</li> <li>Reporting of abuse is never obstructed or prevented</li> <li>Children's rights are understood and respected</li> <li>Concerns about child safety raised by children and their parents and carers are acted on</li> </ul>	

13. These outcomes are related to the implementation of the Child Safe Standards across NSW. Prescribed agencies are not responsible for achieving these outcomes, but successful implementation of CSAPs will help contribute towards these ultimate outcomes.

## Example actions

	Strategy	Example actions
	<p><b>Build awareness in the community about the importance of child safety in child safe organisations</b></p>	<ul style="list-style-type: none"> <li>• Developing sector specific child safe organisation websites to provide information about how to protect children.</li> <li>• Promoting and disseminating information about the Child Safe Standards in existing website and communication channels.</li> <li>• Translating communication materials into formats that are accessible to diverse communities.</li> <li>• Distributing child safe tools and resources to organisations through government agencies and their existing relationships with organisations.</li> <li>• Promoting the Child Safe Standards and the importance of child safe cultures, environments and events at conferences or other events.</li> <li>• Distributing or undertaking surveys developed by the OCG to gauge staff awareness and understanding of the Child Safe Standards.</li> <li>• Conducting child rights training with sector staff and volunteers.</li> </ul>
	<p><b>Build the capability of child safe organisations to implement the Child Safe Standards</b></p>	<ul style="list-style-type: none"> <li>• Referring staff and volunteers in services and/or related bodies to OCG training and supports.</li> <li>• Providing training and other resources to staff and volunteers in services and/or related bodies.</li> <li>• Developing sector specific training and supports (if not available).</li> <li>• Encouraging staff and volunteers in services and/or related bodies to undertake self-assessment against the Child Safe Standards.</li> </ul>
	<p><b>Improve the safety of children by implementing the Child Safe Standards</b></p>	<ul style="list-style-type: none"> <li>• Reviewing relevant policies and procedures through a child safe lens as part of usual review processes.</li> <li>• Implementing the Child Safe Standards in child-related services – see the Guide to the Child Safe Standards.</li> <li>• Developing a Commitment to Child Safety, Child Safe Policy, Compliant Handling Procedure, Code of Conduct, Risk Management Plan.</li> <li>• Embedding the Child Safe Standards in organisational policy and practice to influence change.</li> <li>• Sharing information with the OCG where there are significant concerns about child safety in services and/or related bodies.</li> <li>• Incorporating the Child Safe Standards in systemic reviews about services and/or related bodies when relevant to child safety.</li> <li>• Embedding the Child Safe Standards in regulatory systems or processes.</li> <li>• Including a requirement that child-related organisations implement the Child Safe Standards in contract arrangements (see draft clause at Appendix B).</li> <li>• Monitoring and evaluating the implementation of the Child Safe Standards in services and/or related bodies.</li> <li>• Advising the OCG where there are significant concerns about child safety in services and/or related bodies.</li> <li>• Incorporating the Child Safe Standards in systemic reviews about services and/or related bodies when relevant to child safety.</li> </ul>

# 5 Evaluation and reporting

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## Reporting

Prescribed agencies are required to report in their Annual Report on progress of CSAP implementation. This must include the agency's assessment of the effectiveness of the plan in promoting and supporting the adoption and implementation of the Child Safe Standards by related bodies.

Additionally, if required to do so by written notice from the Children's Guardian, a prescribed agency must provide a progress report on the agency's implementation of its CSAP. An agency's report is to include information that demonstrates how the agency is working with related bodies to implement the CSAP, and the OCG may ask for specified information as part of these requests.

The purpose of reporting (both in Annual Reports and in progress reports) is to both help assess the effectiveness and impact of the implementation of a CSAP, and to inform the implementation of the new Child Safe Scheme. This information can be used to, for example:

- inform strategic and practice improvements
- quantify the reach and collective impact of the Child Safe Scheme, including cultural change
- identify improvements to practice, awareness and engagement with matters relating to child safety
- contribute to the evidence base for what makes organisations safer for children.

