



**Submission to the Royal Commission into Institutional Responses to Child
Sexual Abuse Consultation Paper on Records and Recordkeeping practices**

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Submission to the Royal Commission into Institutional Responses to Child Sexual Abuse Consultation Paper on Records and Recordkeeping practices

The Centre for Excellence in Child and Family Welfare (the Centre) welcomes the opportunity to submit a response to the Royal Commission into Institutional Responses to Child Sexual Abuse Consultation Paper on Records and Recordkeeping practices.

About the Centre for Excellence in Child and Family Welfare

The Centre for Excellence in Child and Family Welfare ('the Centre') is a peak body established to improve the lives of vulnerable children and their families in Victoria. The Centre and its hundreds of members represent early childhood, child, youth and family support services, and out of home care services, including kinship care, foster care and residential care and services providing for children moving on from care. The Centre works with these organisations and those employed in child and family services to strengthen the quality and capacity of services. It does this through workforce development and learning, policy development research and advocacy for children and families.

Royal Commission into Institutional Responses to Child Sexual Abuse

The Centre continues to be committed to supporting the work of the Royal Commission into Institutional Responses to Child Sexual Abuse ('the Royal Commission'). The Centre has previously made the following submissions to the Royal Commission:

- Issues Paper 1: Working with Children Check, August 2013;
- Issues Paper 3: Child Safe Institutions, October 2013;
- Issues Paper 4: Preventing Sexual Abuse of Children in Out of Home Care, November 2013;
- Issues Paper 5: Civil Litigation, March 2014;
- Issues Paper 6: Redress Schemes, June 2014;
- Issues Paper 7: Statutory Victims of Crime Compensation Schemes, June 2014;
- Consultation Paper: Redress and Civil Litigation, March 2015;
- Issues Paper 9: Addressing the Risk of Child Sexual Abuse in Primary and Secondary Schools, September 2015.
- Consultation Paper – Institutional Responses to Child Sexual Abuse in Out of Home Care
- Issues Paper 10 - Advocacy and Support and Therapeutic Treatment Services
- Consultation paper: Best practice principles in responding to complaints of child sexual abuse in institutional contexts

Submission to the Royal Commission into Institutional Responses to Child Sexual Abuse Consultation Paper on Records and Recordkeeping practices

This paper is a written submission on the Royal Commission into Institutional Responses to Child Sexual Abuse Consultation Paper on Records and Recordkeeping practices ('Consultation Paper') which is intended to complement the Centre's previous written submissions, as set out above.

The Centre applauds the Consultation Paper's acknowledgement of the difficulties faced by survivors of abuse when seeking access to records. The Centre's approach in written submissions to the Royal Commission is to advocate for the safety of yesterday's, today's and tomorrow's children.

This submission has been prepared with the assistance of Anglicare Victoria, VACCA and Wesley Mission Victoria.

The Six Principles identified by the Royal Commission

The Royal Commission has developed 5 core principles in relation to records and record keeping as follows:

- 1) Creating and keeping accurate records is in the best interests of children
- 2) Accurate Records must be created about all decisions and incidents affecting child protection.
- 3) Records relevant to child sexual abuse must be appropriately maintained
- 4) Records Relevant to child sexual abuse must only be disposed of subject to law or policy
- 5) Individuals' rights to access and amend records about them can only be restricted in accordance with law.

The Royal Commission has also sought comment about whether there should be a sixth principle of enforcement.

The Centre supports the 5 core principles proposed by the Royal Commission as reflecting current best practice. A more detailed response to each principle and the accompanying questions follows. The Centre considers that an additional enforcement regime may be unnecessary in Victoria in relation to records and record keeping as the current Victorian legislative framework, service and funding agreements and Child Safe Standards are sufficiently robust. However this may need to be considered in other states that do not have similar provisions. There should be nationally consistent expectations of organisations that provide services or are in contact with children for all Australian children.

All forms of abuse

While the Centre understands the terms of reference of the Royal Commission is limited to child sexual abuse, the Centre advocates that the recommendations made in relation to accessing records and recordkeeping should not be limited to those sexually abused as children in institutional care, but should be accessible to all survivors of child abuse in institutional settings. The impact of the difficulties many people have faced when trying to access their records of time in institutional care have been significant and not limited to survivors of child sexual abuse.

