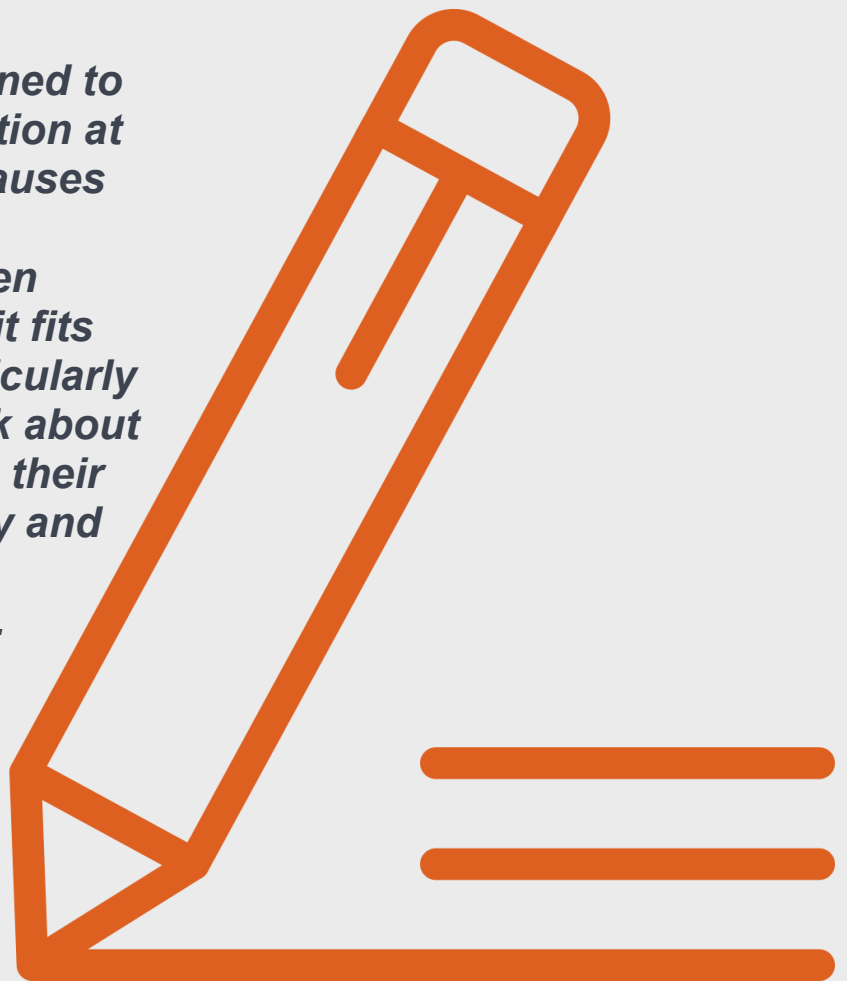


Child Safety Annual Reporting Framework Submission

Children and Young People with Disability Australia's Submission to the National Office for Child Safety's Consultation Paper

“[Safeguarding] is designed to run through an organisation at every level. That often causes implementation issues, because there hasn't been enough focus on where it fits in the organisation, particularly for those who don't think about working with children as their core work” – Child safety and risk assessment group, CYDA's CSO Report p22.

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Children and Young People
with Disability Australia



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A note on terminology:

Throughout this submission, Children and Young People with Disability Australia (CYDA) uses person-first language, e.g., person with disability. However, CYDA recognises many people with disability choose to use identity-first language, e.g., disabled person.



Content warning: *References to violence, harm, abuse and risks to safety.*

Acknowledgements:

Children and Young People with Disability Australia would like to acknowledge the traditional custodians of the Lands on which this report has been written, reviewed and produced, whose cultures and customs have nurtured and continue to nurture this Land since the Dreamtime. We pay our respects to their Elders past and present. This is, was, and always will be Aboriginal Land.



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Summary of recommendations

Recommendation 1: Foreground priority equity cohorts, including children and young people with disability, as a safety priority in the framework by:

- a. **Committing to provide tailored information and resources to organisations about child safety for priority equity cohorts** such as definitions and data around child safety related to disability, and a bespoke resource kit and training/coaching on child safety in relation to priority equity cohorts.
- b. **Encouraging meaningful lived experience involvement of children and young people in organisations** such as lived experience advisory groups, and channels and guidelines for involvement that also include safeguards.

