



Moving the system from crisis to early help: connecting children, young people and families to the right support at the right time

Access System Redesign discussion paper

Their Futures Matter

March 2019

SUBMISSION

Following are the Benevolent Society's comments on the Access System Design discussion paper.

The Benevolent Society notes the discussion paper breaks little new ground. Whilst we welcome opportunities for genuine input into system reform, the discussion paper is a reiteration of past consultations and articulates few new reform ideas or concepts. We are particularly interested in the questions of how we move from concept to practice.

The Benevolent Society has responded to the questions we feel we can most add value and have applied our practice and service design expertise to the task. We have included examples of practice excellence that we think illustrate the kind of reform outcomes the paper is seeking to canvass.

The Benevolent Society feels that whilst the Department of Family and Community Service (FACS) has undertaken rolling consultation on various aspects of Their Futures Matter and its broader reform agenda, there is to date limited public information to demonstrate how those consultations are result in changes in policy or improvements in outcomes for children or their families.

As a non-government organisation (NGO) we believe that a genuine partnership between our two sectors is a prerequisite for any system redesign. Unfortunately, coordinated service delivery, information sharing and a seat at the decision making table, which have been articulated goals in this policy space for many years remains a major part of the unfinished business of child protection reform and one insufficiently addressed in the discussion paper.

The NSW Government needs to make good on its rhetoric about system reform and move on from pilot programs and selective investment in bespoke programs. It is now time for the Government to deliver a long term investment and implementation plan that completes the redesign and reform of the NSW child protection system so that it can respond early and effectively to the needs of children and their families.

The Benevolent Society makes the following comments in good faith, recognising that it has made similar or the same comments in other forums and through other processes.

Principles

The Benevolent Society agrees with the first three principles, which are the standard, agreed baseline for all work with children.

Design Principle 4 – Governance and accountability mechanisms across a multi –agency system

The Benevolent Society believes that the principle is inadequate and fails to acknowledge the increasing role of the NGO sector in the child protection system. Any governance structure must include representatives with operational expertise who can inform the implementation implications of policy making.

The principle is silent on decision-making, knowledge, information and data sharing, and is an inadequate representation of the current system's operations, which increasingly relies on NGO's assuming the major service delivery role and carrying the risk.

Design Principle 5 – Building trust in the system through an ethical approach

The Benevolent Society believes the principle needs to articulate a pathway to shared decision making with the NGO sector. The current system does not promote or enable trusting relationships between Government and NGO service providers. The lack of clarity around information sharing and decision-making leaves service providers operating at arms-length, rather than as equal partners who can make informed decisions.

2.1 Understanding the drivers of vulnerability

The Benevolent Society agrees with the themes and issues outlined in 2.1. They represent the long held views of practitioners, policy makers, researchers and academics.

What continues to be absent, despite being raised repeatedly by those same informed stakeholders, is the need for those drivers to be dealt with in a coordinated and interconnected manner and for service providers to be at the table when decisions are taking place. Despite acknowledging there may be multiple drivers of vulnerability, the system continues to respond to each issue through separate and distinct systems that do not interact openly and with trust, with NGO service providers who deliver the majority of services in the NSW child protection system.

2.2 Engaging with children and families earlier to bring about change

The Benevolent Society believes the need for early identification and intervention for families and children with known risk factors and vulnerabilities is well established and is consistent with those listed in 2.2. However, if an early intervention response is reliant on reporting from mandatory reporters then the response will almost certainly happen too late.

A key issue for The Benevolent Society is the lack of transparency from the Department around non-ROSH reports. NGOs remain in the dark about what happens to non-ROSH reports, including what assessment process is undertaken, how decisions are made about further action or referral and where or how the reports are used. The NGO sector does not have access to the non-ROSH data, or the decision making process that is made at FACS around the system response. This data is not publicly available and there is no visibility as to how it is managed.

Non-ROSH reports (and ROSH reports that are not allocated or closed due to competing priorities) would presumably be an early indicator of potential vulnerability and risk for use by services to inform an early intervention strategy for family engagement. They are a valuable piece of the early intervention and prevention response that are unavailable to NGOs already delivering services in relevant localities and with particular families.