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## Data

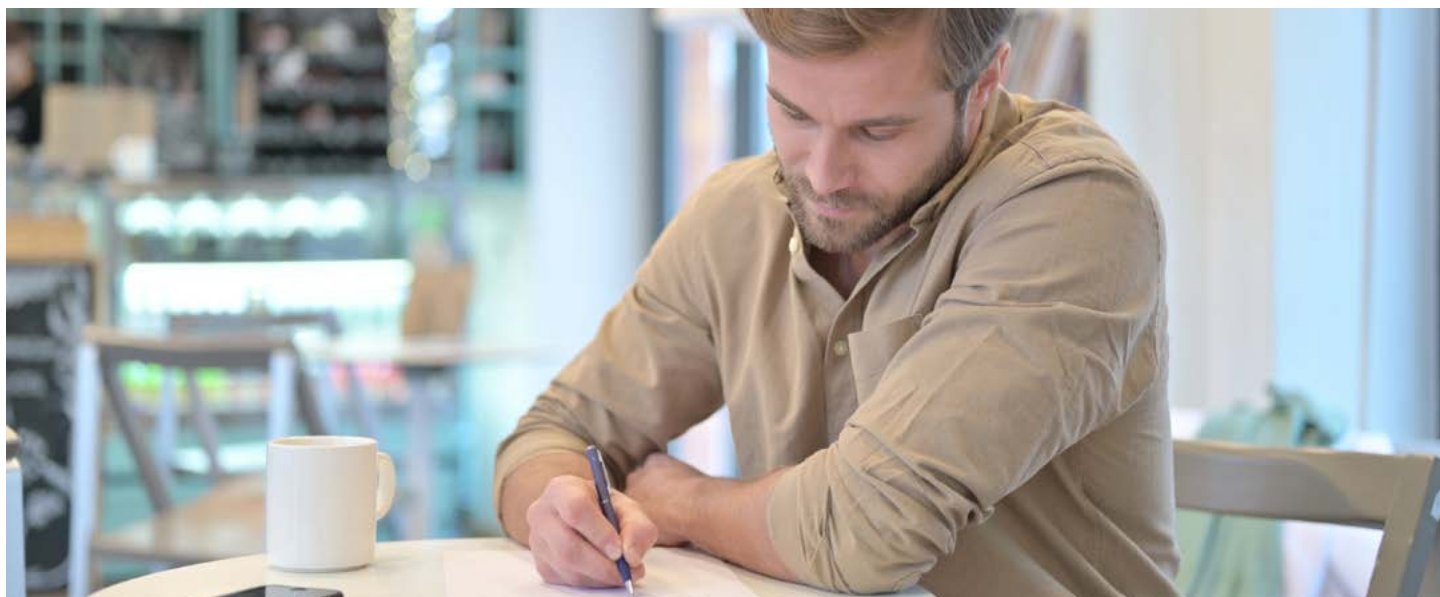
The kinds of data and information that will be relevant to include in a prescribed agency's Annual Report or that may be requested by the OCG will differ depending on the scope and content (including Actions) of each CSAP. In developing processes to collect and analyse data for these purposes, the OCG encourages prescribed agencies to consider where existing data collection systems and mechanisms can be utilised, to avoid duplicative data collection and analysis.

The OCG, in its review of agencies' CSAPs, may suggest specific data that could be collected to inform broader evaluation of the Child Safe Scheme.

Listed here are some suggested data points that may be useful to collect as part of a prescribed agency's reporting requirements. This is not a prescriptive nor exhaustive list but includes examples of data that agencies can use to assess the performance of their CSAP and to implement improvements over time.

- The number of related bodies required to implement to Child Safe Standards.
  - If the agency develops their own training sessions (or facilitates training through a third-party provider) about the implementation of Child Safe Standards:
    - Number of training sessions delivered/attended
    - Number of participants in training sessions
    - Number of unique organisations (including the prescribed agency and related bodies) represented at training sessions.
  - The number of enquiries an agency receives about the implementation of the Child Safe Standards.
  - The number of visits to webpage(s) related to the implementation of the Child Safe Standards and/or engagement on social media channels.
- Other sources of information beyond quantitative data that may be useful for prescribed agencies to collect are listed here. Some of this information may come from related bodies, and it may be difficult for prescribed agencies to collect this information. This list is not prescriptive nor exhaustive, and the OCG encourages prescribed agencies to think about different ways it can gather information as part of its reporting requirements.
- Data or comments on general awareness of the Child Safe Standards amongst staff in the prescribed agency.
  - Data or comments on general awareness of the Child Safe Standards in related bodies, including in staff or in the children and parents/carers who use the services of the related bodies.
  - Data on new policies/procedures introduced relating to the implementation of the Child Safe Standards.
  - Data on or examples of organisations within a sector that indicate increased engagement of children and young people in organisational decision making.
  - Comments on whether organisations within a sector are proactively implementing elements of a CSAP or whether they must be prompted to do so.
  - Comments on key challenges/barriers in implementing the Child Safe Standards by a prescribed agency or related bodies, and any examples of how these challenges may have been overcome.
  - Data on the number of reports or enquiries made under the Reportable Conduct Scheme, either from within the prescribed agency or from related bodies where practicable.
  - Data on children/families raising concerns or allegations.