Recommendation 2: Incentivise participation in the framework by:

- a. **Giving public recognition to organisations by** introducing measures such as a child safe accreditation visibly recognising child safety compliance, a national media campaign featuring exemplary child safe organisations, and a national day to recognise and reward child safety.
- b. **Providing guidelines and support to organisations to meet their reporting requirements** such as templates and guidelines, connecting reporting to existing child safe legislation and frameworks, providing funding for accessible versions of reporting, and running an annual workshop offering advice on reporting.

Recommendation 3: Embed collaborative and positive accountability measures into the framework through:

- a. **Encouraging a collaborative process around the Charter of Commitment** and the use of additional accountability tools.
- b. **Undertaking capability building about accountability for organisations** by offering training for staff and volunteers in child safety and ensuring that organisations address feedback provided through the National Office feedback mechanism.
- c. **Creating a positive culture around accountability** by establishing a shared network and community of practice that can share examples, benchmarks and best practice to improve accountability.

Introduction

Children and Young People with Disability Australia (CYDA) is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has extensive national networks of young people with disability, families and caregivers of children with disability, and advocacy and community organisations.

Our vision is that children and young people with disability in Australia will fully exercise their rights, realise their aspirations and thrive in all communities. We do this by:

- Raising community attitudes and expectations
- Championing initiatives that promote the best start in the early years for children with disability, and their families and caregivers
- Leading social change to transform education systems to be inclusive at all points across life stages
- Advocating for systems that facilitate successful life transitions to adulthood
- Leading innovative initiatives to ensure the sustainability and impact of the organisation and the broader sector.

CYDA welcomes the opportunity to provide a response to The National Office for Child Safety's (National Office) consultation paper on the proposed model for a child safety annual reporting framework. We commend the National Office in developing a framework that is accessible and flexible for a wide range of organisations.

CYDA is committed to child safety, and has implemented child safe policies and procedures including tasking an internal working group on child safety to audit and review CYDA's organisational processes in line with the National Principles for Child Safe Organisations (National Principles).

Our submission builds on CYDA's extensive experience with, and work into, child safety and the prevention of child sexual abuse for children and young people with disability. This work has highlighted the need for more information, safeguards and resources for organisations to ensure child safety for children and young people with disability.

The submission draws on evidence from a range of sources including:

- CYDA's role leading the multi-year Child Safe Organisations project, funded by the National Office. Through this project, CYDA facilitates consultations with young people with disability, parents, caregivers, and organisations and is developing co-designed resources for organisations to implement the National Principles and promote the safety of children and young people with disability.
- CYDA's submission to [The National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper](#) in 2021.

- CYDA's involvement in the Royal Commission into Institutional Responses to Child Sexual Abuse National Redress Scheme from 2018 to 2023. CYDA participated in several internal and external stakeholder groups and communities of practice, as well as providing information and support about the Scheme to our membership of children and young people and [developing resources on child safety and prevention of abuse](#).

Direct quotes in this submission are drawn from the findings of consultations with young people, families and caregivers, and stakeholder organisations from CYDA's 2022 [Child Safe Organisations Project Report](#) (the CSO Report). Quotes are indented from main text, italicised and in inverted commas, anonymised (or pseudonyms used) to protect privacy and minimally modified for brevity and/or clarity.

Additionally, this submission was shaped by CYDA staff, the majority of whom have personal and/or family experience of disability, and/or lived experience of child sexual abuse.

The submission has been reviewed by subject matter experts on child safety, one with family experience of disability; as well as a lived experience expert and policy professional who is a young person with disability.

Submission structure

The submission is structured in three parts, corresponding to CYDA's three recommendations. Each part leads with our recommendation and is followed by a more detailed response to the National Office's Consultation Paper.

Part 1 outlines CYDA's support for the proposed resources and supporting materials to build capability of organisations and makes additional suggestions to better foreground priority equity cohorts (referred to as priority cohorts throughout the submission), including children and young people with disability, as a safety priority.

