

Submission to the  
National Office for Child Safety

# Draft Evaluation Framework for the National Principles for Child Safe Organisations

29 August 2025



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# 2. About WACOSS

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The Western Australian Council of Social Service is the peak body for the community services sector and works to create an inclusive, just and equitable society. We drive social change through collective action and policy formulation, strengthening community services and influencing decision makers to ensure justice and equity.

With WACOSS members and the broader sector, we advocate with and on behalf of those who are the furthest from levers of power and influence, to amplify their concerns and seek justice, to create a society that genuinely works for the benefit of all and not just the few.

### 3. Introduction

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The Western Australian Council of Social Service (WACOSS) strongly supports the implementation of the National Child Safe Principles in Western Australia and works closely with key stakeholders in WA (including the Department of Communities, Royal Commission Implementation Team, Department of Premier & Cabinet, WA Commissioner for Children & Young People, WA Ombudsman, Council of Aboriginal Services WA and Lotteries West) to build knowledge and awareness, to provide and curate resources, and to implement a training and capacity building program for frontline community services.

More information on the WA Child Safe Project can be found at: <https://www.wacoss.org.au/wa-child-safe-project/> with resources and links also available via the WA Government Child Safe Organisations Hub at: <https://www.wa.gov.au/organisation/department-of-communities/child-safe-organisations>

WACOSS also participates and represents the WA community sector on the [National Child Safe Sector Leadership Group](#) (convened by NOCS) and the [National Coalition on Child Safety and Wellbeing](#) (convened by Families Australia to input into [Safe and Supported: The National Framework for Protecting Australia's Children](#)). We also participate in the [Supporting Communities Forum](#), [Child Safe Organisations Working Group](#) at the state governance level, and work closely with the Network of [Child Sexual Abuse Therapeutic Services and Indigenous Healing Services](#) (CSATS & IHS) to support the codesign and commissioning of frontline services for victims of child sexual abuse and harmful sexual behaviours among young people and to build their knowledge, skills and capability.

We would welcome the opportunity to discuss these issues further and to follow up on any questions and issues arising, if this can be of assistance. We also note that the sector surveys, before and after workshop questionnaires, and the feedback from our metropolitan and regional workshops and consultations are likely to be a key source of information for monitoring and evaluation of the implementation of the National Principles in WA. In this context, we are happy to work with NOCS and the team developing the framework to see how we can share useful data and to look at how we can improve our data collection to better meet the needs.

## 4. Framework Overview

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The implementation of the National Principles is of critical importance, not only in responding to the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, but also more broadly in creating an Australian community now and into the future where children and young people are safe and their health and wellbeing is supported.

Within this context, development of an effective national monitoring and evaluation framework (MEF) that is capable of measuring impact and assessing change across jurisdictions, considering the differences in legislation, regulation and service systems, is both a crucial and challenging task. The overall structure and design of the MEF is sound, it aligns well with the objectives of the National Principles and the 62 measures currently outlined in the National and Commonwealth Action Plans (NAP & CAP).

The draft program logic and its associated outputs, outcomes and longer-term impacts are also sound and clearly articulated. Our main area of concern is the capability gap between the identified outcomes and the existing suite of indicator measures and data sources for monitoring. This is where we are concerned that significant effort and resources are required at a jurisdictional, sectoral and program level to build capacity to meaningfully and consistently measure outcomes ... (as discussed further below).

## 5. Consultation Approach

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Another key strength of the approach outlined in the draft framework is the detailed approach taken to mapping the range of stakeholders, including children and young people with diverse experiences, families, community & organisational leaders, government agencies, peak bodies, and advocacy groups.

In planning stakeholder consultation, the MEF articulates intentional engagement with marginalised groups such as Aboriginal and Torres Strait Islander people, CALD communities, children in out-of-home care, children with disability, LGBTQIA+, etc. While we welcome the child centred focus approach in the method, we do note however that children are not always consulted at an organisational level, and therefore actual meaningful participation may be limited. We note the issue of the capacity and systems of community sector organisations for engaging with children and young people, families and communities, that is, Principles 2 & 3 (& 6) are the areas where services report the greatest challenges (particularly smaller and regional providers, as well as key sub-sectors such as early childhood education and care services) in our surveys.