The collection of wellbeing data by NGOs under TFM is another aspect of the system that remains invisible to service providers. Whilst NGO's can see the data as its collected on individual clients, we do not see the broader aggregated data that paints the full picture of the impact of service delivery.

FACS has not articulated to the sector how this wellbeing data, which forms the base of any early intervention response, if this data is going to be shared with the service sector so it can be used to inform service planning decisions.

2.3 Integrated, multi-agency responses are critical to address complex needs

Systems on their own do not necessarily enable a multi system response. In the Benevolent Society's experience, it is the relationships that have been built between agencies and services that have the greatest impact on enabling a coordinated response.

In a commissioning based service model where the commissioning agency has a command and control response to relationships, multi-agency responses are limited by the information that is able or is willing to be shared.

The Benevolent Society agrees that siloed service delivery is not effective or desirable. The present system is characterised by individual government agency silos, NGOs silos generated by the competitive nature of funding arrangements and a lack of collaboration between the two sectors. All these circumstances continue to create resistance to information sharing and service coordination that would improve the operation of the system.

In the Benevolent Society's experience multi agency responses can be further impacted by conflicting district boundaries and the lack of funding flexibility, or ability for funding to follow a client from district to district. This is particularly apparent and problematic for transient or homeless clients who find their service, and particularly the staff who they have built a trusting relationship with, are unable to continue to provide a service to them when they have changed address and therefore government agency district.

A further barrier can be the considerable turnover and mobility of FACS staff, and the NGO workforce which impedes the building of relationships across agencies and sectors and which has a direct impact on services and client outcomes.

The Benevolent Society also believes that the lack of consistent assessment tools and a common language to talk across services and government agencies about client requirements and service responses is a further impediment to coordinated multi agency and sector responses.

Whilst there are examples of common tools in use for assessment of particular risks (e.g., the Domestic Violence Safety Assessment Tool [DVSAT]), it is not a consistent feature of the child protection system. Common tools and standardised training in their application can help build trust between agencies and the sector that the assessment of need is correct. This can then help prevent unnecessary delays for NGOs who are often required by FACS to seek additional assessments from government recognised authorities because the NGO's expertise is not properly understood or accepted.

2.4 Socio-ecological approaches to supporting child and family wellbeing

The Benevolent Society supports a socio-ecological approach to its policy and practice. The Benevolent Society's Resilience Practice Framework is premised on a socio-ecological approach and has been designed to assist our practitioners to undertake comprehensive family assessments of risk, vulnerabilities and strengths that impact upon children, individuals and families. The Framework and suite of practice tools (Assessment and Outcome Tools) supports decision making in case management and the selection of resilience practices known to achieve positive outcomes for children, individuals and families.

The Resilience Assessment and Outcomes Tools provide a structured approach to assessment, planning, intervention and reviewing outcomes, and has been used by our practitioners for the past five years.

The Benevolent Society operates a number of integrated Early Years Centres (EYCs) in Queensland which provide a successful model of universal, early intervention soft entry points for children and families. EYCs are one-stop-shops or service hubs supporting the health, development, wellbeing and safety of families who have young children aged up to eight years. The centres employ a multidisciplinary staff who offer a range of universal and targeted early child development and support, maternity and child health services, home visiting, targeted family support, and long day care and kindergarten.

EYCs are located in socio-economically disadvantaged areas (according to the SEIFA index) where higher numbers of children who are developmentally vulnerable on one or more domains of the Australian Early Development Census live. EYC's work in partnership with other non-government service providers, Aboriginal and Torres Strait Islander community controlled organisations and the Queensland Government.

Acacia Ridge and Beaudesert EYCs

There are two Benevolent Society EYCs that are co-located with long day care and kindergarten services. These early childhood services known as the Team Around The Child (TAC) provide a pathway referral to our early years hub.