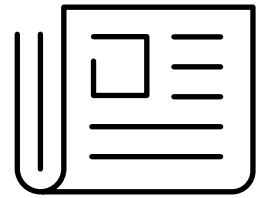
# 6 Child Safe Action Plan – Example template



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This section contains a sample template which can be used by prescribed agencies when developing their CSAP. This template can be amended to suit the needs and context of each prescribed agency.

# Child Safe Action Plan



## Overview (for agencies to complete)

Name of prescribed agency

Nature of services or functions

Key risks in relation to child safety

Key levers for change

Executive Sponsor

Date endorsed

Version

## Roles and responsibilities – OCG and prescribed agencies

### Office of the Children's Guardian

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

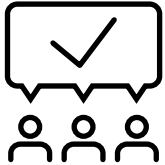
- Provide guidance to prescribed agencies in developing Child Safe Action Plans through consultation and review of plans.
- Provide generic and sector-specific support to build capability in organisations to implement the Child Safe Standards.
- Engage with key stakeholders, including children and the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




### Prescribed agency


*Prescribed agency to identify its strategic role in relation to the Child Safe Standards as it relates to the nature of their services and/or functions*

Objectives and outcomes

Step	Objective	Actions	Completion date	Owner	Desired outcomes	Data points	Ultimate outcomes
<p>Awareness raising</p> 	<p>Child safe organisations and the community are aware of the Child Safe Standards</p>						<p>NSW children and young people are safe in the organisations that they learn, play, and live in</p> <p>Reduction in child abuse in organisational settings</p> <p>Improved responses and reporting of child abuse</p>

Step	Objective	Actions	Completion date	Owner	Desired outcomes	Data points	Ultimate outcomes
<p>Capability building</p> 	<p>Child safe organisations build their capability to implement the Child Safe Standards</p>						<p>NSW children and young people are safe in the organisations that they learn, play, and live in</p> <p>Reduction in child abuse in organisational settings</p> <p>Improved responses and reporting of child abuse</p>



Step	Objective	Actions	Completion date	Owner	Desired outcomes	Data points	Ultimate outcomes
<p data-bbox="107 188 293 280"><b>Implementing the Child Safe Standards</b></p> 	<p data-bbox="405 188 584 344">Child safe organisations implement the Child Safe Standards</p>						<p data-bbox="1890 528 2141 719"><b>NSW children and young people are safe in the organisations that they learn, play, and live in</b></p> <p data-bbox="1890 740 2085 863"><b>Reduction in child abuse in organisational settings</b></p> <p data-bbox="1890 884 2141 975"><b>Improved responses and reporting of child abuse</b></p>

# Appendix

## Appendix A – Child Safe Standards

Child Safe Standard	Description
1. Child Safety is embedded in organisational leadership, governance and culture	A child safe organisation is committed to child safety. This is demonstrated in its leadership, in the way the organisation is managed and by the day-to-day activities it carries out. A child safe organisational culture drives the way things are done and how issues and risks are managed.
2. Children participate in decisions affecting them and are taken seriously	Children are safer when organisations teach them about their rights to be heard, listened to, and believed. A child safe organisation actively seeks the opinions of children and when doing so considers their age, development, maturity, understanding, abilities, and how they communicate. Children are encouraged and supported to be involved in decisions that affect them.
3. Families and communities are informed and involved	Staff in child safe organisations understand that parents, carers, and other important people in a child's life have the primary responsibility for raising their children. A child safe organisation talks to, consults with, and invites the participation of families, caregivers, and the broader community to promote the rights of children.
4. Equity is upheld and diverse needs are taken into account	A child safe organisation provides culturally safe and child-friendly services. It pays attention to equity by considering children's diverse circumstances. It recognises that some children are more vulnerable to abuse than others or find it harder to speak up and be heard. Organisations should try to protect and support all children equitably. It recognises that all children are vulnerable but that some are more vulnerable to abuse than others or find it difficult to reveal or be understood when communicating that they have been abused.
5. People working with children are suitable and supported	Human resource management—including screening, recruitment, and performance reviews—plays a vital role in protecting children from harm. Child safe organisations make sure child safety is prioritised when they are selecting and managing staff. They recognise that a verified Working With Children Check (WWCC) is an important step, but that other screening practices must also be used.
6. Processes to respond to complaints of child abuse are child-focused	A child focused complaint process supports children who are exposed to the risk of harm and encourages them to speak up. Children, families, and staff know who to tell if they want to make a complaint of child abuse. Child safe organisations respond by immediately protecting children at risk. Complaints are addressed promptly, thoroughly, and fairly. Children who make a report are kept up to date about the way the complaint has been addressed and any outcomes. Feedback should be provided in accordance with their age and developing maturity. All adults understand their reporting obligations, including to external authorities. Child safe cultures create environments where staff can identify, and report suspected harm of children.