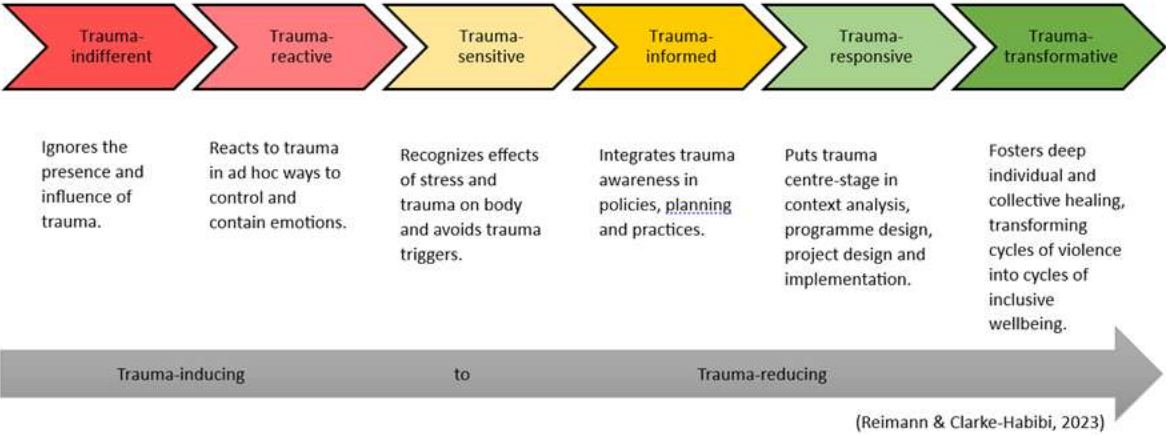
The downside risk of identifying a comprehensive list of stakeholders to consult in monitoring and evaluation, is that this is likely to be logistically challenging where states and territories, service systems and programs do not have in place established mechanisms for meaningful consultation. It will take effort and resources to ensure this does not become superficial and tokenistic, and that data is of consistent quality and depth across jurisdictions to allow useful comparisons.

A follow-on challenge is to ensure that the framework ensures there are meaningful and reportable processes for how feedback from marginalised groups, children and families will be incorporated into the evaluation process from start to finish. To be effective in this regard the framework needs to articulate how those implementing it (be it frontline services, state bodies, or the M&E consultants) will communicate with Aboriginal and CALD communities. These principles are well articulated within the MEF, but guidance is also needed about the practicalities such as if an interpreter will be used, if activities are co-facilitated with community elders, and how to manage data sovereignty protocols.

Importantly, trauma-informed practices are outlined within the framework, given the ever-present likelihood that service users, staff and other stakeholders engaged are likely to have lived experience of child sexual abuse (1 in 4 Australians, 1 in 3 women, 1 in 5 men ACMS 2024). To do this safely and well and in line with best practice, it is best to ensure both minimum standards of trauma responsive training for those undertaking these roles, as well as having support and referral strategies in place with the relevant local specialist services.

Note it may be helpful to make reference to a trauma-awareness spectrum of behaviours, as outlined for example in [Reimann & Clark-Habibi \(2023\)](#) that has up to 6 levels (trauma indifferent, trauma reactive, trauma sensitive, trauma informed, trauma responsive, trauma transformative).

**Trauma-Awareness Spectrum**



**6. Outcomes and Compliance**

One area of concern is the extent to which the measures are focused on tracking compliance, rather than articulating and measuring meaningful outcomes. Some concerns have already been raised about state and territory reporting on progress to date taking a ‘tick-box’ approach, focusing on quick wins and easy to measure outputs, rather than tackling the more systemic, underlying and challenging issues of culture, consistency, engagement and visibility. Concerningly, where this reporting data is currently listed within the Framework in Figure 2 page 29, there appears to be little analysis of the validity or reliability of this data, nor any process for ground-truthing jurisdictional claims with key stakeholders or frontline services (as discussed further below).

