

# Template for feedback

A Consultation Regulatory Impact Statement (CRIS) has been developed to examine options for child safe standards (CSS) and a reportable conduct scheme (RCS) to improve the safety of children who receive services from an organisation or institution (government and non-government), such as schools, childcare, health services, disability services and religious organisations. The overarching goal is to prevent abuse and reduce the severity of harm that children experience in Queensland organisations.



## We want to hear from you about:

This feedback template is provided to assist the preparation of submissions, but you may present your submission in other ways. We would like to hear from you whether you respond to all, or only some, of the questions.

Your feedback on the CRIS will help the Queensland Government understand and assess the impacts of the proposed options for CSS and RCS and identify any implementation issues or unintended consequences.

We want to know:

- whether we have accurately assessed the impacts of the reform options;
- whether you support the preferred options for action;
- whether you would change any components in the preferred options; and
- how the reforms can best be implemented to minimise any negative or unintended impacts.

Please indicate when making your submission if you want your feedback to remain confidential. Submissions not marked as confidential may be published in full or quoted in public documents.

- Email: [RC\\_SPAL@cyjma.qld.gov.au](mailto:RC_SPAL@cyjma.qld.gov.au)
- Mail: Strategic Policy and Legislation
- **Department of Child Safety, Seniors and Disability Services**

Locked Bag 3405  
BRISBANE QLD 4001

Submissions close on **22 September 2023** at **5.00pm**.

**1. To what extent do you agree that action is needed to improve the safety of children in organisational settings in Queensland? (Please highlight or circle)**

|                |                       |                           |                   |                   |
|----------------|-----------------------|---------------------------|-------------------|-------------------|
| Strongly agree | <b>Somewhat agree</b> | Neither agree or disagree | Somewhat disagree | Strongly disagree |
|----------------|-----------------------|---------------------------|-------------------|-------------------|

*Comments:*

The current safeguards such as criminal history checks and Working with Children Checks are not sufficient to protect children from harm in organisational settings in Queensland. Further action is needed, such as obligations for organisations that do not currently comply with the National Principles or the Royal Commission’s 10 CSS.

**2. Do you broadly support the Queensland Government implementing the Royal Commission recommendations for:**

|                                  | Support | Do not support |
|----------------------------------|---------|----------------|
| <b>Child safe standards</b>      | Yes     |                |
| <b>Reportable conduct scheme</b> | Yes     |                |

*Comments:*

We believe the organisations that already comply with the National Principles and/or the Royal Commission’s 10 CSS should be exempt from a Queensland CSS scheme, to avoid duplication of regulation.

## Part 3: Options for child safe organisations regulation

### Child Safe Standards (page 40)

The Queensland Government is considering what form the child safe standards should take in Queensland. We could adopt the wording of the 10 CSS from the Royal Commission, use the 10 National Principles for Child Safe Organisations (National Principles) (see **Appendix D**), or adapt either of these to respond to the Queensland context.

**3. Do you have a preference for what form the CSS should take in Queensland, and why? Would the form of CSS adopted in Queensland make a difference to your organisation?**

- Royal Commission’s 10 CSS
- 10 National Principles for Child Safe Organisations (National Principles)
- A version adapted for Queensland
- Adopting the Royal Commission’s 10 CSS or the National Principles would not make a significant difference to my organisation

*Comments:*

The Uniting Church in Australia Queensland Synod, UnitingCare Queensland and Wesley Mission Queensland all currently comply with the National Principles for Child Safe Organisations and/or the Royal Commission’s 10 CSS. We note that the National Principles for Child Safe Organisations reflect the 10 CSS recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, and that the National Principles have a broader scope that goes beyond child sexual abuse to cover other forms of potential harm to children and young people.

**4. Are there specific issues relevant to Queensland that need to be considered or reflected in the standards adopted in Queensland?**

n/a

**Cultural safety and considering the diverse needs of children (CRIS page 48 and supplementary material 2)**

Ensuring that cultural safety for Aboriginal and Torres Strait Islander children is embedded into any proposed child safe organisations system is a priority for Queensland.