Staff or parent identified concerns are referred to a TAC meeting attended by parents, teachers and any person who is involved in the child's life. This could include but is not limited to the child and family practitioner, child health nurse, speech therapist, occupational therapist, psychologist, teachers from the school the child will attend, foster carer or caseworkers from foster care. The TAC meeting is managed in a conversational manner with support for parents to make the decisions about their child, based on all of the attendees' information and knowledge.

Parents are encouraged to talk about their family and their child, identify abilities, challenges, and any supports that may already be in place. The meeting identifies any needs and support ideas that can be implemented for the family to achieve their goals. It is important that everyone present is able to share his or her experience and expertise to finalise an agreed plan that will support the child holistically.

Every meeting is minuted and every child who is involved in the TAC process has an Individual Developmental Plan (IDP) for use by staff and teachers to make sure they are meeting the child's needs. The IDP is incorporated into the centre's program.

TAC meetings are held every term until the child moves on. A review process provides parents with the opportunity to review the IDP, discuss progress, plan for current needs and any additional supports that may be needed and amend the plan as needed.

The goal is to work with parents and significant others, to facilitate the child's learning, at home and at school and to achieve a collaborative relationships where parents, teachers, child and family practitioners work together to support the child. The TAC process demonstrates the Benevolent Society's integrated early childhood approach and creates a child focused wrap-around service for families who attend our early learning services.

Volunteer Family Connect (VFC)

The VFC program is another useful example of a socio-ecological approaches to supporting child and family wellbeing which bridges the connection between informal assistance and the formal family and children's service sector.

VFC is a community-driven, research-based home-visiting program that mobilises volunteers to provide support for parents of young children who are isolated or feeling overwhelmed by their parenting role. This best-practice program was developed by a joint alliance between leading nongovernment organisations: The Benevolent Society, Karitane and Save the Children Australia in collaboration with University research partners.

VFC draws on research evidence alongside the collective expertise and practice wisdom of the consortium to form a comprehensive program of support than can be implemented with high levels of quality and fidelity in diverse community contexts.

VFC is for families of young children (0-5) who experience isolation, report a lack of confidence in their parenting skills or have difficulty accessing mainstream services. It is a preventative program for parents who do not yet require an intensive intervention. Families are matched with local volunteers who have completed at least 30 hours of training, have experience working with children and who visit families in their home once a week.

VFC currently supports families living in Sydney (Eastern and Southern Sydney region, Inner West, Fairfield LGA, Liverpool LGA, Bankstown LGA and Macarthur region), Bairnsdale (Victoria), Hobart, (Tasmania) and on the Gold Coast (Queensland). The program connects families with local health, early childhood education, family support and other community services and has been designed to address family challenges before they require intensive intervention.

2.5 Regional and remote areas face specific challenges

The lack of services in regional and remote NSW is a long standing issue well known to the NSW Government and the sector. Where services do exist, their ability to deliver a full suite of complex programs is subject to the issues of adequate and ongoing funding, the ability to attract and hold a qualified workforce and the community's ability and willingness to access and engage with the provider.

The ability to utilise the available infrastructure of the wider human services sector is an issue of particular importance for services in regional locations. Intra and cross sector collaboration can help bridge gaps in available services and improve the ability of the system to respond to early warning signs. This is particularly true between the early learning and maternal and infant health and must be supported by human service systems that can work in partnership, and information and data sharing.

The Government continues to fail to recognise the true costs to NGOs of design and delivery of effective services for regional and remote communities. Funding is too prescriptive with little or no allowance for services to engage and build relationships and trust or explore co-design or community partnerships. This narrow approach to funding and contracting leaves NGOs little room or incentive to innovate or think creatively about how to manage the particular issues that arise from regional and remote service delivery perspectives or how best to tailor responses to individual community circumstances.

There continues to be a wilful lack of recognition of the real costs in operating services in isolated communities. Contracts do not recognise the extra time and travel costs involved in servicing these communities, despite FACS having to work in the same communities under similar conditions.

Attracting and maintaining a skilled workforce remains an ongoing challenge that is not recognised in government contracts and which continues to hamper service delivery not just for NGOs but for the Department. The Benevolent Society's Family Referral Service in one regional centre has experienced a significant rise in the number of referrals of high risk clients due in part to the inability of the FACS office to recruit and retain staff.