This issue of the comparative effectiveness of compliance-based versus strengths-based approaches to achieving meaningful child safety outcomes is currently at the centre of the national public discussion around quality and safety in early childhood education and care. While the current public debate has exposed the consequences of a lack of investigations and a lack of meaningful compliance activity in some jurisdictions, leading child safety advocates have been raising concern that compliance activity alone has limited efficacy in preventing harm and can only go so far in achieving longer-term child safety outcomes. While WA has a stronger record of enforcement activity than some other jurisdictions, we cannot be confident that there is not significant child harm occurring that has not been self-reported. Our discussions with sector leaders continue to highlight that we need to take a proactive approach to child safeguarding that focuses more on prevention, by building in training and certification, creating a team culture of safety and respect, foregrounding specific roles for child safe organisational champions, and strengthening the awareness of children and families (as discussed in the next section).

Over time, for the monitoring and evaluation framework to be effective in driving better practice, we need to be increasingly reporting on outcomes and not just outputs. For example, while it is an output for an organisation to have a policy or policies in place, a more meaningful outcome is that staff understand the policy and know how to implement it, and there is evidence of it being correctly applied as necessary.

Another critical gap is the assumption that all jurisdictions have legislation in place (and meaningful data collection and reporting systems). WA still has yet to legislate an Independent Oversight System, despite committing to do so in 2017, and WA Department of Premier & Cabinet completing a consultation process in early 2021 (see Appendix 2, p62). There are ongoing concerns with the reliance on self-assessment and reporting processes within government agencies, community and for-profit services, which may also impact on the reliability and quality of the monitoring data.

The WA Government has committed to progress trials of full-time four-year-old kindergarten on school sites in 2026, with the stated intent of expanding this to all primary schools where feasible into the future. However, the extent to which the WA Department of Education in WA actually complies with the national early childhood quality framework is unclear. Their early childhood services are not subject to review by the Early Childhood Regulation Unit within the Department of Communities WA, but rather they undertake internal self-assessment at the individual school level, and their data does not appear to be included in ACECQA reporting. As part of the transition to universal early childhood services we suggest it would be advisable for Education to be subject to the same level of independent oversight, and to comply with their Preschool Funding National Partnership Agreement requirements to report attendance, not just enrolment data.

In WA we need more collaboration across agencies and services across our reporting systems, as they currently don't speak to each other, creating a level of confusion and increasing the risk of issues of concern falling through the cracks. Ideally this should be done using consistent reporting templates across government departments so that there are standardized reports on progress against all indicators, the Working with Children Checks and Reportable Conduct Scheme, as well as information collected from the current self-assessment tools – ensuring all activities feed into the evaluation.

## 7. Staff Training Competency Benchmarks

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Effective child safeguarding within services and systems needs to be grounded in staff competencies that include how they interact with children and young people, with families and the broader community, as well as how they work with and oversight each-other ... and the policies and systems by which they report issues or concerns. Staff need to be confident that they are doing the right things, and are able to demonstrate to parents and the communities that they are appropriately qualified and safeguarded. They also need to be able to spot inappropriate or concerning activities and patterns of behaviour, and be aware of grooming and concealing behaviours and other red flags... and know how to navigate safely and appropriately report any concerns.

These issues are foregrounded in the crisis of public confidence being experienced in childcare services at the moment, and its' knock-on effects to workforce retention. Service are reporting that they are losing promising male early educators due to parents expressing concern and the lack of ability of staff teams or service managers to provide reassuring qualifications or certification. At the same time, we have reports of many male early childhood students being refused their final placements by services because of parent concerns and management risk aversion.

We need good men as teachers and role models in our early education and primary schools, and cannot afford to be losing the few we have with a genuine interest in and calling for this work. For those young children coming from dysfunctional families or with a history of abuse or neglect, this early exposure to safe and positive role models can be critical to their social and emotional development and path to recovery...

To be impactful and consistent, the framework needs to provide a relevant benchmark for staff training and qualification, that specifies what content is required to demonstrate compliance across the country. We need to ensure there is consistent and appropriate assessment of requirements at national and jurisdictional levels, which will involve consultation and alignment with state regulators. This will be problematic where regulation is not in place at the state level and relevant standards cannot be invoked.

## 8. Indicators, Measures and Data Sources

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The framework does a good job of bringing together a useful list of indicators and measures that are logically linked to the key evaluation questions for each of the National Principles. The key challenge and most critical gap is likely to be the availability and quality of the data sources at the jurisdictional level, their consistency in meaningfully measuring key outcomes, and their consistency across jurisdictions. Some of the areas where we are concerned these gaps and challenges may be the greatest include: leadership and culture; involvement and engagement of children, young people and families; upholding of child's rights; cultural safety; inclusion & diversity (see Table 1 page 15-26).