For cultural safety of Aboriginal and Torres Strait Islander children we are considering two key approaches:

- *Create an additional child safe standard.* The Victorian Government has introduced an 11<sup>th</sup> child safe standard: ‘Establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal [and Torres Strait Islander] children and young people are respected and valued’. The benefit of this approach is that a specific standard puts cultural safety at the forefront, however, it could also mean organisations do not consider cultural safety fully in their application of the other standards.
- *Include cultural safety as a guiding principle across all standards:* Tasmania is proposing a universal principle that sits across all 10 standards to ensure the right to cultural safety of children who identify as Aboriginal or Torres Strait Islander is respected. The benefit of this approach is that a guiding principle could encourage consideration of cultural safety across all standards. However, a guiding principle could also be less obvious to organisations as it may not be clear the principle has legal status, or requirements for its compliance.

Please note – we welcome input from everyone on this question, and we are particularly interested in hearing from Aboriginal and Torres Strait Islander peoples about what you would need to see in a culturally safe system.

**5. How can we best embed cultural safety for Aboriginal and Torres Strait Islander children and young people in the child safe standards?**

Please select preferred option to embed cultural safety for Aboriginal and Torres Strait Islander children in the child safe standards:

- Create an additional child safe standard
- Include cultural safety as a guiding principle across all standards
- An alternative approach

*Comments:* We note that the National Office for Child Safety, in partnership with SNAICC, has already developed guidance based on the National Principles for Child Safe Organisations, for organisations to implement the National Principles in a culturally safe way. The *Keeping Our Kids Safe* resources provides guidance across all the National Principles for organisations to deliver the National Principles in a way that is culturally relevant and promotes cultural safety.

It is equally important that implementation of CSS as a whole, as well as the RCS, considers the diversity in Queensland communities, and recognises that children from culturally and linguistically diverse backgrounds may face greater risk of abuse in organisations, and a greater risk that institutions may not respond in a safe and appropriate way if abuse occurs.

**6. How can we best ensure the CSS embeds cultural safety for children and young people from culturally and linguistically diverse backgrounds?**

This is already covered in the existing standards: The National Principles provide for this under Principle (4): Equity is upheld and diverse needs respected in policy and practice, and the Royal Commission's 10 CSS provide for this under Standard 4: Equity is upheld and diverse needs are taken into account. Detailed guidance similar to the *Keeping Our Kids Safe* resources developed by the National Office for Child Safety in partnership with SNAICC, could be developed for stakeholders on how best to implement cultural safety for children and young people from culturally and linguistically diverse backgrounds. All information on CSS should be available in a range of languages and accessible formats.

The Royal Commission also identified other groups of children with diverse needs who must be considered when implementing child safe organisations, including children with disability, children from diverse religious and cultural backgrounds, very young children, children with previous experiences of trauma, and lesbian, gay, bisexual, transgender and intersex children.

**7. How can we best ensure that the Queensland CSS and RCS most effectively recognise diversity and the unique needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people?**

This is already covered in the existing standards: The National Principles provide for this under Principle (4): Equity is upheld and diverse needs respected in policy and practice, and the Royal Commission's 10 CSS provide for this under Standard 4: Equity is upheld and diverse needs are taken into account. Detailed guidance similar to the *Keeping Our Kids Safe* resources developed by the National Office for Child Safety in partnership with SNAICC, could be developed for organisation on how best to recognise diversity and meet the unique needs of the identified categories of children and young people. All information on CSS should be available in a range of languages and accessible formats. All information on CSS should be available in a range of languages and accessible formats.

**8. What support would your organisation need to apply cultural safety and best consider the diverse needs of children and young people in implementing the CSS and RCS?**

Detailed guidance with a range of examples on how to implement these requirements would be useful for organisations on how best to apply cultural safety and how best to consider the diverse needs of children and young people under the CSS and RSC.

**9. Is there anything else we need to consider to ensure cultural safety is appropriately embedded in a Queensland child safe organisations system as a whole (comprising CSS and RCS)?**

n/a

**Scope of organisations for child safe standards (CRIS, page 52 and Supplementary Material 3)**

The Queensland Government is still considering the scope of organisations that any regulatory Queensland CSS scheme would apply to, considering:

- the nature and characteristics of services provided by the type of organisation
- existing regulation
- consistency with approaches taken in other jurisdictions
- stakeholder feedback
- Royal Commission commentary and research informing its recommended scope categories
- ensuring the CSS system can deliver an effective, targeted, and proportionate regulatory response.

We are considering ways to target scope to organisations that:

- specifically provide services for children
- provide facilities specifically for use by children under the organisation’s supervision.

It is proposed that in any potential CSS system, obligations to comply would apply at a broad organisational level (rather than applying only to specific service streams or parts of an organisation). This would then be accompanied by the ability to implement the standards across various services, activities and environments in a flexible way that makes sense for the individual organisation’s circumstances.