Part 2 affirms CYDA's support for the proposed voluntary framework and suggests further ways to incentivise uptake of the framework by organisations through providing recognition and support.

Part 3 underlines CYDA's support for accountability measures built into the proposed framework and suggests further ways to embed accountability through collaborative and positive measures.



Recommendation 1: Foreground priority equity cohorts, including children and young people with disability

Recommendation 1: Foreground priority equity cohorts, including children and young people with disability, as a safety priority in the framework by:

- a. Committing to provide tailored information and resources for organisations about child safety for priority equity cohorts such as:
 - definitions and data around safety for children and young people with disability to assist organisations in understanding its importance,
 - a bespoke resource kit and training/coaching for organisations on child safety in relation to priority equity cohorts, including resources on safety for children and young people with disability.
- b. Encouraging meaningful lived experience involvement of children and young people in organisations such as:
 - lived experience advisory groups,
 - channels for their involvement that include safeguards to ensure participation is clear, safe and well-defined.

CYDA agrees with the framework proposal to provide resources and materials to participating organisations, to assist in capability building around child safety.

CYDA makes the following additional suggestions to better foreground children and young people as a safety priority in the framework.

While many of our suggestions relate to children and young people with disability, we strongly recommend that this be incorporated into the framework in a holistic way that acknowledges the intersectional experiences of children and young people from diverse backgrounds. This entails an emphasis on all priority cohorts including First Nations, culturally and linguistically diverse, LGBTIQ+, and regional/remote communities. It is important to address these groups holistically as a safety priority to acknowledge that people with intersectional identities can be multiply marginalised.¹

Making priority cohorts visible in the framework is of vital importance, as these groups have complex safety needs that require greater understanding and capability building for organisations.

¹ Bern et al (2018) [Ten Principles of Disability Justice](#). *Women's Studies Quarterly* 46(1): 227-230.

a. Provide tailored information and resources about safety for priority equity cohorts

Provide data and definitions about child safety and disability

Organisations need up-to-date data and information sources outlining the disproportionate risks to safety faced by children and young people with disability (and other priority cohorts). This information will highlight why child safety is a such an important priority when working with children and young people with disability.

CYDA recommends the National Office provides such data as part of the resources and supporting materials designed to build capability amongst organisations.

A 2012 international study found that children and young people with disability are three to four times more likely to experience abuse or violence compared to their peers without disability.²

In Australia, the 2017 Royal Commission into Institutional Responses to Child Sexual Abuse confirmed similar high rates.³ Other Australian sources that demonstrate the prevalence of high rates of abuse and violence against children and young people with disability include:

- Australia's National Research Organisation for Women's Safety's 2022 research report on domestic and family violence experiences of children and young people with disability.⁴
- A 2017 Western Australian study of the maltreatment risk for children with disability.⁵
- The Australian Institute of Health and Welfare's data on child sexual abuse⁶ and family, domestic and sexual violence against people with disability.⁷
- The 2023 Australian Child Maltreatment Study, that illustrates how child maltreatment is linked to the acquisition of chronic mental and physical health conditions.⁸

² Jones et al (2012) [Prevalence and Risk of Violence Against Children With Disabilities: A Systematic Review and Meta-Analysis of Observational Studies](#). *Lancet*, 380(9845), 899-907.

³ Royal Commission into Institutional Responses to Child Sexual Abuse (Commonwealth) (2017) [Final Report: Preface and Executive Summary](#).

⁴ Australia's National Research Organisation for Women's Safety (2022) [Connecting the Dots: Understanding the Domestic and Family Violence Experiences of Children and Young People with Disability Within and Across Sectors](#).

⁵ Maclean et al (2017) [Maltreatment Risk Among Children With Disabilities](#). *Pediatrics* 139(4).

⁶ Australian Institute of Health and Welfare (2024) [Child Sexual Abuse](#).

⁷ Australian Institute of Health and Welfare (2025) [Family, Domestic and Sexual Violence: People With Disability](#).

⁸ Haslam et al (2023) [The Australian Child Maltreatment Study: National Prevalence and Associated Health Outcomes of Child Abuse and Neglect](#). *The Medical Journal of Australia* 2018(S6).

