

12 February 2025

National Office for Child Safety

Via email: [NationalOfficeForChildSafety@ag.gov.au](mailto:NationalOfficeForChildSafety@ag.gov.au)

Jesuit Social Services welcomes the opportunity to comment on the Child Safety Annual Reporting Framework (the Framework).

Jesuit Social Services is a social change organisation working to build a just society where all people can live to their full potential. For over 48 years, we have accompanied the most disadvantaged members of the community, providing services and advocacy in the areas of justice and crime prevention; mental health and wellbeing; settlement and community building; education, training and employment; ecological justice; and gender justice, including child sexual abuse prevention.

We work with some of the most disadvantaged and marginalised members of our communities, who often experience multiple and complex challenges. Our programs are delivered across Victoria, New South Wales and the Northern Territory. We work where the need is greatest and where we have the capacity, experience and skills to make the most difference.

Jesuit Social Services has undertaken significant research on the perpetration of both child sexual abuse and gender-based violence. We also deliver a range of services to children and young people – including the Ignatius Learning Centre<sup>1</sup>. We have a long history of working with victim-survivors of child abuse and neglect.

Accordingly, our programs are delivered in line with the Commonwealth's National Principles for Child Safe Organisations (National Principles), and we comply with Child Safety Standards in all jurisdictions we operate in (Victoria, New South Wales and the Northern Territory).

Building an understanding of child sexual abuse perpetration is key to driving prevention, and ensuring initiatives are targeted effectively. In collaboration with the University of New South Wales (UNSW), Jesuit Social Services launched the world's largest [child sexual abuse perpetration prevalence study](#) in 2023. It revealed that one in six Australian men reports sexual feelings towards children, and highlights a range of risk factors, including key demographics, behaviours, attitudes and settings<sup>2</sup>.

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<sup>1</sup> The [Ignatius Learning Centre](#) is a Catholic Specialist Secondary School in Melbourne for boys aged 15-17 who are involved with the youth justice system.

<sup>2</sup> Salter et al. (2023). *Identifying and understanding child sexual offending behaviours and attitudes among Australian men*. Jesuit Social Services & University of New South Wales. ([Weblink](#))

We also work with adults who have harmed or are at risk of harming children and young people. We currently run *Stop It Now!*, a child sexual abuse prevention program for adults concerned about their own or someone else's sexual thoughts or behaviours towards children. We are developing a program called the Worried About Sex and Pornography Project for children and young people worried about their sexual thoughts and behaviours, including questions and concerns regarding pornography and child sexual abuse material.

Jesuit Social Services has previously made submissions to consultations on the National Strategy to Prevent and Respond to Child Sexual Abuse<sup>3</sup> and the eSafety Commissioner's Industry Standards<sup>4</sup>. We share the view of the National Office for Child Safety (National Office) that child safety is everyone's responsibility.

### **Support for the proposed framework**

In general, we support the proposed Framework as an enabler for non-government organisations to commit to upholding children's rights and protecting them from harm.

The Framework should reinforce the dual focus on safety and wellbeing as set out by the National Principles and state-based child safety standards, including that organisations ensure the voices of children and young people are heard.

While key details such as registration requirements are yet to be confirmed, the Framework could be particularly effective in engaging organisations that are not currently required to adhere to state or territory-based child safety standards. We anticipate that not all businesses that register will have direct interaction with children and young people, yet it remains valuable for organisations to build capacity to operate in a child safe way and promote child safety and wellbeing among their workforces and broader communities.

The Framework could leverage existing research into the perpetration of harm to children, including Jesuit Social Services and UNSW's [child sexual abuse perpetration study](#). For example, organisations could be required to demonstrate an understanding of factors involved in the perpetration of child abuse before signing the charter of commitment, and the resources and guidance could include key research on perpetration.

### **Proposed model**

Given the broad range of potential participants, a voluntary and flexible Framework is reasonable. This approach is likely to maximise adaptability and take-up across industries while minimising the administrative burden on organisations already required to report in line with state or territory standards.

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<sup>3</sup> Submission available via [weblink](#).

<sup>4</sup> Submission available via [weblink](#).

Jesuit Social Services does not expect that the proposed Framework will build our organisation's child safety capability in a significant way, due to the stringent reporting requirements with which we already comply. However, the opportunity to share knowledge with organisations operating outside of the community and government sectors may broaden our perspective on child safety matters.

The Community of Practice and other resources will be crucial for building capability in organisations who are at the beginning of their child safety and wellbeing journey, particularly given the National Office's limitations in providing individual feedback or technical guidance. As an organisation that values reflective practice and discernment, we support capability-building resources that acknowledge both positive and poor examples of practice.

### **Reporting mechanisms**

We support the design of a Framework that aligns with state and territory reporting requirements, as well as ongoing efforts to harmonise child safety standards across Australian jurisdictions.

While we do not hold a strong view on centralised versus self-published reporting, we recommend the Framework include a tiered registration system hosted by the National Office. This should indicate whether an organisation is registered under the National Framework only or is also required to comply with state/territory standards.

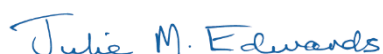
### **Other benefits**

The Framework could also create opportunities for social procurement approaches, whereby organisations seeking to champion child safety and wellbeing could require or incentivise contractors and suppliers to register. In a less formal sense, we also see opportunities for community organisations to leverage the Framework to encourage corporate partners to engage more deeply with child safety and wellbeing.

For instance, Jesuit Social Services partners with a range of organisations, such as banks and essential services, to deliver corporate diversity programs. These partnerships are grounded in a shared vision of building a more just society, and position us to guide and influence organisations to engage more deeply on a range of social justice issues – including child safety and wellbeing – particularly where an organisation is not covered by state or territory standards.

Thank you for the opportunity to comment on the proposed Framework. We look forward to its full introduction.

Yours sincerely,



Julie Edwards  
Chief Executive Officer