**10. What do you believe are critical factors we should consider in determining the scope of the CSS scheme? Are any factors more important than others?**

We believe that the scope of organisations to be included in the CSS scheme should align with the categories of regulated employment under the *Working with Children (Risk Management and Screening) Act 2000*.

**11. Do you have any views on the scope of organisations CSS should apply to, including any of the sectors we are considering? (see Table 13, page 55)**

See answer to previous question.

**12. What factors should be considered if we were to require CSS compliance for the whole organisation, with flexible and tailored implementation for each service or service stream, activity or environment?**

n/a

**Integrated child safe organisations model (page 68)**

Both CSS and RCS seek to improve organisations’ ability to keep children safe and respond appropriately to allegations of child abuse. The Royal Commission considered that the oversight body for an RCS should also be responsible for monitoring and enforcing the CSS (which is the case in Victoria and NSW). Integrating oversight of the CSS and RCS within one body has the potential to more effectively build child safe organisations and practices in Queensland.

13. For organisations that work with the CSS and RCS in the same oversight body (i.e. Victoria and NSW), are there any other considerations we should be aware of regarding the schemes working together, based on your experiences?

n/a

## Part 4: Impact analysis of the options (CRIS, page 70)

14. Are the costs detailed in Tables 18, 19A and 19B regarding costs for organisations, relatively accurate approximations of the costs your organisation may face in complying with CSS and RCS? If not, is the actual cost likely to be substantially higher or lower, and why?

*Comments:*

*Please include any variations to activities, volumes and estimated costs that might apply to your organisation. If you wish to provide detailed information, this could be included directly into the tables above (19A and 19B).*

### **Child Safe Standards**

If the Queensland CSS are the same as the National Principles or the Royal Commission's 10 CSS, the estimated cost for our organisations to implement the Queensland CSS would be reduced substantially as we already have policies, procedures, training etc. that is compliant with these. If requirements different to these were implemented, we would require dedicated funding. Funding for other compliance and regulatory activity in organisations is usually provided for in relevant program funding. The proposed Queensland CSS & RCS is not associated with program funding, so there will be a financial impost on organisations to comply.

### **Reportable Conduct Scheme**

The main cost to organisations in implementing the RCS would be the cost of investigations that comply with the requirements of the RCS.

15. Will there be any other costs associated with the implementation of CSS or RCS from activities not captured by the estimates in Tables 19A and 19B (CRIS, page 73)? Examples of possible CSS compliance activities are included in Table 12 in Part 3 of the CRIS (page 46)

| <b>Additional activities for CSS implementation</b> | <b>Estimated costs (Please include expected volume/number if known)</b> |
|---|---|
| n/a   |   |
|   |   |
|   |   |
|   |   |

| <b>Additional activities for RCS implementation</b> | <b>Estimated costs (Please include expected volume/number if known)</b> |
|---|---|
| n/a   |   |
|   |   |
|   |   |
|   |   |



## Child Safe Standards

### Option 1 – No action and maintain status quo (CRIS pages 41 and 78)

**16. Do you support the Queensland Government taking no further action to implement the CSS in Queensland, with organisations able to choose whether to adopt the CSS? Why or why not?**

YES  NO

*Why or why not?* Some organisations in Queensland who are proposed to be in scope do not currently apply or comply with either the National Principles or the Royal Commission 10 CSS, so there is a need for these organisations to comply with a Queensland-specific scheme.

**17. What are the current challenges for your organisation/sector in supporting the safety and wellbeing of children in organisations? Do you think adopting the CSS in Queensland could help address these?**

| Current challenges to supporting child safety  | How CSS could help address  |
|--|---|
| Currently, investigations into misconduct that are conducted by organisations and/or police may not result in an allegation of misconduct being upheld and a criminal charge being sought, where harm has been suspected or observed in a workplace setting. Options are limited for organisations to remove the person suspected of misconduct, due to unfair dismissal laws. In addition, this information cannot be distributed to potential future employers or a regulatory body, due to privacy legislation. | A CSS implemented in Queensland may partially address this issue. |
| Detailed research and information on any trends in risks factors relating to perpetrators and risk factors for organisational settings is currently limited internationally.   | A CSS implemented in Queensland may partially address this issue. |

### Option 2: Non-legislative approach to implementing the child safe standards (CRIS pages 42 and 79 and supplementary material 4)

**18. Do you support the Queensland Government using contractual/funding arrangements to require compliance with the CSS, supported by a policy framework, instead of legislation?**

YES  NO

*Why or why not?*

We support legislation as a way to mandate compliance with the CSS, rather than through contractual/funding arrangements. Some organisations that are proposed to be in scope do not necessarily have state government funding for their services or programs, so would not be captured by including CSS in contractual/funding arrangements.

