



Discussion Paper on
implementation of child
safety officers in Local
Governments
WALGA Submission

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1.0 Executive Summary

- There is a wide range of capacity and capability in Local Governments in relation to child safety; and they want clarity on what the minimum requirements (including reporting requirements) relating to child safety officers will be.
- There is a lot of concern for staff welfare and the potential organisational risks relating to having a child safety *officer*; alternatively it could be considered a *function* (similar to disability access and inclusion) with clear delineation between State and Local Government roles and responsibilities.
- State Government should provide Local Governments with:
 - supporting materials such as template policies, procedures and guidelines
 - key messaging and resources to promote and share in venues and facilities and online
 - ongoing training and skills development for Local Government staff to ensure that they can fill this function
- Similar to the approach in NSW, the oversight body to provide some support officers, who would be available to provide support and guidance to Local Governments.
- Many smaller Local Governments simply do not have the capacity or resources to fulfil this function; consideration should be given to a funded position that works with a number of Local Governments across a region to deliver this.
- WALGA will be advocating for ongoing consultation with a working group of Local Governments for further development of this Royal Commission recommendation

2.0 Introduction

The Western Australian Local Government Association (WALGA) is the united voice of Local Government (LG) in Western Australia. The Association is an independent, membership-based organisation representing and supporting the work and interests of LGs in Western Australia.

It provides an essential voice for its members who are 139 LGs, 1,215 Elected Members and approximately 22,000 LG employees as well as over 2.2 million constituents of LGs in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve. WALGA is appreciative of the consultation with LG that the Department of Communities and Department of Local Government and Cultural Industries (DLGSC) has undertaken in the review of legislation and regulations.

3.0 Background

DLGSC and Department of Communities released the “Discussion paper on the implementation of child safety officers in local governments” to consult on the recommendation 6.12 of the Royal Commission into Institutional Responses to Child Sexual Abuse.

In order to provide feedback on this submission WALGA hosted a series of online discussions with DLGSC and LG Professionals. Department of Communities were also able to participate in each session. **Xxx people from xxx** LGs participated in the online discussions, with participants from a range of roles; including, CEOs, Community Development, Governance, HR, Recreation Services, Libraries etc. There was a diversity in LG size, capacity and perspective. It is clear from the consultation that the majority of LGs acknowledge they have some role to play in protecting children. The main reservations come from the uncertainty about requirements and the resourcing implications of this, as well as concerns about what may be expected from a child safety officer, which is beyond the skill set of current LG employees.

WALGA acknowledges that this is a first stage in consultation from the State and is the phase identifying of opportunity and need; so there is not yet the need to LGs to make a decision about their level of participation. WALGA welcomes the early stage consultation with the sector, however recognises that it has caused some concern and confusion. WALGA encourages the State to form an expert advisory group of LGs to guide further policy development.

Whilst there is a wide range of views shared, some common themes emerged which are outlined below. The first part of the report refers to the questions from the discussion paper, and the second part refers to a range of issues and opportunities raised by the LG sector for consideration in any policy development.

4.0 Response to discussion paper questions

4.1 Developing child safe messages in local government venues, grounds and facilities

Currently Local Governments deliver a range of messages within their venues, grounds and facilities and if provided with the material do have the capacity to include child safe messaging as well.

Considerations:

- Local Governments currently deliver a lot of messages, and consideration would need to be given to over-saturation
- Most Local Governments want standard templates, messaging and designs for quick and easy distribution. Some (such as Shire of Meekatharra) would like the option to tailor such messaging as appropriate to their local communities.
- LG expressed the need for consistent messaging between LG and across other community-based organisations, so they would need to come from one key source.
- There is the potential for a significant financial implication depending on the type of signage required. The City of Mandurah provided a rough example, where a large Local Government could have 300+ venues, all requiring sign design, installation and maintenance; which could potentially require a \$150 000 investment. City of Rockingham also referred the beach safety sign project, which required significant financial investment
- There is a cost and resource requirement to develop, transport and install signage. For example, City of Wanneroo highlighted this during COVID response with the requirement to get QR codes displayed in all 300+ centres took a large time and resource effort. Conversely, the Shire of Gingin have 11 separate communities with multiple activity points in each, all a significant distance from each other and have a very small employee base to service this.
- Not all LG facilities are Local Government run, so it will be a lot harder to display material in these facilities.
- There is the opportunity to include information in hirer's contracts and lease agreements.