These studies also point to the importance of holistic and intersectional approaches, that take seriously the increased safety risks for children and young people who belong to more than one priority cohort.

The National Office could provide these sources to organisations along with other information about the safety impacts and risks for other priority cohorts.

CYDA also recommends that the National Office provides organisations with an agreed-upon approach to defining and supporting disability.

Currently there is no nationally agreed-upon definition of disability. Recently, CYDA advocated to the Australian Bureau of Statistics for a nationally agreed-upon best practice approach that is strengths-based, allowing children and young people to define their own identity and share their lived experience.⁹

This approach is underpinned by the social model of disability, which places the onus on societal barriers that prevent people with disability from participating fully in society and ensures that disability is framed in a positive light that centres identity.

“One of the biggest challenges organisations face is understanding the social and the cultural model of disability rather than viewing disability through a medical model, and understanding that there are different barriers for different children with disabilities based on their cultural background or their gender” – Advocacy organisations (CSO Report, p38).

The National Office can support organisations to adopt this approach by encouraging them to:

- promote and talk about disability in ways that do not place blame or deficit on the individual, but rather acknowledge the impact of social barriers on how disability is perceived and experienced,
- adopt an organisational culture which allows people to safely self-identify as having a disability, that is also cognisant of their right not to identify under the Disability Discrimination Act¹⁰,
- ask any questions about disability (for example, in surveys about access needs) in an open-ended way that allows people to choose whether to self-identify as a person with disability,
- ask about any access needs, supports or accommodations children and young people with disability might require.

⁹ Children and Young People with Disability Australia (2024) [Submission to the Australian Bureau of Statistics Consultation on Collecting Data about Disability](#).

¹⁰ Australian Human Rights Commission (2025) [Identifying as a Person With Disability in the Workplace](#).

Provide bespoke resource kit and training/coaching about child safety in relation to priority equity cohorts

CYDA recommends a bespoke kit about child safety and priority cohorts is provided to organisations as part of resources for capability building. This kit would include best practice resources selected by the National Office to provide a strong grounding in promoting and upholding child safety for First Nations, culturally and linguistically diverse, LGBTIQ+, regional/remote, and disabled children and young people.

If there are any gaps in resources for priority cohorts, CYDA recommends that the National Office funds the development of new resources to address these gaps.

In terms of resources for children and young people with disability, CYDA has developed a *Responding to Disclosures of Sexual Abuse by Children and Young People with Disability* guide, as well as a series of factsheets with case studies on how to identify and respond to violence, abuse and harm.¹¹

CYDA has also co-designed resources on child safety and disability for organisations as part of the Child Safe Organisations Project funded by the National Office. These are in the final stages of development, at the time of this submission.

CYDA recommends that these resources are included in the bespoke resource kit to organisations, alongside other relevant resources.

CYDA points to the need to outline complex safety risks for children and young people with disability in regional and remote areas. These locations pose unique challenges due to their small and often close-knit nature, where potential offenders may have multiple points of access to children and young people, as well as being deeply embedded and trusted by communities.

CYDA also recommends the National Office provide targeted training and coaching to organisations on understanding the needs of and risks to child safety for priority cohorts, such as intersectional, cultural awareness and disability awareness training.

“Organisations that don’t work with children with a disability as their core business ... struggle with understanding what disability actually is and how it presents, and it’s all of the ideas of like ‘it fits into this particular box and all we have to worry about is ramps’, is consistent with organisations that work with a wide range of children and young people. So, I think resources on understanding disability as a starting point ... and then being able to translate that into the way that they work with the children that they work with” – Child Safety and Risk Assessment group (CSO Report, p27).

¹¹ Children and Young People with Disability Australia (2023) [Resources on Child Safety and Prevention of Abuse](#).

b. Encourage meaningful lived experience involvement of children and young people

A key part of capability building around child safety is ensuring that children and young people are visible, valued, respected and represented in organisations, including in decision-making or leadership roles:

“Have young disabled people of marginalised identities actually in their organisation. It proves that they’re safe for people like me” – Young people with disability (CSO Report, p21).