Data collection and reporting are inconsistent and patchy across jurisdictions. Not all states and territories are currently collecting the same type of data. In some cases, for example the WA self-assessment tool, no data is collected at all. It would make sense to update the existing 2019 CCYP WA self-assessment tool and implement it as an online form with secure data, allowing WA to better assess

how well organisations are implementing the national principles – and to better target outreach activities, resources and support to target sub-sectoral gaps or those specific principles where implementation is lagging.

Having found the monitoring and evaluation framework to be quite comprehensive in its’ consideration of the principles, their indicators and possible measures, we were taken back by the assessment of State and territory data sources and data collection in Figure 2, page 29. The figure shows WA flagged as dark green (data collected and reported) across 4 of the domains, and orange (unsure) for the monitoring and compliance domain (as below).

**Figure 2 State and territory data sources**

	RCS	Monitoring and compliance	WWCC	Resource and training	Self-assessment
New South Wales	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Victoria	Dark Green	Dark Green	Dark Green	Dark Green	Red
Queensland	Light Green	Orange	Dark Green	Dark Green	Dark Green
Western Australia	Dark Green	Orange	Dark Green	Dark Green	Dark Green
South Australia	Red	Orange	Dark Green	Dark Green	Red
Australian Capital Territory	Dark Green	Orange	Dark Green	Dark Green	Red
Tasmania	Dark Green	Orange	Dark Green	Dark Green	Dark Green
Northern Territory	Red	Orange	Dark Green	Dark Green	Red

**Note:** **Dark Green** means the collected and reported on in some form, **light green** means it is either in development or partial, **red** means it is not collected, **orange** means it is unclear

In our view, the RCS data collection and reporting by the WA Ombudsman is the only place where we can genuinely say that meaningful data is collected and reported. At the same time, the most recent WA Ombudsman’s 2025 Report [Western Australia’s Reportable Conduct Scheme: A review of systems to protect children](#) highlights big gaps in capability and raise serious concerns about the challenges with stage 2 of RCS implementation in WA, particularly in relation to smaller and regional organisations. It found a lack of integration of the Scheme into the reporting systems of organisations, raised concerns with the readiness of organisations to investigate allegations of reportable conduct, as well as the adequacy of procedures in place for the storage, access and disclosure of investigation information.

In relation to monitoring and compliance, WA still does not have in place an Independent Oversight Mechanism, so there is no data being collected and reported in that regard. The most recent (2025) [Monitoring of Child-Focused Complaints Systems Report](#) by CCYP WA highlights a significant need

for improvement. It finds many organisations lack child-centred policies, fail to promote their systems to children, and do not involve young people in system design.

In relation to Working with Children Checks in WA, this is overseen by the WWC Screening Unit within the Department of Communities. Individual organisations have obligations to collate and preserve screening and compliance data, but there is no public or parliamentary reporting process on outcomes or performance, as noted (as ‘unknown’) in Appendix 2 on page 62 (as below). In relation to training and resource data, the draft framework analysis is out of date – with the main (or only) child safe services training delivered in WA delivered by the [WA Child Safe Project](#), and the most up to date resources available via the project through the Department of Communities [Child Safe Hub](#).

As mentioned previously, the self-assessment form for organisations developed by CCYP WA in 2019 is a self-guided document only and does not collect any data as such. However, as part of the child safe project scoping and evaluation, WACOSS has undertaken a number of community sector surveys in collaboration with Department of Communities WA and the WA Peaks forum, with a questionnaire that builds on 2019 CCYP WA self-assessment tool. In addition, metropolitan, regional and online training workshops have included assessment of staff awareness and organisational progress on implementation.