The Importance of records and recordkeeping practices

The Consultation Paper identifies the main issues and concerns facing victims of abuse when attempting to access their records. All too often victims of institutional abuse have encountered difficulties when attempting to access records about their abuse, time spent in institutions and to locate family. In some instances, records were not created, records are incomplete, records have been improperly stored and indexed, records have been lost, destroyed or information redacted. These issues have been compounded by delays and difficulties experienced in accessing these records¹.

Records can provide victims of abuse much needed documentary evidence of the abuse suffered by them. They can also offer confirmation and validation of the time spent in institutional care. In the absence of parents and other family supports, records may be the only source of family information, including medical history, available to the person. An absence of records can serve to negate or invalidate a person's lived experience and compound the trauma already suffered. Access to records and good record keeping practices is not only an issue for survivors of past institutional abuse, but is relevant to children and young people currently involved in the child protection system or receiving services from organisations that have a high level of responsibility for children.

Children are exposed to a wide variety of organisations on a daily basis. Early childhood centres, kindergartens, schools, extra-curricular activity providers, faith based organisations and others all provide services to children. Some will have a higher level of supervision and care for children than others, but all have an obligation to ensure that children are protected from all forms of abuse. Good record keeping practices are an essential tool to assist.

For children in out of home care, good record keeping is essential. It should serve as the 'memory bank' for each child, documenting milestones, medical and dental records, family history and the child's path through the out of home care system. Good records help the child to make sense of his or her own personal history.

¹ Ombudsman of Victoria, 'Own motion investigation into the management and storage of ward records by the Department of Human Services' 29 February 2012

*For many care-leavers, particularly those without family contacts, out of home care records are the main resource for remembering and understanding their childhoods and family history. This knowledge is fundamental for people seeking to explore their identity. Records have the potential to allow the out-of-home care system to support identity work for clients long after they leave formal care arrangements”.*²

The Centre recognises the importance of records and recordkeeping and periodically offers professional development training about the creation of documentation and case notes and relevant legislation.

Records and Redress

Furthermore accessing accurate records is an important component for victims of abuse when seeking redress. As stated by the Centre in its submission to Issues Paper 6, Redress Schemes;

*An important component of rehabilitation includes the ability for victims to access unredacted personal records and files from Governments and institutions. As such, there needs to be policies on recordkeeping and quality recording. Records contain important information on family, siblings, reason for being placed in care, past carers that may be helpful in the healing process but also in locating family.*³

The Commission, in the Redress and Civil Litigation Report recommends that institutions should offer and provide a direct personal response to survivors as part of redress. It notes that organisations assisting survivors to gain access to their records is ‘one of the forms of direct personal response that institutions can offer and provide and that is likely to be of assistance to some survivors’⁴. Funded supported assistance to access records should be available to all victims of institutional abuse.

Funding and Resources

A consistent theme when seeking to improve the creation, retention and access to records is the impact on staffing time and resources. Some organisations are better able to absorb some of the costs incurred in improving their record keeping practices. For example, Wesley Mission Victoria, with the support of Uniting Care agencies, has recently allocated internal funds to employ a Heritage Coordinator. Smaller agencies may not have the necessary resources. A commitment to improving record keeping and management across

² Kertesz, M, ‘100+ points of identity- gathering young people’s history for the future’, *Final Report, March 2011*, 1.

³The Centre for Excellence in Child and Family Welfare, Issues Paper 6 - Redress Schemes, 9.

⁴ Royal Commission into Institutional Child Sexual Abuse, 2015, ‘Redress and Civil Litigation Report’, Commonwealth of Australia, 157.

all government and non-government organisations must be supported by adequate funding. In addition the process of accessing records can be traumatic. Adequate funding must be allocated to enable all organisations to release records in a supported and therapeutic manner.

Principle One: Creating and keeping accurate records is in the best interests of children

Article One of the UN Convention on the Rights of the Child clearly places the best interests of the child as fundamental:

In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration⁵.

The Centre supports an approach to recordkeeping and management that places the best interests of the child at its centre. Records should be thorough, easy to understand, easy to locate and access.

All organisations that provide services or care for children must have the best interests of the child at the centre of all that they do. Good record keeping should underpin and reflect this best interest approach. Different types of organisations will have different record keeping obligations, depending on their functions, but all organisations should be able to identify when and how to create, manage and release records according to best practice.

1) How institutions can build and foster cultures that promote and recognise good records and record keeping as being in the best interests of the child.