Requirements for support:

- LGs have indicated they would like signage designed and templates. Having this work already done would make this much easier.

- Depending on the scale / type of signage, and number of locations for it to be displayed additional funding support may be required.

4.2 Assisting local institutions to access online child safe resources

Local Governments generally indicated this would be simple to support, as these messages could be incorporated into existing LG websites, social media, e-newsletters etc.

A suite of online templates and resources readily available for use which signpost local community to the most appropriate information would be required. This could be achieved in much the same way that LG's have directed community to the most appropriate material during COVID.

4.3 Providing child safety information and support to local institutions on an as needs basis

This function was an area that has created some concern about the role of LG and has raised many concerns which are outlined in the general comments sections below; as this is where it takes the role of LG beyond information sharing and potentially beyond the scope of existing employee skills sets.

Some suggestions from LG are (noting these are all dependent on each LG's size, structure and resourcing):

- Incorporate into existing roles such as a Club Development Officer, Community Development Officer, Community Safety Officer, ensuring they know how to direct organisations to appropriate information or resources
- Develop or use existing multi-agency working groups. For example; the Shire of Plantagenet are a small regional LG with only 1 FTE for community development (no club development officer, community safety officer), so have limited capacity, but set up an effective interagency working group for COVID and see this could be a useful forum). The City of Mandurah are part of an existing interagency Early Years Network; however they noted they are fortunate that this is driven by local Not For Profits and would require resources if driven by the LG.
- LG could support state government to run information sessions for community organisations; LG could provide a venue, promotion to local organisations; while State could provide the expertise and knowledge.

Supporting Resources

- All LG staff involved would need some basic training and understanding. Types of training include:
 - Basic all employee awareness training
 - Mental health training

- Protective behaviours training
 - Mandatory reporting
 - Gatekeeping
 - Suicide prevention
- Access to the appropriate information, resources, templates, guidelines, consistent messaging so that the consistent messaging is used across the whole LG.
 - Access to an expert support officer that a LG can go to for information, guidance, resources, training. This could be similar to NSW, where there is Child Safe Coordinator for Local Government that sits within NSW Office of the Children's Guardian. Another approach is a model similar to that used by Department of Fire and Emergency Services, in support LGs in the emergency management arrangements, where there is an District Emergency Management Officer in each region which supports the LGs and locally based organisations. Having a support officer in each region assists to build LG capacity, enhance cross-agency collaboration and provides consistency of message even when LG staff change. Ultimately the more expert support that LGs have, the better they will be able to share the message and support the community. This is clear when considering Public Health Planning; LGs with access to local Department of Health officers supporting them, find the process considerably easier than those in regions without these officers.
 - Funding for/or access to an officer to do this work. Some of the smaller LGs simply do not have the current capacity to do this work. A funded position that works across multiple small LGs within a region, would ensure that this work occurs.

4.4 Supporting local institutions to work collaboratively with key services to ensure child safe approaches are culturally safe, disability aware and appropriate from children from diverse backgrounds.

Reponses to this are similar to those outlined above. Noting that LGs do considerable work in these areas and would be able to integrate as appropriate.

5.0 General Comments on Discussion Paper

Whilst the discussion paper highlighted four key areas to look at; the impact and implications of proposed child safety officers has raised a number of issues which are important for the State to be aware of in this early phase consultation. It is also important to note, that many LGs are considering recommendation 6.12, alongside implementing child safe principles to be a child safe organisation.

