



Framework for developing nationally consistent guidance for school teachers and principals for the prevention of child sexual abuse -Consultation

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Please indicate your name if an individual, or your organisation name if you are responding on behalf of an organisation

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The Australian Council of State School Organisations is a peak community organisation and the  
*One voice for every child in public education*

Do you wish your submission to be treated as confidential?

No

## AUSTRALIAN COUNCIL OF STATE SCHOOL ORGANISATIONS

### SUBMISSION TO THE

#### FRAMEWORK FOR DEVELOPING NATIONALLY CONSISTENT GUIDANCE FOR SCHOOL TEACHERS AND PRINCIPALS FOR THE PREVENTION OF CHILD SEXUAL ABUSE -CONSULTATION

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The Australian Council of State School Organisations (ACSSO) is the one voice for every child in public education in Australia. As an organisation, ACSSO welcomes the opportunity to make a submission to the consultation addressing the advancement of the Framework for developing nationally consistent guidance for schoolteachers and principals for the prevention of child sexual abuse.

ACSSO is committed to access, equality, equity of outcomes, excellence, and participatory democracy.

It is ACSSO's position that a safe and healthy school environment is conducive to effective learning and is important to the wellbeing of students and staff. Accordingly, education authorities have a responsibility to ensure that appropriate duty of care policies and guidelines are developed to assure the safety and wellbeing of students at school and on school organised activities. ACSSO believes that teachers and parents should be provided with training and development for mandatory reporting of suspected child abuse and that the welfare of students should be seen as an integral part of the total curriculum.

#### Focus Questions

- Do you agree with the elements contained in the Framework? Are there other necessary elements that you think should be included in developing the final guidance materials?

The historical practice for teachers and principals to take in preventing child sexual abuse has been grounded within a framework of legislation and government policy. As this proposed framework evolves, ACSSO anticipates new evidence-based ways of working and innovation will emerge to meet the needs of, and support, a child centred approach.

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*Sexual assault is a cultural issue; not a school sector, or a "it would never happen here", or "but my kid is a good kid" issue. That someone's abuse would be categorised by what they wore, how much they had to drink, or what school they went to is profoundly not the point.*

*That it happens at all? This is the point.<sup>1</sup>*

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Acknowledging that sexual assault is a cultural issue, schools will need to take deliberate steps to protect children from not only sexual abuse but also physical, emotional, psychological, and cultural abuse, and neglect. This commitment to protecting children must be embedded in the school's culture and policies. Whilst the framework is for teachers and the principal, it needs to highlight that the responsibility for acting must be understood and accepted by the entire school community not just the teachers and principal. As we have seen recently in the media it can happen in the halls of

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<sup>1</sup> <https://www.smh.com.au/education/schools-can-t-end-the-scourge-of-sexual-assault-adults-behaving-like-adults-can-20210222-p574qz.html>

the highest government office in the land, and it would appear that no one is ever held to account, is the point.

ACSSO expresses concern re the limitation of the framework/guidance identified on p11 of the CSAGL Project document “*The guidance material will focus on the prevention of child sexual abuse in school environments*”. Firstly, the audience is limited. Schools have a much larger and more diverse group of staff than just teachers and principals and whilst most jurisdictions have some form of Working with Children Check there is no formal training given to volunteers regarding identifying abuse and signs that may need reporting. Secondly, if the goal is the protection of the child, whilst child sexual abuse has and does occur within school environments, most of the abuse occurs external to the school environment. It is ACSSO’s belief that whilst the framework refers to teachers and principals the focus will need to be a broader one.

- Thinking about the guidance resource template, are there any changes you would make to the format, structure and type of information to make the guidance more useful in practice for school teachers and principals? Please include any changes you would make to the resource and any other suggestions in your written feedback.

ACSSO notes the template was a ‘mock-up’ and did not include any detail other than key element headings. ACSSO supports the approach being taken but would like further content information before it could comment on the guides usefulness.

We would also want to ensure language and terminology used in the document is accessible to all readers and *stress the importance of plain language*, using short sentences and everyday words throughout all documents.

- What kind of practical strategies and key actions do you think are most feasible for teachers and principals to take in preventing child sexual abuse? Please include any and any practical strategies and key actions in your written feedback.