**19. To what degree will this option contribute to the objectives for government action, i.e., to ensure the safety and wellbeing of children accessing services or facilities in Queensland institutions (see Part 2 – Objectives of government action)?**

This option would contribute to a high degree to the objectives for government action. However, as mentioned above, this option would not capture all organisations in scope, as not all of these organisations would have state government funding for their services.

**20. Do you consider there are additional potential impacts or benefits of this option?**

If this option was implemented, the benefit for the state government's objectives would be reduced.

**21. What support would organisations in scope of this option need to effectively implement the CSS?**

The same type of guidance, support and resources that would be developed if the CSS were mandated through legislation.

**22. What is the level of readiness in your organisation to implement option 2?**

*E.g. (1 year/ 6 months from ready to comply, need significant support, ready now)*

As stated, the Uniting Church in Australia Queensland Synod, UnitingCare Queensland and Wesley Mission Queensland all currently comply with the National Principles for Child Safe Organisations and/or the Royal Commission's 10 Child Safe Standards. However, we would still need 6 months to be able to review existing policies and procedures with any new requirements.

**23. Are there any other issues about this option you wish to raise for your sector/organisation?**

n/a

**Option 3(a) – Collaborative regulatory approach and Option 3 (b) – Co-regulatory approach (CRIS pages 42 and 81 and supplementary material 4)**  
**Legislative mandate to implement the CSS:**

**24. Do you support the Queensland Government legislating a system for mandatory compliance with the CSS? Why or why not?**

**YES**  **NO**

*Why or why not?*

We support legislation as a way to mandate compliance with the CSS. Some organisations that are proposed to be in scope do not necessarily have state government funding for their services, so would not be captured by including CSS in contractual/funding arrangements.

**25. Do you consider there are any additional potential impacts or benefits of a legislative approach?**

n/a

**26. Has your organisations already implemented measures that align with the CSS that may reduce the costs for compliance and/or the potential benefits from complying?**



*Current activities that align with CSS, including any analysis of how this may reduce costs or otherwise impact compliance*

The Uniting Church in Australia Queensland Synod, UnitingCare Queensland and Wesley Mission Queensland all currently comply with the National Principles for Child Safe Organisations and/or the Royal Commission’s 10 Child Safe Standards. However, we would still need 6 months to be able to review existing policies and procedures with any new requirements.

**How the CSS oversight body should work with existing bodies to reduce regulatory burden and duplication: Questions for organisations and sector regulators**

**27. If an independent CSS oversight body was established, which approach do you support:**

| Option   | Option 3 (a)<br>Existing sector regulators should work collaboratively with the CSS oversight body to maximise effectiveness of the scheme for their sectors, with the main regulation and enforcement of the CSS resting with the CSS oversight body. | Option 3 (b)<br>Existing sector regulators should have a formal role in regulating and enforcing compliance with the CSS, with potential powers and functions delegated to them in legislation. |
|--|--|---|
| <b>Support</b>   | <b>YES / NO</b>  | <b>YES / NO</b>   |
| <b>Barriers to this approach (Question 28)</b>   | Information sharing arrangements and removing duplication in regulation will need to be established between existing regulators and a new oversight body.  |   |
| <b>Costs / impacts for your organisation to comply under either option (Question 29)</b> | If duplication in regulation is removed, this should lower costs for organisations to comply with CSS.   |   |
| <b>Costs / impacts for existing sector regulators under either option (Question 30)</b>  | n/a  |   |

**31. Do you have suggestions as to how the CSS oversight body could collaborate (or co-regulate) with sector regulators, to streamline and support the operation of the CSS?**

The CSS oversight body could collaborate with sector regulators in information sharing, in order to perform data analysis of risks and trends in misconduct, and to remove duplication of compliance obligations for organisations.