Recognising and prioritising the importance of records will only happen if there is a cultural change supported across all organisations to create a comprehensive child safe strategy. The importance of records needs to be recognised across all levels of an organisation from the board and executive management to all staff and volunteers.

2) What training staff and volunteers in institutions need to help them understand the importance and significance of good records and recordkeeping practices

Recording requirements will differ depending upon the services provided by the organisation. The recordkeeping requirements of an organisation providing out of home care will be different to a local volunteer run sporting club. However, all organisations should train staff to properly record any allegations of abuse or concerning behaviours and responses and reporting of allegations to statutory authorities. All organisations should maintain accurate records of all staff and volunteers as well as children who access their services.

⁵ UNCRC 1989, 'Convention on the Rights of the Child'

3) What role governments may play in promoting good institutional records and recordkeeping

The Victorian Government has introduced mandatory Child Safe Standards to improve the way organisations that provide services to create and maintain child safe environments. There are seven child safe standards. Standard 5 specifically deals with the processes for responding to and reporting suspected child abuse. Organisations that successfully implement this standard will ensure that allegations of abuse and safety concerns are appropriately recorded and stored securely to protect privacy.⁶ They will be monitored and enforced by the Victorian Commissioner for Children and Young People. The Victorian Government has provided the legal framework but also some resources to assist organisations to meet these requirements. This responsibility has now been given to the Victorian Commission for Children and Young People.

4) What role children, parents and others may play in helping institutions develop, share and monitor their record keeping practices.

Victoria's Child Safe Standard 6 outlines strategies for organisations to promote the participation of children. An organisation that successfully implements this standard will be one where 'children feel empowered to contribute to the organisation's understanding and treatment of child safety'.⁷

Children and their parents should be formally notified of their right to access their records and the process to do so. Assistance should be provided to children and adults should they wish to access these records in the event they contain distressing information. Children and families should be provided with any reports written about them, including child protection reports, in a supported way that allows for their input.

Principle Two: Accurate Records must be created about all decisions and incidents affecting child protection.

While good record keeping is important in and of itself, it must be reinforced with a strong organisational culture which is focused on the best interests of the child. Where organisational culture is open and aware, records are useful means of recording both weak signals and stronger concerns about a child's wellbeing and safety, prompting a timely response. In the absence of such a culture, record keeping is unlikely to reflect signals of concern.

5) What records relating to child sexual abuse should be created by institutions that care for or provide services to children and what language should be used

⁶ The Victorian Government, 2015, 'An overview of the Victorian child safe standards', 22.

⁷ Ibid, 26.

All too often records and recordkeeping are seen to be secondary to the administrative requirements placed upon professionals engaging with children. This is compounded by the time pressures and crisis driven nature confronting many front line workers. Professionals working within this system must balance the competing needs of active case management, court deadlines, finding and supporting suitable care options for children with maintaining accurate and considered case notes.

Clear, consistent and as close to contemporaneous record keeping is best practice. Records should be written with the knowledge that they may be read at a later date by the child and his or her family. They must always use respectful, culturally appropriate and non-derogatory language. Records should be maintained to the highest standard and include all relevant information. Records need to be seen as central to good case management practice and not as an afterthought or onerous requirement. Good records often reflect good practice.

Records should not only include adverse or negative information relating to the abuse suffered by the child but concerted efforts should be made to include positive information about the child and his or her strengths and interests.

6) What training or assistance institutions and their staff or volunteers might need to enable them to create accurate records relevant to child sexual abuse

Accurate record keeping is to a large extent dependent on well trained and qualified staff. Records are only as good as the information collated. Staff must have appropriate training to recognise instances of suspected grooming, inappropriate behaviour, breaches of codes of conduct and all forms of child abuse including child to child abuse.

Training in how to write and maintain accurate and respectful case notes should be mandatory for all practitioners working with children. Case notes should be written with the knowledge that the child has the right to, and may seek to access the records written about them in the future. Respectful and non-judgemental language must always be used. All attempts should be made to ensure that the information recorded is accurate and complete and that there are no inconsistencies. The practice of writing records should be part of tertiary training for people seeking to work with children and families. Good practice in writing file notes should be supported and encouraged by regular supervision and file reviews. Files should be regularly audited by senior management to ensure consistency across an organisation. Staff should also have the capacity to review their own files and case notes, to include reflective analysis about a child and to highlight positive observations about a child. One way to ensure that staff maintain a best interests approach to creating file notes is to provide practice and policy advice on minimum recording requirements. Fields could include positive observations about the child. These will serve as prompts and focus attention back onto the best interests of the child.