“Have a policy around child’s voice, and adhering to that. Because when I do my things at work, I listen to my students’ voice. If they are tired, or if they need an adjustment at that moment, I need to act. So, organisations need to do the same thing” – Young people with disability (CSO Report, p23).

Provide meaningful engagement guidelines to organisations

CYDA recommends that to support capability building, the National Office provides guidelines to organisations about how to meaningfully involve children and young people from priority cohorts. This could include:

- establishing a lived experience advisory group that provides strategic direction and advice to the organisation,
- employing staff and volunteers who are young people from priority cohorts,
- providing co-design opportunities to children and young people from priority cohorts, where they can be involved in the development of organisational services, processes and/or resources,
- creating clear feedback channels (such as complaints processes, surveys, and access needs forms) for children and young people to provide their views and concerns.

“I like to suggest that organisations should have a board observer programme for under-age youths because directorship of most organisations is often open only to adults. The mere presence of under-age youths in board meetings will bring them to the foreground of adult board members’ decision-making. It is ironic that a lot of the NGOs focusing on children do not have under-age youth on their board” – Young people with disability (CSO Report, p20).

“A lot of the time complaints or even accountability mechanisms aren’t actually set up in a way to be pursued by children and young people with disability” – Advocacy organisations (CSO Report, p19).

In line with this recommendation, CYDA also suggests that National Office utilise the lived experience of their current advisory groups to advise on the implementation and rollout of the Child Safety Annual Reporting Framework.

Emphasise parameters and safeguards to organisations

CYDA emphasises that any lived experience involvement of children and young people must be accompanied by information and support with appropriate parameters and safeguards.

As highlighted in Australia’s Disability Strategy’s Good Practice Guidelines for Engaging with People with Disability¹², it is important to define the level of participation, provide an inclusive environment, identify any access barriers, give clear information in advance, pay participants for their time, and provide feedback channels.

In the case of children and young people, extra safeguards will be necessary to ensure that there is no risk to safety or chance of exploitation.¹³

CYDA’s response to the National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper provides examples of best practice approaches to working with children and young people with disability.¹⁴

These approaches should be paired with significant therapeutic supports, as children and young people may not have completely processed their experience and reliving or sharing it may cause compounded trauma and/or retraumatisation.

“[There’s] this idea of, ‘Yes, but that wouldn’t happen here.’ ... there is no acknowledgement that there is malicious kind of harm or that we are potentially attracting people – like staff and volunteers, for example, who have a specific intention of being harmful to young people” – Child, family and youth services (CSO Report, p17).

¹² Department of Social Services (2023) [Good Practice Guidelines for Engaging with People with Disability](#).

¹³ Australian Institute of Family Studies (2017) [Understanding Safeguarding Practices for Children With Disability When Engaging With Organisations](#).

¹⁴ Children and Young People with Disability Australia (2021) [Response to the National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper](#).



Recommendation 2: Incentivise through recognition and support

Recommendation 2: Incentivise organisations to embed the framework through:

- a. Giving public recognition by introducing measures such as:
 - a child safe accreditation visibly recognising child safety compliance,
 - a national media campaign and case studies featuring exemplary child safe organisations, and
 - a national day to recognise and reward child safety.
- b. Providing guidelines and support to organisations to meet their reporting requirements such as:
 - making templates and guidelines available,
 - connecting reporting to existing child safe legislation and frameworks,
 - providing funding for accessible versions of reporting, and
 - running an annual workshop offering tips and advice on reporting.

CYDA supports the existing incentives in the proposed framework, including making uptake voluntary and the approach flexible, creating a support network for sharing good practice, providing resources and supporting materials, and creating a feedback mechanism from the National Office. The proposed central online register where organisations can publicly commit to the child safety framework also goes some way to providing public recognition.

These are all important incentives that reduce the administrative burden on organisations and build their capability to implement child safety, which is particularly valuable given the focus on organisations not typically covered by existing child safety frameworks, and for those who may be time-poor and/or underresourced.

CYDA makes the following suggestions to further incentivise organisations to participate in the framework. Our suggestions relate to the need for more public channels for recognition when participating organisations promote and uphold child safety, as well as further support to organisations regarding reporting requirements.

a. Give public recognition

Child Safe accreditation

Public visibility and recognition is a strong incentive for encouraging safe and inclusive behaviour in organisations.