FACS must acknowledge this sector wide issue and work with us to improve the ability of NGOs to attract and develop our workforces using its contracting and funding instruments.

3.1 Early targeted support, advice and case management

The Benevolent Society asserts that there are many known examples of successful early intervention models that it could adopt or expand, both in NSW and in other jurisdictions. The Benevolent Society and the NGO sector have been consulted on these issues through multiple forums, meetings and formal consultation processes.

It is our understanding that the Targeted Early Intervention reforms provide the framework for the Government's early intervention responses although information on the progress of these reforms has not been provided to the sector.

3.2 Community Hubs

The Benevolent Society believes that building the capacity of a community is an essential goal for the operation of a successful community hub. Key to this must be a clear definition of what 'community capacity building' is, with a meaningful set of measureable outcomes and which the hubs would need to deliver on.

The following have been highlighted as some of the best practice features of effective community capacity building:

- Promotion of community ownership
- Taking a holistic approach
- The need for mutual transformation
- Building sustainability
- Recognition of the importance of mutual trust.
- Adopting a decentralised governance structure:
- Community based accountability
- Recognition that relationships are a key driver
- Creation of feedback loops
- Long-term commitment by the facilitating agency

An easily accessible example is the Redlink Integrated Services Hub, which FACS funds to connect Redfern/Waterloo residents with security, health and legal services as well as conducting activities aimed at addressing social isolation, crime prevention and personal well-being.

Redlink is staffed by a range of government officers, including NSW Health, housing and tenancy officers, FACS staff, legal advisors and NGOs such as Foodbank and Homelessness NSW. The Benevolent Society has a social worker based there who can connect local residents looking for assistance or receive referrals from other agency workers to our child and family services. The Benevolent Society has built an effective relationship with individual agency officers at Redlink and believes it provides a suitable co-located model for an integrated community service delivery.

3.3 Multi-agency service coordination

The Benevolent Society believes the child protection system in NSW is characterised by a culture of blame rather than a culture of sharing information. Multi agency service coordination is hampered by this lack of information sharing between FACS and the NGO sector. Despite the 16A provisions, the Department can be reluctant to share all the information it has on clients and their families, leaving NGO's operating without a full picture of the client's circumstances and clients having to tell their often harrowing story over and over again. This lack of full disclosure by the Department, in particular when domestic and family violence is an issue can also create additional and unacceptable risk for the NGO workforce and their clients.

A number of factors underpin this reluctance, including a lack of trust between the Department and the sector; the Department's perceived inclination to hold information as a defence for decision-making; an unwillingness to operate in the risk space in an equal way with NGOs; and working with organisations and through programs that are new or unfamiliar to FACS staff.

The Resilient Families programs has seen collaboration and information sharing with FACS improve over time, as the Department becomes more confident in the efficacy of the program and relationships between the two agencies have been built. The 2017 Evaluation Report found during the first years of the Resilient Families (2013-15), challenges around joint working and information

sharing were reported, partly due to the need to embed and refine the operation of the centralised referral mechanism. The small numbers of families referred to Resilient Families also meant FACS had limited exposure and awareness of the service.

However, by 2017 the evidence showed that joint working and information sharing had continued to improve and that both FACS and The Benevolent Society staff were generally positive about these processesⁱ. The increase in information sharing has mirrored the development in understanding and trust between the Department and the program but has taken considerable time and effort.

The Benevolent Society is a partner in the Central Coast Multi-Agency Response Centre (CCMARC) and believes it is working as an effective model of government and NGO co-operation. The CCMARC has established long term relationships across agencies and NGO sector partners that have facilitated trust and information sharing not replicated in other parts of the system. The willingness of Government partners to share information means that service providers have the full picture and can rapidly and effectively respond to the need of the child and their family.

The CCMARC is a demonstration of how a coordinated cross agency and cross sector system can work, if decision makers understand and apply 16A properly, if workers are trained and empowered to work in partnership and if the needs of the child are paramount.