7) How children's views and experiences can be accurately reflected in records about their childhoods and decisions affecting them

Best practice when creating case notes is to include the views of the child and his or her parents, carers and professional network. This could take the form of a right of response or a more collaborative approach where the views of the child and parents are actively sought. Anglicare Victoria's St Luke's Region has adopted a client centred, co-constructed recordkeeping practice, when appropriate, for its child and family services program. This encourages an open information flow between the case worker and the child and the child's voice is included.

In Victoria, children in out of home care participate in the Looking After Children process. This occurs biannually for children under school age and annually for older children. The process should take place over several weeks and involves the child's care team. This team includes the child's case worker, carer and other professionals, the child where appropriate and the child's parents. It also involves observations about and discussions with the child if they are old enough. The purpose is to track the child's developmental progress against seven life areas: health, emotional and behavioural development, education, family and social relationships, identity, social presentation and self-care skills. The child should be actively involved in this process. The purpose is to ensure that children's developmental needs and associated tasks are assigned to the care team.

Creating and maintaining a 'Life Book' is also part of the process. A 'Life Book' is a document which tells the child's life story. It includes photographs, mementos and information about a child before entering care and the story of their time in care.

8) How institutional records can be monitored to ensure they are accurate

Governments can provide guidance to funded organisations directly as part of service and funding agreements. Clear expectations about records and record keeping can be agreed to as part of contractual obligations. Inspection of records and recordkeeping practices should form part of the regular auditing process.

9) Whether there may be unintended consequences arising from requiring institutions to create accurate and detailed records relating to child sexual abuse (for example, creating records that may be discoverable by other parties in legal proceedings, potentially to the detriment or distress of individuals discussed in those records).

There may be adverse impacts on an individual if a file concerning them is discoverable as part of legal proceedings. However that should not prevent or limit the creation of accurate and child focused records in the first instance. Organisations can take steps to mitigate any distress which may be caused by offering support and assistance to the individual. Organisations could also, at the time the young person leaves care, provide information

about their own rights to access their file, and the organisation's legal requirements to comply with future court orders and details of organisations that assist in accessing records.

Principle Three: Records relevant to child sexual abuse must be appropriately maintained

10) What the resourcing implications of requiring institutions that hold large volumes of unindexed historical records to index their files are

Records relevant to child sexual and other forms of abuse must be appropriately maintained. Some organisations such as Anglicare Victoria, MacKillop Family Services, Berry Street, and Wesley Mission Victoria have established dedicated heritage services. Child and Family Services Ballarat have also established a Legacy and Research Centre. This has entailed employing specialist staff and allocating appropriate resources. Smaller organisations may not be in a position to adequately fund these types of services. Heritage services, including supported release of records should be correctly costed and funded.

11) Whether and how indexing of historical records should be prioritized (for example, prioritising records of elderly care leavers, or de-prioritizing files of over 100 years of age)

The overriding principle is that all individuals have the right to access their own records in a timely manner. However the reality facing organisations is that often their records are still not appropriately archived. In the absence of adequate funding to remedy this situation priority should be given to elderly care leavers and those suffering from ill health. Priority should also be given to individuals who were adopted or who were in out of home care.

Another group of people who are seeking to access files are the children and grandchildren of Forgotten Australians and the Stolen Generation. Whilst they themselves are not the subject of the records, the intergenerational trauma which may be experienced by family could be assisted by a timely supported release of these records. All children, their families and adults have a right to timely access of their records by organisations.

12) How records relevant to child sexual abuse should be indexed to allow them to be easily located, retrieved and associated

A consistent approach to indexing files should be used across all government funded organisations. One way to index files is by birth date. However many survivors of institutional abuse do not have an accurate birth certificate, this is particularly the case for the Stolen Generation. A robust search engine needs to be developed to include birthdate and multiple spellings of names. Often siblings files were grouped together, with all relevant information held on one sibling file with other files holding limited information. Or, conversely sibling files have not been stored together. These types of file grouping should be cross referenced. Organisations should create a register of all search requests and notify

record seekers if files or other information relating to that search request is discovered at a subsequent date.

13) What should happen to the records of institutions that close, or change ownership or function before the expiry of any records retention period.