Regardless of current capability or capacity, there seems to be a clear message from Local Governments that they want clarity on the minimum requirements. There is a lot of uncertainty about this, with a number of concerns including; scope of work, overstepping scope of LG work, risk to staff. It has been challenging for LGs to provide information on what resourcing they need, when there is uncertainty on what they need to do

- Local Government Role

There is a wide range of capacity and capability in Local Governments; and regardless of this, they all want clarity on what the minimum requirements, including reporting requirements, relating to child safety officers will be. There is a lot of uncertainty about what expectations of LG, and therefore it has been difficult to anticipate the additional resourcing or support required without understanding the requirements. There is a whole spectrum of positions, with some larger metropolitan LGs have indicating that they have currently have capacity to absorb this function into their existing work through to some smaller LGs have indicating that they have no capacity at all to do this work.

Despite current capacity, a common concern across the sector is because they are not clear on expectation. It is difficult to articulate the resourcing need, without a clear understanding of the requirements. LGs have indicated that they it would be useful to have a checklist of the minimum basic requirements, including reporting requirements.

- Staff Welfare

There is a lot of concern for staff welfare and the potential organisational risks relating to having a child safety *officer*. Many LGs are confusing this role with a child protection officer, which is clearly beyond the current capability of Local Governments, and not something that LG sector would want any role in.

Page 8 of the discussion paper, it states “*..its would be important for anyone in this role to have appropriate knowledge and understanding of child abuse and neglect..*” which is causing a lot of concern, as LG do not have staff trained in this and are very concerned for the welfare of any staff who may be exposed to this. This is even more concerning in smaller regional areas, where it is possible that this officer may in fact may know many of the parties involved. Department of Local Government Sport and Cultural Industries and Department of Communities have verbally assured LGs that it will not be the same as a child protection officer, but there is no formal clarity around this, and this is creating a lot of uncertainty across the sector. Any policy position would need to this to be very clear.

The State should consider Child Safety as a *function* (similar to disability access and inclusion) within a LG, rather than an *officer*. Using a similar approach would allow for a clear delineation between State and Local Government roles responsibilities; limit risk to an individual, and allow LG to consider ways to strengthen child safety across all areas of the organisation; rather than limited to one team or area. It would also give scalability, rather than a ‘one size fits all’ that comes with an officer.

It is important to acknowledge, that some LGs are considering more broadly about the function of LG in child safety and some are already considering the whole-of-organisational approach. City of Wanneroo and City of Cockburn have already formed multi-disciplinary working groups (including community development, community safety, governance, legal, facilities, human resources) to consider the aspects of the organisation that can have a positive impact on child safety. One of the unique things about Local Governments is, the regardless of size, all LG cover a very diverse range of work, interacting with a range of community, business and other organisations. The discussion paper focuses on community development aspects of a LG, but there is are opportunities for LGs to take a 'whole of organisation' role in child safety (examples include: Environmental Health Officers and Building compliance officers may visit premises and see child exploitation, how do they know to do it?; include conditions in community grant applications; considerations in procurement etc)

- Responsibility for other organisations

There is also significant concerns within the LG sector about the responsibility and accountability of LG staff to liaise with community organisations and groups, and the potential consequences if an organisation or group is subsequently found to not be child safe. Will LG be ultimately be responsible for holding organisations and groups accountable to maintaining child safe principles and practices? Whilst most LG are willing to play their role and support community organisations as best they can, LG do not want to be held responsible for other organisations. The sector would be looking for clear direction on this.

- State Framework

It is generally accepted amongst LGs recognise that within their scope of work they have a supporting role to play in child safety, with the State Government having the ultimate responsibility for it. However, there is a wide range of variation in Local Government capability and capacity to deliver this this function.

