

STANDARD 4



Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice

4.1.2 The entity's Complaints Handling Policy [refer to Criterion 6.1] and practices demonstrate an understanding of barriers that prevent children from disclosing abuse and barriers for adults recognising and/or responding to disclosures, and articulates processes that reduce barriers to disclosure.

There are three key components to addressing this indicator:

- understanding the barriers that prevent children from disclosing abuse;
- understanding the barriers for adults to be able to recognise and then respond to disclosures; and
- outlining strategies to address these barriers.

Barriers that prevent children from disclosing abuse:

It is important to recognise some of the barriers which may prevent children and young people from disclosing abuse. There is key information which will need to be clearly communicated in the entity's Complaints Handling Policy and accompanying support documentation and training activities to evidence that these barriers are understood.

Some examples of the key information about the barriers which can prevent children from disclosing abuse would be:

- children believing that they have limited support available;
- children having feelings of self-blame, shame or guilt as a result of disclosing:
 - Feeling shame or embarrassment was noted by the Royal Commission in *Final Report: Volume 4, Identifying and disclosing child sexual abuse* as one of the most common barriers to disclosing institutional child sexual abuse¹;
- children being met with a lack of understanding and limited support from others (namely adults and those who are facilitating activities directed towards children/young people);
- fear and anticipation of negative reactions and consequences as a result of disclosing (both for themselves but also for others);
- fear of physical injury, isolation, causing family distress or family breakup, losing support, social shame or a ruined reputation are common reasons for children not wanting to disclose;
- fear of being blamed or feeling responsible for, and ashamed of the abuse prevents children and young people from disclosing:
 - feelings of being responsible for the abuse may be more common among children who are abused multiple times;

¹ Australia, Royal Commission into Institutional Responses to Child Sexual Abuse, and Peter McClellan, *Final Report*, vol. 4: Identifying and disclosing child sexual abuse (Sydney, N.S.W.: Royal Commission into Institutional Responses to Child Sexual Abuse, 2017), 78.

- relational and family dynamics between the alleged perpetrator and the victim, along with the victim's thoughts and feelings towards the suspected offender impact whether a child will disclose:
 - If the alleged perpetrator is in a powerful or significant position in relation to the child this can be a particularly strong barrier to disclosing abuse;
- young children find it particularly difficult to understand and name what is happening to them, which is why age appropriate education is so important;
- children not knowing where or who can provide support to them is a barrier to a child disclosing.

Importance of adults understanding barriers and being skilled to appropriately respond:

Being asked or prompted by a trusted and equipped adult, with the provision of developmentally appropriate information about sexual abuse, can help children overcome barriers to disclosing abuse. The provision of developmentally appropriate education intervention programmes can help facilitate a child's disclosure by reducing feelings of responsibility, self-blame, guilt and shame.

Recognising the barriers which could prevent a child from disclosing abuse enables the implementation of strategies to address the barriers. This is what indicator 4.1.2 is requiring entities to undertake and be able to demonstrate in their Complaints Handling Policy and procedures.

Entities need to be actively:

- identifying the barriers that prevent children from disclosing abuse:
 - this is articulated in the entity's Complaints Handling Policy and procedural documentation;
 - training programs provide personnel with information about identifying barriers; and
 - information material raise awareness about the barriers;
- articulating the strategies employed to address these barriers:
 - education and awareness activities which address these barriers are targeted towards children;
 - multiple avenues for reports to be made, and in various formats, are provided to children; and
- identifying the need for adults to be equipped to be able to recognise and respond appropriately to disclosures:
 - training programs provide education to adults about the indicators of abuse and how to respond to disclosures; and
 - clear information is provided to adults about how to respond to a disclosure of abuse and who the key contact person(s) is within the entity.



Examples of strategies to support child disclosures

The entity's safeguarding strategies and complaints handling systems need to encourage family members, friends and church personnel to be able to identify signs of sexual abuse, have personnel skilled to be able to then appropriately ask children about the possibility of sexual abuse, and then be able to respond supportively should the child disclose.