In the event that an organisation closes without merging with another organisation, all records could be returned to the funding body. The funding body could continue to manage these records.

Principle Four: Records Relevant to child sexual abuse must only be disposed of subject to law or policy

Policies and procedures regarding the retention and destruction of records should be open and transparent. Decisions relating to the disposal of records should always have the best interests of the subject of the record as the paramount consideration and not that of the organisation or their reputation⁸.

14) Whether and how the views of individuals discussed within institutional records could be canvassed and represented in decisions concerning disposal

15) How long records relevant to child sexual assault should be retained, and under what (if any) circumstances should they be destroyed

The starting point for an institution should be to retain institutional records. Survivors of abuse or people who have been the subject of child protection intervention, however, may seek to have their records destroyed. Organisations holding these records must consider the views of the individuals concerned. However, as has been the case with the children and grandchildren of Forgotten Australians, it may be important for decedents to be able to access these files.

Victorian organisations must adhere to their statutory obligations pursuant to section 12 of the Public Records Act 1973 which provides for the Retention & Disposal Authority for Records of Child Protection & Family Services Functions. Records relating to out of home care and category one incidents of sexual or physical abuse must be maintained indefinitely.

Institutional records relating to child sexual or other abuse, out of home care, or adoption should be maintained indefinitely. Other forms of records should be held subject to current legislative requirements.

16) What implications abolition of statutory limitation periods for civil claims by victims and survivors of child sexual abuse may have for record retention practices

⁸ See Family and Community Development Committee, 2013 “Betrayal of Trust, inquiry into the handling of child abuse by religious and other non-government organisations’

Organisations that have established good record keeping practices will not be impacted by the abolition of statutory limitation periods for civil claims. Other organisations will need financial assistance to properly identify and maintain these records.

17) Whether the records of all institutions that care for or provide services to children should be subject to mandatory retention periods, what impact this may have, and how those impacts can be mitigated

18) Whether institutions should maintain registers of what records they destroy, when and upon what authority

It would be onerous to expect all organisations which provide services to children to keep all records indefinitely. The minimum requirement should be that records listing the names of staff and volunteers with the service as well as the names of the children who access the service and the dates of engagement should be retained indefinitely. All records relating to allegations of any form of abuse should also be retained indefinitely. Institutions should maintain registers of what records they destroy, when and upon what authority. Institutions that have a higher responsibility for children's care, supervision and wellbeing should be held to a higher standard and must comply with statutory requirements.

19) How the Access Principles for Records Holders and Best Practice Guidelines in providing access to records have been applied in practice

20) Whether they have resulted in simplified and more open access processes

21) Whether and how they might be adapted to apply to access to the records of all the institutions within our terms of reference

The Access Principles for Records Holders and Best Practice Guidelines have been very helpful when applied in practice. Anglicare Victoria advises that they provide clarity and consistency when processing requests to access records as well as providing clear guidance when considering redactions. They are also a helpful tool when used in staff training. The overarching principles in the guidelines would be helpful to all institutions that provide services to children.

Principle 5: Individuals' rights to access and amend records about them can only be restricted in accordance with law.

Organisations must have a child centred and best interests approach when responding to an individual's request for access to records written about them. The starting point should always be one of full disclosure. Records should be provided free of charge. Records should be maintained in such a way that a general request for a file is sufficient and multiple and specific applications are unnecessary. Support should be provided to individuals accessing their files, including counselling services. The Find and Connect Service is a good example of the type of support that is beneficial.

22) In relation to inconsistent laws and practice, whether the Privacy Act 1988 (Cth) should be amended so the Australian Privacy Principles relevant to access and amendment apply to all private institutions that care for or provide services to children, or, alternatively, how small private institutions that care for or provide services to children can be encouraged to 'opt-in' to the Australian Privacy Principles scheme.

Inconsistent laws and practices across states and institutions should be minimised and the Privacy Act 1988 (Cth) should be amended so the Australian Privacy Principles apply to all private institutions that care for or provide services to children. The current situation where small businesses and not for profit organisations with annual turnovers of less than \$3,000,000 are not covered by the Australian Privacy Principles is unfair. All organisations providing services to children, irrespective of size or funding sources, should operate in a child safe environment with appropriate policies and procedures including access to records.

23) In relation to fees and charges, whether requests to access records created by institutions about children with whom they have engaged should be free of fees and charges, and, if so, what resourcing implications this may raise for record holders.