	Reportable Conduct Scheme	Compliance and monitoring data	Training and resource data	WWCC	Self-assessment
WA	<p>WA Ombudsman Annual Report</p> <ul style="list-style-type: none"> <li>• Number of notifications reportable allegation</li> <li>• Notifications of reportable allegation by sector, type of reportable conduct</li> <li>• Action taken to prevent reportable conduct.</li> <li>• <a href="#">Ombudsman Western Australia Annual Report 2023-24</a>.</li> </ul>	<ul style="list-style-type: none"> <li>• Child friendly complaints monitoring process survey conducted by the <a href="#">WA CCYP</a></li> <li>• Department of Premier and Cabinet leading work to develop an <a href="#">Independent Oversight System</a> which includes the monitoring and enforcement of the principles.</li> <li>• WA CCYP Office promotes and supports child safe principles.</li> </ul>	<p>WA CCYP provides links to Australian Human Rights Commissions 11 e-learning Module and other national resources.</p>	<p><b>Unknown</b> what data items may exist regarding working with children checks. Working with children check is administered by the WA Department of Communities.</p>	<p>WA have a <a href="#">self-assessment</a> for organisation to use for their own purposes. This is not collected centrally.</p>

From a WA perspective, we struggle to see how under existing arrangements the framework can be effectively applied under the program logic domains to assess the six long-term outcomes and medium-term outcomes 2,4,7,9,14 & 15 under headline indicator 8 *‘Increase in organisations implementing the National Principles for Child Safe Organisations’* (as below). There is currently no integration between the different safeguarding mechanisms here in WA, which creates a concerning gap.

- *2. Communities, organisations and government implement child safety policies and practices and have a culture where the best interests of children and young people and survivors are a priority.*
- *4. Digital technologies are used to promote child safety and respond to child sexual abuse.*
- *7. Organisations responsible for harm restore trust from victim and survivors.*
- *9. The workforce and organisations are resources to recognise and respond to child sexual abuse with high-quality care.*
- *14. People and organisations are aware and comply with their responsibilities regarding child safety.*
- *15. Systems are better connected and consistent to identify and respond to offenders, perpetrators and people at risk of perpetrating child sexual abuse.*

## 9. Culture, Leadership and Governance

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The area of culture, leadership and governance has emerged in our consultations and training with frontline staff through the WA Child Safe Project as a key gap and a barrier to organisational performance. This issue is potentially exacerbated in the West by the lack of progress on an independent oversight body in WA, and with it the lack of systematic high-level engagement with organisational leadership (particularly CEOs and Boards) about child safe principles and practices. To this end we have developed specific webinars on '[Governing for Child Safe Organisations](#)' (for Boards) and '[Strengthening CEO and Executive Leadership in Child Safe Organisations](#)' and actively promoted them through WACOSS Newsletters and the WA Peaks Forum.

Leadership is critical within this context to driving cultural change and to embedding lasting policies and practices within organisations. Currently we do not have a method of measuring culture or tracking if executives are making child safe decisions, nor if staff are translating this effectively into policy and practice. To get a real measure on culture and practice, we really need to be able to correlate responses on knowledge and practice from frontline and administrative staff as well as families and children. We also want to be monitoring the extent to which plans, practices and policies are reviewed and updated on a regular basis, implemented across programs within an organisation, and embedded into recruitment, induction and training processes.

Once-off training on child safety is likely to improve inadequate, particularly for staff who are not regularly exposed to child safety concerns, and in organisations where there is regular staff turn-over. Ultimately, we need to have standardized training with regular refreshment, and organisational reporting on employee performance – ideally to the national body that will administer the national WWCC system.

## 10. Family Awareness and Participation

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As noted earlier, the national principles in relation to engagement and inclusion of children, young people, families and communities – their consultation and input into policy and practice, their knowledge of safe practices and complaints mechanisms – are consistently flagged as the most challenging for staff to implement into policies and practices. Where this does occur within services it can be seen as tokenistic invitations to a single meeting or survey, or a poster or two on the walls – rather than genuine involvement in designing policy. Ideally, we need a measure of ‘regularly invited to participate’ with some qualification about what counts as regular, plus a measure of ‘my concerns and suggestions were actively included and influence the final outcome’. This issue was highlighted in the recent (2025) "[Monitoring of Child-Focused Complaints Systems Report](#)" by CCYP WA, which found that complaints systems were not child focused, most organisations did not consult children nor have mechanisms in place to inform them how to make a complaint.

To make meaningful progress on these national principles we need both changes to the qualifications and training we provide to frontline staff, and changes to how programs are designed and services operate to actually enable inclusive practice. This is not easy and needs to be resourced and supported – doubly so when it comes to engagement with marginalised groups, and culturally secure practices with Aboriginal and CALD families.

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