Initiatives that enable organisations to benchmark against best practice, achieve accreditation or awards, have been shown to incentivise uptake and lift standards through positive role modelling and recognition.

For example, Diversity Council Australia's (DCA) 'Inclusive Employer Index' assesses participating organisations, and announces the list of Inclusive Employers who exceed the National Index Benchmark.¹⁵ DCA celebrates their achievement through a range of media promotions, and the designation as an Inclusive Employer extends over a two-year period. Inclusive Employers are also able to display the 'Proud to be an Inclusive Employer' logo in their own communications.

The Rainbow Tick is a world first quality framework to help health and human services organisations become safe and inclusive for the LGBTIQ+ community¹⁶. Organisations receive a three-year accreditation and are assessed according to six standards of inclusion by an independent assessor – the Quality Innovation Performance and Australian Council on Healthcare Standards. Once they receive accreditation, organisations can display the Rainbow Tick to demonstrate they are a proven LGBTIQ+ safe organisation.

UNICEF has developed the Child Friendly Cities Initiative, to provide resources and networks for cities to benchmark against the United Nations Convention on the Rights of the Child.

CYDA recommends the proposed framework introduces a Child Safe accreditation such as a tick or stamp, to recognise and reward the efforts of organisations towards promoting and upholding child safety.

The Child Safe accreditation would provide a concrete way for organisations to demonstrate their commitment and compliance. Organisations could promote and be recognised for this by displaying the Child Safe accreditation in their communications and venues.

However, CYDA cautions that in order to maintain the integrity of the Child Safe accreditation, there would need to be measures of accountability built in. This may include a regular review to ensure compliance, and a process for removing the accreditation if organisations do not comply.

¹⁵ Diversity Council of Australia (2024) [DCA's Inclusive Employers](#).

¹⁶ Rainbow Health Australia (2025) [Rainbow Tick](#).

“From the moment the child walks through the door, what language are we using? What does the environment look like? What do the signs look like on the wall? What messaging are we giving them around child safety and inclusion? That’s something tangible that I think sometimes gets left out is our physical environments and making sure that they’re inclusive and that we’re giving those messages” – Child, family and youth services (CSO Report, p19).

National child safe media campaign and case studies

Another way to recognise and reward participating organisations that are promoting and upholding child safety would be for the National Office to fund and launch a national media campaign on the Child Safety Reporting Framework.

CYDA recommends that a key element of the campaign would be to celebrate organisations demonstrating child safety. A public campaign would recognise the efforts of these organisations, and provide best practice examples to newer participating organisations.

The National Office could feature any outputs from this national campaign (videos, etc.) along with case studies of organisations who are demonstrating child safety on the childsafety.gov.au website.

National Child Safety Day

The National Office could also recognise and celebrate organisations demonstrating child safety through hosting a National Child Safety Day. This would have the dual benefit of promoting a national focus on child safety.

National Child Safety Day would be a means to raise awareness of issues around child safety in Australia, as well as recognising best practice examples of child safety.

This day could coincide with the National Association for Prevention of Child Abuse and Neglect’s (NAPCAN) National Child Protection Week held annually in September.¹⁷

Similarly to other cause-driven days of significance such as National Volunteer Week,¹⁸ the day could be led from the bottom-up as an opt-in celebration by communities and organisations. The National Office would act as the central online hub by providing resources on their website for organisations to use in promoting and celebrating the day, such as factsheets, posters, and certificates of appreciation.

¹⁷ National Association for Prevention of Child Abuse and Neglect (2025) [National Child Protection Week](#).

¹⁸ Volunteering Australia (2025) [National Volunteer Week](#).

Organisations participating in the child safety framework could choose to host their own internal and/or external celebrations to recognise and reward their organisation, staff and volunteers, and promote key messages.

b. Provide guidelines and support for reporting

CYDA is concerned that a major barrier to uptake of the proposed framework will be the added burden of reporting.

It is noted that the National Office has proposed several support incentives to mitigate this burden, including a flexible approach to reporting and a central repository where organisations can view examples of reporting approaches. CYDA recommends more targeted support provided around reporting.

