

Department of Social Services

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Re: Establishing the National Centre for the Prevention of Child Sexual Abuse

As South Australia's Commissioner for Children and Young People, my mandate under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* is to advocate for the rights, interests and wellbeing of all children and young people in South Australia.

I am pleased to see the Department mention children and young people with problematic or harmful sexualised behaviour as a proposed area of focus for the National Centre for the Prevention of Child Sexual Abuse (the National Centre).

My office is currently undertaking some research on South Australian responses to children who display problematic and harmful sexual behaviours, (which will now be called harmful sexual behaviours). I am concerned that this issue is currently not given adequate attention, is not well understood and rarely talked about, which may further exacerbate the issue.

I think that it is important that the National Centre prioritises this issue to ensure that responses to children with harmful sexual behaviours are appropriate and consistent across all states and territories in Australia. I hope the following suggestions are helpful in guiding how this might be achieved.

Prioritising the rights and wellbeing of all children and young people

The rights and wellbeing of children and young people should be at the centre of the National Centre's work. One of the National Centre's aims is to "build the capability of organisations to treat children who display inappropriate or harmful sexual behaviours". Listening to the voices of children and young people themselves should be an essential part of meeting this aim.

I have heard from hundreds of children and young people about what organisations can do to create safe environments for children and young people. Children and young people tell me that they want to learn about their rights, know who they can trust and know that they will be listened to, believed and taken seriously when they report their concerns:

"Organisations need to make sure all children and young people are aware of how they can get help if they need and understand what to do in all unsafe situations."

"Knowing that there's no judgment towards me and that I'll be taken seriously."

“Educate children and young people on what their rights are, what violations of those rights may look like, and encourage confidence in their autonomy and ability to identify when they feel uncomfortable.”

Leading the development of appropriate responses at primary, secondary and tertiary levels

The National Centre is perfectly placed to take the lead to develop appropriate policy and service responses to children with harmful sexual behaviours. Responses should be informed by a public health approach and should:

- Be accessible to all children who are displaying or impacted by harmful sexual behaviours
- Focus on prevention and early assessment
- Be tailored to the child’s individual needs, the child’s age, developmental age, gender, disability, background and the nature of the child’s particular behaviour
- Involve families and carers where possible
- Focus on changing the behaviours rather than the child to ensure that children are not criminalised or stigmatised, and to acknowledge that children have great capacity for rehabilitation
- Involve collaboration and information-sharing between multiple agencies and sectors
- Be monitored and evaluated regularly.

Addressing gaps in research and data collection

There is currently no comprehensive research into, or clear and consistent data, collected on the prevalence of harmful sexual behaviours displayed by children inside and outside of institutional settings. Data from the criminal justice system is limited given that harmful sexual behaviours that reach a criminal threshold are likely to be under-reported. This data also fails to capture the prevalence of sexual behaviours that may not necessarily be criminal but are nevertheless problematic or harmful. However, some of the data collected during the Royal Commission indicated that the prevalence of harmful sexual behaviour is higher than child sexual abuse. The National Centre is well-placed to address these significant gaps in data collection and research.

Raising awareness and reducing stigma

Many adults do not know how to identify or respond to children with problematic or harmful sexual behaviours. There is a need for greater education in this area so that children, young people and adults can access the resources, support and services they need and so that services can respond in a non-stigmatising way.

Every child and young person should have access to comprehensive education and sex education about healthy and appropriate sexual behaviour, inappropriate behaviours, and where they can seek help if they feel unsafe. Education for adults should outline the differences between developmentally appropriate behaviours and problematic or harmful behaviours, and equip adults with information about which services are available and how to best respond.

While understanding and responding to children with harmful sexual behaviours is challenging and complex, it is necessary to ensure the safety, wellbeing and best interests of all children and young

people. The National Centre can play a key role in leading the development of comprehensive and nationally consistent responses and service models that are specialised, non-stigmatising and accessible to every child who is displaying or impacted by harmful sexual behaviours.

I hope these suggestions are helpful and I look forward to seeing how the National Centre progresses on this issue. If you have any questions or if you would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Helen Connolly

Commissioner for Children and Young People
Adelaide, South Australia