3.6 A monitoring and outcome Framework

The Benevolent Society believes that the NSW Government must consider approaches that will increase the transparency, frequency and independence of published child protection data. The key goal for the monitoring and outcomes framework must be the long term well-being goals of clients, not the saving or reinvesting of funding.

Families don't just need to be measured, they need to be helped. Measures should form part of the assessment process that is undertaken to determine the right support for each child and their family, not just as a funding requirement.

Service providers have unique, trusted relationships with thousands of families including those in hard-to-reach cohorts and we are well positioned to share valuable data. The Benevolent Society and the wider sector have repeatedly indicated their willingness and indeed the need to work collaboratively with the Government to determine the most appropriate data to collect, and the most efficient way to communicate that data and learn from it. Although this partnership approach will require additional funding The Benevolent Society believes it will deliver a more informed and effective framework than is presently available.

To this end, The Benevolent Society supports the Fams proposal for a two-year iterative approach to designing and refining a shared outcomes measurement framework. This work would align with the NSW Commissioning and Contestability Policy and Practice Guide, and support the transition of funding agreements to the new Human Services Agreementⁱⁱ.

The Fams proposal is for this work be done alongside a NSW Government campaign to collate useful data from various departments as well as service providers in the existing Data Analytics Centre (DAC). The DAC could then use the collated data to gain a more comprehensive understanding of the complex situation families are dealing with, and how best to support them.

3.7 Aboriginal collaborative partnerships and community controlled services

The best interests of Aboriginal children and their families can only be properly determined with the participation of Aboriginal people within the context of the broader agenda of self-determination. This is a long standing principle, backed by evidence and research to which the Department pays lip service, whilst continuing its business as usual approach.

The NSW Government has a responsibility to transform services for Aboriginal children and families to create a culturally safe and competent service system and to develop an Aboriginal child and family workforce. This workforce and community controlled organisations should be supported to participate in service design, delivery and decision-making across the child and family system.

NSW Government and mainstream providers also have responsibilities to support the development of Aboriginal child and family community controlled organisations through funding, innovation, collaboration and partnership arrangements that deliver new and enhanced services. This requires significant trust and relationship building that is not sufficiently supported by current Government funding models or policy priorities.

The Benevolent Society was encouraged by the presentation from ARDT Consultants and Tirkandi Inaburra at the recent TFM conference on their joint work to develop and build an evidence base for Tirkandi's program. This kind of proactive, practical support, funded by the Government must be expanded across the community controlled sector to build an evidence base and ensure their funding and operation viability.

The Family Matters Principles and Building Blocks for system reform provide a roadmap for governments and service providers on how to best develop a service system that meets the needs of Aboriginal children and their families. The Family Matters Report 2018 recorded the NSW Government as having 'regressed in its alignment to the building blocks, with community representatives raising high levels of concern including a lack of government transparency and low involvement of Aboriginal people and organisations in policy and legislative design'.ⁱⁱⁱ

The TFM reforms are a case in point. The 2016 decision to purchase MST-CAN and FFT-CW models was made without consultation with Aboriginal service providers, peak bodies or communities and despite there being no evidence to suggest suitability for Aboriginal families and children. There was no cultural testing of the program prior to purchase or tender and there is no evidence it is a suitable cultural fit. There has been no development of an Aboriginal workforce strategy to assist implementation and to meet the projected 50% target.

The Family Matters Report 2018 details the significant reforms that are taking place in state and territory jurisdictions to reduce the number of Aboriginal kids in the child protection system. The NSW Government has to date chosen to ignore the advice of Aboriginal people in the formulation of TFM, to legislate a fast track adoption, despite vociferous criticism from Aboriginal communities and has declined to sign up to the Family Matters campaign. Until the Government and its Department enable Aboriginal people to be a part of the decisions that are made about their children and their families, there will be little improvement in outcomes for Aboriginal people under the Government's reforms.

3.8 Awareness and capability development

The Benevolent Society believes multiple strategies need to be employed across government, the sector and the community to dismantle the stigma and culture of blame attached to families who need assistance.