Templates or guidelines for annual reporting

While CYDA understands the need to offer flexibility with reporting approaches, and timeframes to allow organisations to tie in with their existing internal reporting requirements, there still needs to be infrastructure provided to organisations to ensure they meet reporting requirements.

This is particularly the case for time-poor organisations, or organisations that are new to implementing child safety, to ensure they know what they need to report on.

CYDA recommends the National Office provides templates or guides to organisations, to give them parameters and understanding around reporting requirements.

Connect reporting with existing legislation and frameworks

CYDA is also wary that the offer of flexible approaches as an incentive, may actually result in more work for both organisations and for the National Office, by having too many variations in reporting.

We suggest that there can be flexibility in how the reporting is presented (e.g. part of existing annual reports or organisational reporting frameworks) but that the content is standardised and connected to existing national and state legislation requirements.

There cannot be the assumption that organisations will have the time to read all the different legislation and frameworks to ensure they are meeting each set of requirements. Templates and guidelines that are informed by legislation, and standardise the process, will assist organisations greatly to meet these requirements.

“[T]here are differences in State and Federal requirements that can be difficult to navigate” – Advocacy organisations (CSO Report, p22).

Fund accessible versions of reports

As part of capability building for organisations in being inclusive (a key child safety feature), it is also important that reporting is undertaken in an accessible manner. This includes both the reporting process and any outputs.

CYDA recommends the National Office provides funding for child friendly and Easy Read versions of any reporting outputs (such as annual reports) so the reports are accessible to the children and young people they are intending to keep safe.

“Accessibility of documents and resources is important. As well as being pretty, easy to read, and including pictures to be engaging. There also needs to be text versions, and Auslan versions to ensure accessibility” – Advocacy organisations (CSO Report, p23).

Run an annual workshop on reporting tips

As a further capability building feature of the proposed framework, the National Office could host an annual ‘how to’ workshop on reporting requirements.

The workshop would be optional for participating organisations, and would provide an opportunity to learn about current legislation, reporting requirements, and approaches to meeting these.

The workshop could also include a Q&A session at the end to allow organisations to ask for assistance or support, and to hear from one another about issues or solutions.

CYDA recommends the workshop be timed to be before any existing reporting cycles (e.g. organisation’s Annual General Meetings at the end of each year), to allow them adequate time to incorporate the guidance.



Recommendation 3: Embed collaborative and positive accountability measures

Recommendation 3: Embed collaborative and positive accountability measures into the framework through:

- a. Building accountability into the framework:
 - encouraging a collaborative process around the Charter of Commitment and the use of additional accountability tools.
- b. Undertaking capability-building about accountability for organisations by:
 - offering free training for staff and volunteers in child safety, including recognising risks, responding and reporting,
 - ensuring that organisations address feedback provided through the National Office feedback mechanism.
- c. Creating a positive culture around accountability by:
 - establishing a community of practice/shared network where organisations can share examples, benchmarks, and best practice to improve accountability.

CYDA agrees with the existing accountability measures in the proposed framework, including listing organisations in a central repository, the requirement to self-publish a report annually, a Charter of Commitment to ensure integrity, and the development of a feedback mechanism from the National Office in the service of continuous improvement.

CYDA also makes the following suggestions on how to further strengthen accountability measures for organisations participating in the framework.

We emphasise that these measures should not create more work for organisations, but rather be built in to the process. They should also focus on promoting a collaborative and positive culture around accountability that emphasises the ethical and moral principles underpinning the need for accountability – i.e., ensuring the rights and safety of children and young people are upheld.

a. Build accountability into the framework

Encourage a collaborative process around Charter of Commitment and the use of additional accountability tools

A Charter of Commitment can build a positive culture of accountability for an organisation.

However, for this to be most effective, the process by which the Charter is developed is as important as the Charter itself.

CYDA recommends that organisations are encouraged to develop their own Charter of Commitment in a collaborative way that involves their staff, volunteers and children and young people in the process.

This will ensure the Charter of Commitment reflects the organisational culture and values, and the commitments are embedded into actions that everyone is collectively committed to and understands how to implement.