Some examples of the key strategies/conditions to put in place which can help a child to disclose abuse are:

- children being prompted or being asked directly about possible abuse:
 - the entity has personnel who are confident to respond to disclosures of harm in a child-focused manner;
 - training and professional development for personnel about both recognising the signs, but then also being able to respond appropriately to a disclosure is crucially important here (this is linked with 7.2.1 and specifically 7.3);
 - personnel are in place who are confident to respond to any concerns raised by children and young people and/or are aware of specialist staff/support people within the organisation they can contact to assist in progressing any type of disclosure;
 - personnel are clear about their reporting obligations and processes for different types of disclosures and can provide an appropriate level of information about next steps to the child;
 - children and young people are provided with a variety of safe ways to share concerns;
 - personnel know how to respond appropriately to any complaints, disclosures or suspicions of harm. Personnel will Listen/Respond-Reassure/Record/Refer-Report; and
 - all complaints are reviewed with a view to achieving systemic improvements;
- children and young people are provided with age appropriate information about sexual abuse – this is critical to facilitating disclosures as it supports the child or young person to understand what is happening and engage in meaningful conversations in which disclosures can be made (this is linked with 2.3.1);
- attitudes about abuse and disclosures are responsive and open – this is critical. Children receiving positive emotional support and understanding assists them to not feel guilt or shame (a key barrier to disclosing); and
- strategies which aim to build children and young people's confidence and assist them to develop skills in participation and speaking up are in place (this reinforces the importance of Standard 2).

Education and training programs which respond to barriers that prevent children from disclosing and the strategies to address these need to be evident in an entity's Complaints Handling Policy and procedures.

Key aspects of Complaints Handling Policy and procedures

An entity's Complaints Handling Policy and procedures need to demonstrate that the entity facilitates recognising and responding to a child's disclosure of abuse. This is evidenced by the fact that:



- the Complaints Handling Policy and processes are child-focused (the Complaints Handling Policy and processes clearly articulate the best interest of the child and Article 3 of the UNCRC), emphasising the needs of the child directing processes, whilst also attending to the entity's obligations. The entity needs to demonstrate that the Complaints Handling Policy and processes are understood by children, young people, families, staff and volunteers;
- there are multiple ways a child could make a disclosure (in person, by phone, online, by email or by social media). These include avenues which are specifically informed by and targeted to the needs of children/young people. The entity can demonstrate that there are communication/engagement/education strategies designed to accomplish this;
- there is scope to adapt complaint handling processes to suit the communication and support needs of children/young people and their parents or carers who take up concerns on their behalf;
- there are clearly defined processes to support children to make a complaint if they need to do so, such as engaging an advocate or support person;
- the Complaints Handling Policy and procedure state that the disclosure must be acknowledged immediately and a contact point for the child or young person and their parent or carer must be identified immediately after;
- clear timelines for responding to disclosures and ensuring that this is communicated to children and the parent/carer/support person are articulated.

Examples of material used to achieve this

Material which raises awareness of the barriers to disclosing abuse and which provides information about the strategies which should be implemented to address the barriers is crucial. This information should be linked with NCSS 2.3, 2.4, 3.5.1 and Standard 7).

Key questions when examining your current response to Indicator 4.1.2:

- Does your entity have documentation available which contains information about recognising potential barriers for children reporting abuse and helps adults to respond to disclosures?
- Is this targeted to different groups (those working with children, other Church personnel, families, children and the broader community)?
 - this could be in information material (fliers, notices, fact sheets etc);
 - provided by specific training and awareness programmes; and
 - be embedded in your policy and procedural documentation.
- Does your entity outline strategies which aim to address these barriers and thus seek to reduce their impact on preventing children from disclosing?
- Is this evident in your Complaints Handling Policy and procedures? Does your policy clearly identify what is required when handling a disclosure from a child and articulate how it is different to responding to a disclose of an adult?
- Do you have recognised child advocates, or is there a recognition of the specific support required to support child disclosures?

These are some key strategies which should be evident in your Complaints Handling Policy and procedures to respond to 4.1.2. These are linked with the requirements of Standard 6.



Additional Resources to assist you address 4.1.2:

Here are some additional resources which you may find helpful when looking to address the requirement of Indicator 4.1.2:

- Top tips for making a complaint: Commissioner for Children and Young People WA
- Responding to children and young people’s disclosures of abuse
- Complaint Handling Guide: Upholding the rights of children and young people: Commonwealth of Australia, Department of the Prime Minister and Cabinet (National Office for Child Safety)
- Fact Sheet – Complaint Handling Guide: Upholding the rights of children and young people. Department of the Prime Minister and Cabinet (National Office for Child Safety)
- Are you listening? Guidelines for making complaints systems accessible and responsive to children and young people. Commissioner for Children and Young People WA
- Barriers and facilitators to disclosing sexual abuse in childhood and adolescence: A systematic review, by Charlotte Lemaigre, Emily P. Taylor, and Claire Gittoes.²

² Charlotte Lemaigre, Emily P. Taylor, and Claire Gittoes, ‘Barriers and Facilitators to Disclosing Sexual Abuse in Childhood and Adolescence: A Systematic Review’, *Child Abuse & Neglect* 70 (August 2017): 39–52.

