National Strategy to Prevent Child Sexual Abuse Final Development Consultation Paper

1. Do the proposed vision and objective reflect what our aim should be and what success should look like under the National Strategy?

Overall, NACCHO is supportive of the proposed vision and objective of the National Strategy to Prevent Child Sexual Abuse (National Strategy). Child sexual abuse disproportionately affects Aboriginal and Torres Strait Islander people and this must be recognised and addressed in the Strategy throughout implementation and evaluation.

Accurate statistics for Aboriginal and Torres Strait Islander child sexual abuse are difficult to collect due to the nature of child sexual abuse, the significant underreporting, mistrust of police and government authorities, experiences of racism, and fears that children will be removed. Considering these issues, rates of sexual abuse reported to police for Aboriginal and Torres Strait Islander children aged 0-9 are 2 to 4 times higher than rates among non-Indigenous children¹.

Aboriginal and Torres Strait Islander children aged 0-17 are more than 8 times more likely to be subjected to child abuse or neglect compared to non-Indigenous children². Similarly, they are 17 times more likely to be under youth justice supervision and 28 times more likely to be detained in a youth justice facility as non-Indigenous young people³. Physical and emotional abuse and neglect and presence in youth justice facilities are highly correlated with an increased risk of experiencing child sexual abuse. These statistics add weight to the belief that child sexual abuse figures for Aboriginal and Torres Strait Islander children are chronically underreported. A lack of cultural competence in these institutions compounds the risk of sexual abuse and prevents survivors from disclosure and seeking support.

The implementation of policies, services, and programs must align with the National Agreement on Closing the Gap and also address the social determinants of health. There must be a focus on holistic responses developed in partnership with Aboriginal and Torres Strait Islander people that integrate culture and acknowledge intergenerational trauma and its ongoing impacts.

2. Do the proposed values reflect the values that should be guiding our work under the National Strategy?

NACCHO is generally supportive of the six proposed values that should be guiding the work done under the National Strategy. Of particular importance is value four, that the government "work in partnership with Aboriginal and Torres Strait Islander people to embed cultural safety and trauma-informed practice in the design and delivery of child-safe initiatives." It is vital that the design and implantation of actions under the National Strategy align with the National Agreement on Closing the Gap. While it is positive to note that that National Strategy talks of working in partnership, it is vital that the National Strategy and its implementation incorporate the four Priority Reforms, which are:

³ AIHW, 2020. Youth detention population in Australia 2019









ABN 89 078 949 710

¹ AIHW, 2014. Indigenous Child Safety. https://www.aihw.gov.au/reports/indigenous-australians/indigenous-child-safety/contents/summary

² ibid, pg 13

- Shared decision making
- Building the community controlled sector
- Improving mainstream institutions
- Aboriginal and Torres Strait Islander-led data.

When designing and implementing actions in line with Value Four, the ongoing impact of colonisation and the Stolen Generations must be recognised; in particular the impact that this has on families and individuals reporting child sexual abuse to authorities. Culturally competent reporting and intervention frameworks need to be developed in partnership with Community.

To ensure that cultural safety is embedded in programs and that interventions are culturally competent and meet community need, they must be delivered by Aboriginal Community Controlled Health Organisations (ACCHOs) or other Aboriginal Community Controlled Organisations (ACCOs).

It is also essential that any funding provided to mainstream organisations to provide services for Aboriginal and Torres Strait Islander people must have accountability mechanisms in place to ensure that they are providing culturally competent services free from individual and institutional racism.

3. Do these strategic priority themes reflect the areas of focus for Australia over the life of the First National Action Plan and First Commonwealth Action Plan under the National Strategy (i.e. 2021-2025)?

Each of the five priority themes will require a targeted approach for Aboriginal and Torres Strait Islander people. Action will need be holistic and target the social and cultural determinants of health more broadly to see improvements.

In each area, genuine partnership between the Government and Aboriginal and Torres Strait Islander community-controlled organisations will need to occur, in line with the National Agreement on Closing the Gap to ensure that each of the themes are reflected in practice.

4. What are the best ways for Australian, state and territory governments to listen, engage and collaborate with these groups / individuals? Are there any groups you feel are missing?

Australian governments need to ensure Aboriginal and Torres Strait Islander leadership in every level of decision making structures. At the national level, the Australian Government must ensure that governance committees include representatives from relevant Aboriginal and Torres Strait Islander peak bodies. A national approach is needed to ensure consistency across the country. State and territory governments must also ensure there is genuine partnership with Aboriginal and Torres Strait Islander organisations when designing and implementing services.

Services must be tailored to local community needs to ensure they are culturally competent and effective. The priority reforms agreed to by all Australian governments in the National Agreement on Closing the Gap must be embodied in all actions that occur under the National Strategy.

The Aboriginal Community Controlled Health sector must be included in designing and planning services that are tailored to their local needs and cultures.



5. Are there best practice mechanisms, existing consultation mechanisms or comprehensive codesign approaches that Australian, state and territory governments should use to consult and partner with these groups / individuals?

NACCHO recommends that the National Office for Child Safety look to the success of the Covid-19 response in relation to Aboriginal and Torres Strait Islander people. During the Covid-19 pandemic, the Australian Government, along with its counterparts in the States and Territories, recognised Aboriginal and Torres Strait Islander people were highly vulnerable and that it would be catastrophic if the COVID-19 virus were to spread to communities. The high level of collaboration by the National Cabinet with the Aboriginal Community Controlled Health sector has been instrumental in achieving the low number of COVID-19 cases among Aboriginal and Torres Strait Islander peoples. This model of national coordinated policy that can be adapted to local need must be implemented in developing new and innovative responses to child sexual abuse.

The strategies with the most promise are those that have been developed by and with Aboriginal and Torres Strait Islander organisations and individuals. They focus on:

- family and community responsibility for raising children
- evidence-based approaches to early intervention and responding to child abuse and neglect
- engaging families in service design and delivery
- mobilising Community and family resources for caring for children.⁴
- 6. Do you belong to or represent one of these groups and wish to be involved in design and implementation of individual actions under the National Strategy once it is launched?
 - a. If yes, please identify which priority themes appear most relevant to you, noting you will have the opportunity to confirm your involvement in individual actions once the National Strategy is launched (and your answer here will not prevent you from being invited to be involved in actions outside any priority themes you have identified).

SNAICC – National Voice for our Children are the relevant peak body for Aboriginal and Torres Strait Islander Children and must be involved in the design and implementation of actions under the National Strategy.

The Joint Council on Closing the Gap agreed that investment priorities for early-childhood were the need to establish an Aboriginal and Torres Strait Islander early childhood development, protection, and care workforce and to build the capacity and capability of the sector to deliver services and provide policy development leadership in partnership with governments. These priorities should be reflected in the design and implementation of actions under the National Strategy.

Of particular relevance for NACCHO are priority themes 1, 2 and 3. These are areas where ACCHOs, in particular social and emotional wellbeing teams within ACCHOs, provide relevant services that acknowledge the unique, historical context of the Stolen Generations and the common experience of childhood institutionalisation for many Aboriginal and Torres Strait Islander people. NACCHO are willing to work in partnership with Government to design and develop culturally competent services and programs that facilitate access and support for Aboriginal and Torres Strait Islander people and address the risks and impacts of child sexual abuse more generally.

⁴ Royal Commission into Institutional Responses to Child Sexual Abuse Final Report (2017).