24) In relation to access grants, what steps institutions should take to ensure that individuals have appropriate support when reading and interpreting records with potentially distressing content

Records should be provided free of charge. There should be no processing or administrative fees. All possible assistance should be given by the organisation to the individual to assist with the process. Consideration should be given to the means by which a file is given to a person. Preferably the file should be provided to the person in a private and comfortable space. The MacKillop and Child & Family Services Ballarat Heritage Centres provide a good example of a supportive physical environment in which to release records.

The content of records may be distressing to the individual. The records may include information about familial, child to child or sibling abuse or information about historical abuse within the family. Records may also be distressing in the absence of substantive information, the use of disrespectful language or that they are incomplete. Records should always be released in a sensitive and supportive way with the offer of appropriate support services, including counselling.

The Royal Commission has highlighted the issue of access to records as forming part of the recommended redress scheme. However this scheme is limited to survivors of sexual abuse. The impact on individuals attempting to access records is not limited to survivors of sexual abuse but is relevant to all individuals seeking to access their records. Therefore access to counselling and other support services when accessing records should be available

to survivors of institutional abuse by organisations, people who have been the subject of a state sanctioned adoption and people who were the subject of child protection intervention.

25) In relation to redactions, whether nationally consistent standards for redaction should be established; and what those standards should be

26) In relation to refusal of access and amendment, whether existing exceptions are appropriate in the context of records relevant to child sexual abuse

27) In relation to third party privacy, how public and private institutions can be better educated about the proper application of third party privacy exceptions.

The Access Principles for Records Holders and Best Practice Guidelines provide a useful guide to assist when determining the issue of redactions and third party privacy exceptions.

A decision to redact segments of records should be accompanied by an easy to understand explanation of the grounds relied upon by the decision maker. This could be made in person by an appropriately trained professional or in the case of people who prefer to access their records remotely by way of a detailed covering letter. In any event, a written explanation for the redaction could always be provided.

All people should have the right to formally respond to records written about them by organisations providing services to children. A formal response could include a statement of alternate facts or a 'right of reply'. It could also include annotated notes of the records. Consideration may be given to the impact providing the records may have on the individual's mental health. In some cases the institution may determine that releasing the record may have a detrimental effect on the person's mental health. In these cases consideration should be given to the most appropriate way to release the information so as to minimise any adverse impact on the person.

28) Whether a sixth principle directed at enforcing the initial five principles is required

29) Whether it would be necessary or appropriate to adopt a two tiered approach to the enforcement of record keeping practices, whereby certain institutions (such as OOC service providers and schools) are held to a higher standard than other (such as local sports clubs).

In Victoria organisations that are funded and regulated by government enter into service agreements. These agreements include provisions and expectations for record keeping. Organisations that receive minimal government funding and regulation but provide services and have contact with children are covered by the Victorian Child Safe Standards and the soon to be introduced laws on compliance and monitoring. These impose an obligation on all organisations that provide services to children to keep good records.

The Centre considers that an additional enforcement regime may be unnecessary in Victoria in relation to records and record keeping as the current Victorian legislative framework, and service and funding agreements are sufficiently robust. However this may need to be considered in other states that do not have similar provisions. There should be nationally consistent expectations of organisations that provide services or are in contact with children for all Australian children.

30) Whether a records advocacy service would be useful for victims and survivors of child sexual abuse in institutional contexts

31) What powers, functions and responsibilities a records advocacy service should have

32) Whether there are existing bodies or agencies that may be suited to delivering records and advocacy services.

The Open Place service operated by Berry Street in Victoria is a records advocacy service for Forgotten Australians. The Centre supports the work currently undertaken by Open Place and would support the service to be extended to remove the eligibility criteria and to be open to all care leavers. The Link-Up service operated by VACCA provides a culturally appropriate service for Aboriginal care leavers seeking to access their records. However there is an extensive waitlist to access the service. The Centre recommends that the existing records advocacy services be supported with appropriate funding.

Conclusion

The Centre supports the proposed principles highlighted by the Royal Commission. All people who have accessed services provided by governments and organisations as a child should have the right to access records about them. Organisations providing services to children need to operate in a best interests' culture that promotes child safety. Good record keeping practices are an essential component of a child safe organisation. Governments must ensure that organisations are resourced with a legal framework, service and funding agreements, policy and practice frameworks, and resources to be able to meet expectations of good record keeping practice at all stages of the record continuum.