The City of Karratha, acknowledge that they are well positioned to assist and play their role in safety; but would want to be clear on the National and State framework, as well as LG scope of work before they commit resources to it. Shire of Serpentine-Jarrahdale have very clearly indicated the desire to ensure that they have their own organisation well positioned as a child safe organisation, and ensure they have appropriate policies in place before they work with the broader community. The Shire of Gingin, consider this the role of State Government not Local Government. Many of the larger metropolitan Local Governments such as City of Wanneroo, Cockburn, and Melville have begun considering how they implement child safe principles across the whole organisation; yet even these early adopters are feeling confused and overwhelmed about the role of LG in child safety. It is clear that there is, and will always be a vast degree in approach by Local Governments, yet all would benefit from an understanding of the State's approach and role to get clarity on the role LGs in child safety.

Whilst not all LGs see this as the role of LG, if the State determines that it is, there should be legislative framework and therefore the resourcing that accompanies this. All LGs have a vast

range of competing interests and the need to be accountable to ratepayers; so even with the best of intent may struggle to prioritise this issue without basic legislative requirements. Where LG has a legislative function that becomes not negotiable (e.g. disability access and inclusion planning or local emergency management arrangements), This would ensure that the community accepts the role of LG here, and that their rates will be used for this.

- Support and Resources

As indicated in the responses above, LGs want access to templates, guidelines and templates that are easily accessible and shareable from one key source. Whilst many LGs have requested generic material, other have indicated the needs for it to be adapted for their local community if required (e.g. Meekathara highlight how they know their community and know they best way to share information with them, so what works in a large metro is not going to be suitable for them).

Local Governments also want template policies, procedures and guidelines to assist them with their work. Some smaller LGs with limited resources would really benefit from template council reports and policies, which they can easily adapt and use. Whilst there was a clear need for base requirements, there was also many LGs looking for guidance on how to do more than minimum requirements. This could include template policies, guidance for working groups, checklists, or ideas of what they can implement. LGs learn from each other, so opportunities to share examples and best practice ideas can be useful.

There will be a wide range of training requirements. Officers with a direct role will require specific training to support their work; however some LGs have expressed an interest in all employees having access to short online awareness training. With such a large number of LGs and LG employees across this state, it would make sense for this to be provided from the state oversight body. Smaller regional LGs can have high turnover in a small workforce, so they would need easy access on a regular basis to training.

Beyond access to training, LGs will need ongoing access to expert advice and support that they can not be expected to have within their organisation. This will ensure capacity building across the sector and enhance the capacity of LG without any additional resource requirements. As mentioned previously, this could be similar to the NSW model where the oversight body provides an officer that is solely available for LG to provide them with information and support; or ideally with 137 LGs, an officer to support each region.

It must be acknowledged that many smaller LGs just simply do not have the capacity to appoint an officer; and have no community safety, club development officer etc that they could incorporate as part of their role. It would be important that they have additional FTE resource that they could draw. A possible option would be an officer, that could be shared between multiple LGs within a region (in much the same way that an EHO may work across many). Without additional state funded FTE, it is likely that this is a function that will never be a priority, and therefore there is a real risk that this important work may just not happen in some areas, and potentially regions that may need it the most.

The state needs to consider how significant a role they want LG to play, as with current resourcing, even with the best of intentions, LGs capacity is limited. As well as investing in capacity building and supporting LG staff, funding additional FTE in regional areas, there also needs to be funding opportunities for greater investment. City of Mandurah described an example where they received \$150,000 to assist in a trial of a family and domestic violence toolkit. This funding made a significant contribution to the resources, community partnerships and workshops, which would otherwise not have been able to occur.

- Local Governments to be actively engaged in the ongoing Policy Development

Feedback from WALGA's Child Safety Working Group and the recent online discussion sessions indicated that the sector is very interested and invested in the implementation of the Royal Commission findings. Many LGs are committed to child safety and want to ensure that LGs play an effective and appropriate role in making this happen. To ensure a best practice and best-fit approach, WALGA encourages the State to establish a working group of LGs to guide the development of this work within this sector.

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6.0 Appendix: Engagement Methods

(Include list of LG who contributed)

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