We teach our children all sorts of ways to keep themselves safe. We teach them to watch the hot stove, we teach them to look both ways before they cross the street. But, more often than not, ‘body’ safety is not taught until much older — until sometimes, it is too late. But even more concerning is that only a small percentage of perpetrators are strangers to the child.

Children and young adults often will not talk because of shame, so parents, principals and teachers must be aware of and alert to the many signs that a child may be the victim of sexual abuse, and the signs depend on the age of the child. ACSSO believes that knowing the signs is incredibly important. Accordingly, it is imperative that the strategy addresses the many signs that a child may be the victim of sexual abuse.

We also know the benefits of family engagement in a child’s learning are well documented. Many families would welcome additional resourcing to support their children. It would be wise that the prevention strategies are shared with families in partnership to ensure similar meta-language or terminology is used.

ACSSO is aware of some great work regarding child safety in regard to abuse being undertaken within the ACECQA Early years Learning Framework and would be happy to discuss this further. Many pre-school environments engage with the children around personal safety and “permissions” with regards to their bodies.

- What needs to be included in the guidance resource template in order to adequately address diversity and inclusion?

The evolution of social media has given rise to influencers who have a clear impact on the way their followers, and the broader social audience, think about social issues, politics etc. This has led to a decline in trust in and deference to recognised experts.

Intrinsically, people are influenced by personal experiences and therefore can be biased when assessing others who differ from themselves.

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*Howard also lamented recent laws passed by the Victorian government banning gay conversion practices in the state, calling on those concerned by the laws to protest Victorian politicians.<sup>2</sup>*

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Adequately addressing diversity and inclusion in the framework is about creating an environment that is safe for 'diversity'. This means there is no assault, challenge or denial of identity or experience. The guidance resources, should view differences as strengths, adding more flavour to life.

The goal of the framework is to ensure that all children and young people grow up safe and cared for in family, community, and culture.

- What could be done to ensure that the interests, abilities, and cultures of all students are respected in the framework?

Just as teachers and principals who create culturally responsive environments have fostered a classroom where students become respectful and understanding of cultures different from their own, the framework needs to create a similar culturally responsive approach.

ACSSO believes the best way for this to be incorporated into the framework is to engage with people who come from different socioeconomic backgrounds, follow different religious traditions, speak different languages, or have a different sexual orientation or gender identity - incorporating their thoughts into the language of the framework and related strategies.

- Can you provide any best practice case studies in relation to the elements and strategies contained in the guidance resource template?

As stated previously the template was a 'mock-up' and did not include any detail other than key element headings. ACSSO is happy to engage with the Australian Institute of Family Studies to further the development of the strategy.

- What are existing resources/materials that you know of or use schools to prevent child sexual abuse? Please include any resources/materials in your written feedback.

ACSSO has anecdotal evidence of materials currently being used in schools and is happy to engage with the Australian Institute of Family Studies to further the development of the strategy.

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<sup>2</sup> <https://www.theguardian.com/australia-news/2021/feb/24/john-howard-calls-for-religious-schools-to-have-anti-discrimination-exemption>

- Do you have any questions for us? Please feel free to include questions in your written feedback, along with any other comments you may have.
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1. Page 9 of the draft framework states *“Although it is important for children to understand their rights and feel safe to make disclosures and complaints? the onus must not be put solely on children to prevent sexual abuse.”* ACSSO strongly believes that the onus should NEVER be placed on the child to prevent sexual abuse, this implies that the child is partially to blame for the abuse. ACSSO requests that the word ‘although’ be removed from the beginning of the sentence and a rewording to *“the onus must NEVER be put on children to prevent sexual abuse”*. The framework should not be engaging in victim blaming.
  2. As volunteers and as employed staff on National Education Boards we often question the fact that each jurisdiction has its own “compliance” check for working with children. As directors for ACSSO for example there is an issue of going into a school whilst students are present if we are not from the jurisdiction we are visiting. Like the National Police check we believe it would provide greater protection for transient families and school staff if this were a National Check
  3. What has happened with the National Framework for Protecting Australia’s Children 2009 – 2020, endorsed by the Council of Australian Governments in 2009, if it is no longer Why? If there is a new iteration how will it align with this Framework?