“Well, it’s also building culture, isn’t it? Culture of the organisation, around acceptance, and around even the typical people that use the organisation. The whole culture of inclusion there ... So, I think it’s not only giving the information that they need to understand and be aware, but also then building the culture amongst their own team and their own users of the service” – Parents and caregivers (CSO Report, p19).

It should also be emphasised that the Charter of Commitment can be displayed visibly in their organisation. This would act as both an assurance of accountability and compliance to young people and families, as well as an incentive to organisations (similar to a Child Safe accreditation) by publicly highlighting their commitment to child safety.

CYDA further recommends that a suite of accountability tools are made available for use by organisations to scaffold the development and implementation of the Charter of Commitment.

Unlike the Charter of Commitment, these tools would not be a requirement of participating in the framework, but rather would be made available as part of supporting materials for organisations.

Such tools are already available at the Child Safe Organisations website and include an Introductory Self-Assessment Tool for Organisations to reflect on their child safe practices, a Child Safety and Wellbeing Policy template, a Child Safe Code of Conduct template, and a Checklist for Online Safety.¹⁹

¹⁹ Australian Human Rights Commission (2025) [Practical Tools for Implementing the National Principles for Child Safe Organisations](#).

b. Undertake capability building about accountability

Accountability also needs to be embedded in organisations through capability building. While providing accountability tools and supporting materials will go some way to ensuring this, CYDA also recommends that the National Office takes a more hands-on approach and provides the resources organisations need for upholding child safety.

“A challenge I’ve seen systemically in organisations in trying to implement organisational policy or operational elements to support child safety has been lack of funding to actually be able to implement that in an effective way” – Advocacy organisations (CSO Report, p41).

Offer free training sessions for staff and volunteers on child safety

Similar to the workshop on reporting, the National Office could offer annual or quarterly free training sessions for staff and volunteers at participating organisations on how to promote and uphold child safety.

These trainings would have a practical focus on identifying risks and preventative approaches, how to respond to disclosures of abuse in a trauma-informed way, mandatory reporting obligations, and how to report instances of abuse or violence.

An alternative to running training sessions would be for the National Office to provide training materials to participating organisations (e.g., training manual, practical videos) to run their own training sessions for their staff and volunteers.

*“My mum had to go in and be like, ‘okay, this is what she needs. This is how you need to do it.’ She had to train staff. Or she had to drag my OT in there to tell everybody the same stuff that my mum was telling them!”
– Young people with disability (CSO Report, p17).*

Ensure organisations implement National Office feedback

CYDA agrees with the need for a feedback mechanism from the National Office, included in the proposed framework.

We further suggest accountability measures be built in to the feedback mechanism.

A feedback mechanism or evaluation from the National Office may identify areas in which an organisation is upholding child safety, as well as areas for improvement.

As a part of receiving this feedback, there should be a requirement for organisations to then incorporate and address this feedback in the next reporting cycle.

This would include demonstrating how they are maintaining the areas in which they received positive feedback, as well as the steps they are taking to address the areas for improvement.

c. Create a positive culture around accountability

Establish a shared network with communities of practice where organisations can share ways to improve accountability

CYDA strongly agrees with the proposal to establish a shared network amongst participating organisations in the framework.

There are proven benefits of peer sharing and mentoring²⁰, including the provision of up-to-date information and examples.

We suggest that such a shared network should include a set of topics or working groups for organisations to focus their discussions around key issues.

These topics could be used to build communities of practice around shared focus areas, for example organisations working in culturally diverse communities, or with children with disability, or young men.

Noting that the proposed framework would apply to a wide range of organisations, this would be a useful way to link commonalities, and organisations could belong to several communities of practice at once.

One of these key topics should focus on ways to maintain and improve accountability. This would allow participating organisations to build a positive culture around accountability by discussing concrete examples, benchmarking, and best practice.

Such a collective focus would elevate accountability beyond tick-boxing and reporting to become part of a shared practice and commitment.

²⁰ Lancaster et al (2023) [Effectiveness of Peer Support Programmes for Improving Well-being and Quality of Life in Parents/Carers of Children With Disability or Chronic Illness: A Systematic Review](#). *Child: Care, Health and Development* 49(3): 485–496.

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