Child Safe Standard	Description
<p>7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training</p>	<p>A child safe organisation promotes continuous learning and provides regular ongoing education and training. Staff continually build their abilities to keep children safe. New knowledge and practices to prevent harm and abuse are continually emerging. Child safe organisations should consider themselves 'learning organisations' with a culture of continuous improvement.</p>
<p>8. Physical and online environments minimise the opportunity for abuse to occur</p>	<p>A child safe organisation adapts its physical environments to minimise opportunities for abuse to occur. Organisations offer a balance between visibility and children's privacy, creative play, and other activities. Child safe organisations also address risks in the online environment by educating children and adults about how to avoid harm and how to detect signs of online grooming.</p>
<p>9. Implementation of the Child Safe Standards is continuously reviewed and improved</p>	<p>Child safe organisations know that it takes ongoing effort to maintain a safe environment for children. Leaders embed a culture of learning and put in place systems to monitor and evaluate how they have implemented the Child Safe Standards. Staff keep up to date with emerging knowledge and trends to continuously improve practices and can demonstrate that policies and procedures have changed over time.</p>
<p>10. Policies and procedures document how the organisation is child safe</p>	<p>Child safe organisations have policies and procedures that describe how they maintain a safe environment for children. They know that these documents are only effective if they are implemented. Policies and procedures should be relevant to all aspects of an organisation and reflect the Child Safe Standards. They are championed by leaders, understood by staff, and available to the community in accessible formats and languages.</p>

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# Appendix B – Sample agreement clauses

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Where a prescribed agency enters into agreements with related bodies that provide services to children, for example through agreements to provide funding, the prescribed agency as part of their CSAP can implement clauses in agreements encouraging or requiring related bodies to implement the Child Safe Standards. Provided here is a sample clause to include in agreements. Further examples can be found [here](#).<sup>14</sup>

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## SCHEDULE X CHILD PROTECTION

### Child safe related laws

The Organisation should ensure that it meets its legislative obligations under:

1. Children’s Guardian Act 2019
2. Child Protection (Working with Children) Act 2012
3. Children and Young Persons (Care and Protection) Act 1998, and
4. All other related laws concerning child protection.

### Child Safe Standards

1. The Organisation should:
  - a. Implement the Child Safe Standards through its systems, policies, and procedures, including, for example, a Statement of Commitment to Child Safety, Child Safe Policy, Code of Conduct, Complaint Management Policy and Procedure, Human Resources Policy, and Risk Management Plan
  - b. Continually assess, plan, and review how it meets the Child Safe Standards
  - c. Encourage staff, volunteers, parents, and community members to undertake training on the Child Safe Standards offered by the Office of the Children’s Guardian, including how to prevent, identify, respond, and report child abuse in organisations
  - d. Distribute information about how to keep children safe in organisations to staff, volunteers, parents, and the community.

### The Child Safe Standards are:

1. Child safety is embedded in organisational leadership, governance and culture
2. Children participate in decisions affecting them and are taken seriously
3. Families and communities are informed and involved
4. Equity is upheld, and diverse needs are taken into account
5. People working with children are suitable and supported
6. Processes to respond to complaints of child abuse are child focused
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training
8. Physical and online environments minimise the opportunity for abuse to occur
9. Implementation of the Child Safe Standards is continuously reviewed and improved
10. Policies and procedures document how the organisation is child safe.

More information, training and support can be found at the [Office of the Children’s Guardian’s website](#).

The information contained in this Schedule is intended as a guide only. It is the Organisation’s responsibility to ensure that it complies with current child protection legislation and meets the Child Safe Standards.

14. Note – these examples are developed for Commonwealth agencies, but their structure can be adapted to the NSW context.

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ISBN 978-0-6451877-0-0

V. 1.0