At a Government policy level, the need to be proactive in dealing with risk rather than simply reactive is well recognised and articulated in this paper and in Their Futures Matter. What has been missing is the requisite funding to match the early intervention and prevention rhetoric.

The 2017 NSW Parliamentary Inquiry into the role of FACS in relation to child protection found consecutive state governments have failed to properly invest in the sector.^{iv} Of the \$1.85 billion FACS was allocated in the 2016-2017 budget for the provision of child protection related services,

the only expenditure that comes close to constituting prevention or early intervention expenditure is the \$117,429,000 (6.3 per cent) spent on family support services.^v

As is shown in the research and the literature over decades, families must be self-determining^{vi} while government's role is to provide the policy settings and adequate funding to ensure families have the information and opportunities for that to happen. This requires committed funding to universal child and family services, particularly in the child's first 2000 days, and targeted early intervention and prevention, family and intensive family services for children and their families.

4. System wide enablers

Workforce and Funding

A committed, skilled and supported workforce is vital for successful service delivery and outcomes for children and families. High staff turnover, the inability to fill positions and the significant pressure on NGOs to do more with less are all real issues that must be dealt with through changes to the way FACS funds and commissions for services.

Put bluntly, NGOs cannot compete with government on pay, and cannot increase pay for our staff without an increase in contract funding from government. Good practice takes intensive, concentrated engagement and cannot be limited by artificial timelines tied to a fee for service scale. That is not a model for principled, evidence informed practice and a well-paid, professional workforce cannot be recruited, developed and sustained without appropriate funding.

Quality information technology systems are the linchpin of quality service delivery. For the child protection system to continue supporting children and families, client data systems must be fit for purpose, and designed with a view to inform decision making. We strongly believe that data sharing solutions must be explored within the sector and across relevant partner agencies, and the system as a whole requires an integrated information technology system across State and Federal Governments and NGOs, as primary service providers. This would ensure a common language between funders and service providers, and allows for a consistent story of experience to be mapped.

Additionally, it is important to recognise that NGOs capture a vast number of operational and intervention based information about a family. This is an untapped resource for the sector and one that would drive informed and timely decision making at an individual family and community level, and support intervention and prevention actions.

The introduction of ChildStory has been an expensive and prolonged failure that is still not manageable for FACS staff or for NGO service providers. This was partially acknowledged by the Secretary in the FACS Annual Report 2018-19.

'Our initial introduction.....was marred by ineffective re-training of our staff and initial support. We have made – and continue to make – improvements to training, support and the platform itself to ensure ChildStory will realise its potential in 2018–19.'^{vii}

Despite consistent advice to be more considered in implementation and understand the implications of data migration from KiDS to ChildStory, the Department continued its mismanagement of this fundamental aspect of the child protection system at great cost to children and families, the service system and the NSW taxpayer.

ⁱ Evaluation of the Resilient Families Service (Social Benefit Bond) Pilot. Progress Report, Report 4, (October 2017) ARDT Consultants, p73

ⁱⁱ FAMS, *Investing in Children, the right support in the right place at the right time*, June 2018, p 14

ⁱⁱⁱ The Family Matters Report, 2018. SNAICC, p13

^{iv} NSW Legislative Council 2017 General Purpose Standing Committee No. 2 Report 46 – March 2017
<https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryReport/ReportAcrobat/6106/Final%20report%20-%20Child%20protection.pdf>

^v FAMS, *Investing in Children, the right support in the right place at the right time*, June 2018. P7

^{vi} Article one of the International Covenant on Civil and Political Rights (ICCPR) and in article 1 of the International Covenant on Economic, Social and Cultural Rights. Viewed on 1 March 2019 at <https://www.humanrights.gov.au/right-self-determination>.

^{vii} *FACS 2017-18 Annual Report*. Viewed on 15 March at 2019 https://www.facs.nsw.gov.au/__data/assets/pdf_file/0005/637241/2017-18-Volume-1-Performance-and-activities-report.pdf