**Oversight body working effectively with organisations to support CSS compliance:**

**32. How should the CSS oversight body work with organisations to support, monitor and oversee compliance with the CSS? Does this change based on factors such as existing**

**sector regulation and peak bodies, an organisation's size and resources, and the risk profiles of particular sectors and organisations?**

The CSS oversight body could work with organisations to provide training, education and guidance to help organisations comply with the child safe standards. This could be targeted to risk profiles of particular sectors and organisations. Organisations that do not need to comply with existing quality standards and practice standards for a particular sector/s should also be targeted.

**33. What sorts of powers and functions should the CSS oversight body have to be most effective in supporting CSS compliance? Are some powers and functions more important than others?**

We agree with the CSS oversight body having the powers and functions that are listed in the 2021 consultation report:

- request (and share) information;
- undertake audits;
- undertake own motion investigations;
- make recommendations;
- require or undertake public reporting; and
- undertake enforcement actions, including issuing breach or compliance notices, applying financial penalties and instigating criminal or civil proceedings or court orders for serious failures.

**34. What support would organisations need to effectively implement the CSS under option 3?**

Detailed guidance would be useful for organisations and sectors as a whole, on how best to apply the CSS.

**35. What is the level of readiness in your organisation to implement Options 3(a) or 3(b)?**

*E.g. (1 year/ 6 months from ready to comply, need significant support, ready now)*

The Uniting Church in Australia Queensland Synod, UnitingCare Queensland and Wesley Mission Queensland all currently comply with the National Principles for Child Safe Organisations and/or the Royal Commission's 10 Child Safe Standards. However, we would still need 6 months to be able to review existing policies and procedures with any new requirements.

**Driving cultural change and raising awareness in organisations and communities:**

**36. How can the CSS oversight body best help create cultural change to prioritise the safety and wellbeing of children and young people in organisations as well as the community?**

The CSS oversight body could best help create cultural change in organisations by providing evidence-based guidance on child safety risks for organisations. For cultural change within the community, an awareness-raising campaign could be undertaken to educate and inform the community around issues relevant to child safety in organisations, such as grooming by perpetrators.

**37. How should the CSS oversight body best support families and communities to build their child safe knowledge and help drive organisations to be child safe?**

Please see the answer to the previous question.

**Reportable Conduct Scheme**

**Option 1: Maintain the status quo (no action) (CRIS pages 58 and 89)**

**38. Do you support this option? Why or why not?**

YES  NO

*Why or why not?*

Maintaining the status quo would not allow for the analysis of risks and incidents across and within sectors and organisational settings. This work is critical in identifying further safeguards that organisations may need to implement to keep children and young people safe.

**39. What are the strengths and benefits of the current system?**

n/a

**40. What are the challenges of the current system?**

n/a

**Current impacts on your organisation**

**41. What are your current activities and related costs for preventing, detecting and responding to allegations of child abuse/maltreatment by staff? (If possible, please set out a breakdown of these costs, such as the costs for an activity like maintaining a complaints policy or conducting an investigation)**

| Current activity/obligations                 | Estimated cost to your organisation to conduct these activities |
|--|---|
| Complying with the National Principles       | n/a   |
| Complying with the Royal Commission's 10 CSS | n/a   |
|  |   |

**42. Do you consider the current requirements that apply to you/your organisation or sector, to keep children safe and report harm in organisations, are adequate? This includes, for example, the blue card, mandatory reporting and other measures listed on page 25.**

YES  NO

*Comments*

The current requirements in Queensland are not adequate. We believe the organisations that already comply with the National Principles and/or the Royal Commission's 10 CSS should be exempt from Queensland CSS, as the two sets of national CSS are adequate. Organisations that don't comply with these schemes should be required to follow the proposed CSS.

**Option 2: Nationally consistent reportable conduct scheme (direct Government regulation required) (CRIS pages 58 and 91 and Supplementary Material 5)**

**43. Do you support Option 2, to introduce a reportable conduct scheme for Queensland? Why or why not?**

YES  NO

*Why or why not?*

Yes, to identify trends in risks and misconduct across all organisations that will be required to comply, so that evidence-based guidance can be developed for organisations to keep children safe from harm.

**44. What are your views on the core elements of the reportable conduct scheme, as set out on pages 57-68? For example, do you consider that the following is appropriate or should be modified: scope of sectors; definition of reportable conduct; capturing cumulative harm; and including third party employers?**

| Examples of key features of RCS                           | Comments   |
|---|--|
| Definition of reportable conduct (pages 61-62)            | We agree with the definition, however detailed guidance for organisations will be required on thresholds for when conduct is to be reported, if qualifying words such as 'significant' are to be used. In addition, we believe that allegations made before commencement of the scheme should be required to be reported to the RCS oversight body. Otherwise, this type of 'red flag' will not be recorded by the oversight body. |
| Definition of employee (page 63)                          | n/a  |
| Functions and powers of the oversight body (pages 59-60)  | n/a  |
| Responsibilities of organisations under the RCS (page 61) | n/a  |
| Scope of sectors to be included (page 63-64)              | We believe that the scope of organisations to be included in the CSS scheme should align with the categories of regulated employment under the <i>Working with Children (Risk Management and Screening) Act 2000</i> . We recommend that Private Residential Services in Queensland should be included in the "Accommodation and residential services for children" category.  |
| Other   | n/a  |

**45. Do you expect the reportable conduct scheme to change your organisation or sector's culture, or individual employee behaviour, regarding responses to allegations of child abuse? Why or why not? Alternatively, if you have experience of a reportable conduct scheme in another jurisdiction/s, what changes in behaviour and culture have you observed with the introduction/presence of the reportable conduct scheme?**

The RCS may have the impact of highlighting the seriousness of child abuse across sectors, organisations, and the community.

**46. Have the potential impacts of a reportable conduct scheme been accurately captured? (Table 29, pages 92-93):**

YES  NO

Please also consider (and if applicable, as part of your experience of a reportable conduct scheme in other jurisdiction/s):

- a) If there are any other benefits to the reportable conduct scheme?
- b) What are the challenges that exist for you/your organisation or sector to comply with the reportable conduct scheme?
- c) How could organisations be supported to address these challenges?

|                                      |  |
|--------------------------------------|--|
| <b>Additional benefits of RCS</b>    |  |
| n/a                                  |  |
| <b>Challenges to comply with RCS</b> | <b>How to address these challenges</b> |
| n/a                                  |  |
|                                      |  |
|                                      |  |

**47. Has your organisations already implemented measures that align with the RCS that may reduce the costs for compliance and/or the potential benefits from complying?**

*(Similar to Q.41) Current activities that align with RCS, including any analysis of how this may reduce costs or otherwise impact compliance*

The Uniting Church in Australia Queensland Synod, UnitingCare Queensland and Wesley Mission Queensland all currently comply with the National Principles for Child Safe Organisations and/or the Royal Commission’s 10 Child Safe Standards.

## Part 8: Implementation and evaluation (page 108)

**48. Are there any factors specific to your organisation and/or sector that should be considered as part of implementation of an integrated child safe organisations scheme (RCS and CSS)?**

We submit that an exemption for the CSS should exist for organisations who already comply with the National Principles or the Royal Commission’s 10 CSS.

**49. Do you support an approach that staggers the introduction of CSS and RCS (such that CSS is introduced ahead of the RCS) or should the CSS and RCS be introduced to sectors at the same time? Why or why not?**

**Staggered CSS and RCS (CSS first, followed by RCS)**

**Simultaneous CSS and RCS**

*Why do you support this option?*

A staggered introduction of the CSS and RCS is our preferred option, as this allows for organisations to focus on preparing or revising policies, procedures and training for one scheme

first, before then revising policies, procedures and training for the second scheme. As stated in the CRIS, the Royal Commission recommended a staged approach for introducing CSS and RCS to sectors to assist both government and organisations to prepare.

**50. Do you support a phased approach to introducing sectors to the CSS and RCS, or should the schemes apply to all organisations in scope at the same time? Why or why not?**

**CSS phased introduction**                      **OR**     **CSS apply to all organisations in scope at same time**

**AND**

**RCS phased introduction**    **OR**     **RCS apply to all organisations at the same time**

*Why do you support this option?*

Phased introduction of the CSS and RCS is our preferred option for new regulatory schemes, as this allows for preparation by organisations to implement the schemes. Additionally, the state government may be able to identify any flaws in the operation of the proposed schemes as they are phased in, and address these before full implementation is required.

**51. Do you have suggestions for supports or measures that could help with successful implementation of the CSS and RCS in Queensland and/or which might minimise any unintended outcomes?**

*Implementation of Child Safe Standards*

The state government should provide evidence-based, detailed guidance on addressing child safety risks in organisations. An awareness-raising campaign in the community should also be undertaken to educate and inform the community about the existence of the scheme.

*Implementation of Reportable Conduct Scheme*

Detailed guidance for organisations on the interaction of the proposed scheme with existing reporting schemes may be required.