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NATIONAL COALITION ON CHILD SAFETY AND WELLBEING
Submission to
CAFS Action Plan Working Group Discussion paper
Governance structure for implementing: **Safe and Supported:**
The National Framework for Protecting Australia's Children 2021-2031.

Families Australia and the National Coalition on Child Safety and Wellbeing (the National Coalition) appreciate the opportunity to provide feedback on the proposed Governance structure for implementing: *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*.

Families Australia is a national, not-for-profit, peak organisation that strives to improve the wellbeing of Australian families, especially those experiencing vulnerability and marginalisation. Our work is organised around three important ideas, namely, that Australia will be a fairer and more equitable and compassionate nation if we better protect and value children, if all families irrespective of their form are strengthened, and if there are genuine and lasting improvements in the wellbeing of Aboriginal and Torres Strait Islander peoples.

As a core aspect of our work, Families Australia convenes the [National Coalition on Child Safety and Wellbeing](#). The National Coalition on Child Safety and Wellbeing comprises some 250 non-government and research organisations including peak bodies, out-of-home care, child and family support, and Aboriginal and Torres Strait Islander organisations who are committed to advancing the national campaign on child safety and wellbeing in Australia.

This response has been informed by a consultation process with the National Coalition membership, led by the National Coalition Steering Group. Key themes emerged from member feedback, and the summary comment on positions and perspectives are outlined below. As with all broad coalitions, there were mixed views and divergent positions on some aspects.

CONSULTATION QUESTION 1

Do you have any comments on the summary of the proposed bodies, composition, and roles as document at Attachment A?

The National Coalition appreciates the formal commitment to representation for the four key governance parties in *Safe and Supported*:

- the Aboriginal and Torres Strait Islander Leadership Group,
- the National Coalition representing the non-Government sector,
- State and Territory Governments; and
- the Commonwealth.

The National Coalition has consistently expressed our strong support for the key role of the Aboriginal and Torres Strait Islander Leadership group (the Leadership Group). We reaffirm that commitment in this submission. We unequivocally support the Leadership Group being represented at all levels of the proposed governance arrangements - including representation at Community Services Minister level. This representation is crucial as we collectively pursue stronger progress on *Closing the Gap* targets.

To achieve change for vulnerable children and young people and families/carers across the full breadth of the Australian community, all parties to *Safe and Supported* need to work together at all levels to accelerate progress. Australia's non-Government sector - which delivers frontline services, responses and interventions to children, young people and families/carers - must always be a pivotal partner in this work. The National Coalition represents this powerful alliance of non-Government organisations and researchers.

The draft model proposes National Coalition membership of the Strategic Advisory Body and the four working groups, along with representation on the social determinants taskforce governance group, and regular engagement of the National Coalition through the 'strategic advice and consultation' stream of work. This level of representation is a minimum requirement to ensure the expertise and experience of the wider non-Government sector is at the table as a partner in pivotal moments of deliberation.

A number of our members called for National Coalition representation at a higher level of the proposed arrangements of the draft model. Direct involvement of sector representatives and service providers at the highest level of government decision-making – as respected partners in the work of change - leads to better decisions. The National Coalition will continue to advocate for this approach to be adopted by governments and across all aspects of policy, resource allocation and program design across social and human services fields.

National Coalition members also called for greater prominence of the voice of children/young people and their families/carers with experience of the child protection system. While various elements of the proposed governance arrangements could 'represent' those perspectives, direct involvement of those with experience of the child protection system in governance arrangements for *Safe and Supported* should be introduced.

Through the governance structures, we must also see a stronger presence of the voices of those living with disability, Culturally and Linguistically Diverse (CALD) communities and a diversity of NGO representation on groups progressing discrete issues. This will ensure the enhanced visibility and awareness of the Framework and the child and family sector is in a stronger position to achieve intended aims.

To that end, the National Coalition will ensure representative opportunities to contribute to *Safe and Supported* will be drawn from a mix of National Steering Group members, and representatives drawn from across the broader membership base. This approach was modelled in the mix of National Coalition representatives in the recent DSS led briefing on the Outcomes Framework and Theories of Change.

The details of the scope, terms of reference, mandate, reporting interactions and membership composition of the respective governance bodies being proposed will be key. For example:

- the primary role of the focus groups requires greater articulation - Is their focus advisory? Is it a problem-solving forum? Will focus groups be action-oriented (such as using methodologies to design and implement tasks)?
- how do the working groups feed into other decision-making bodies? We would like to hear from Aboriginal and Torres Strait Islander colleagues how the working group on over-representation will interface with the other three focus areas, noting intersections in policy and practice.

The National Coalition will contribute to the development of arrangements in this area.

Of particular note, there is no reference to the involvement of the National Coalition in the Monitoring and Evaluation Strategy (MES) that remains under development. We assume this is a drafting oversight, and seek explicit reference to our involvement in, and contribution to, *Safe and Supported's* ongoing MES.

The National Coalition acknowledges the commitment of all governments to the *Safe and Supported* and the leadership role that Community Services Ministers have shown. However, as government representatives, Community Services Ministers alone cannot achieve *Safe and Supported's* goals. Beyond Closing the Gap commitments, there is limited detail on how CSM's will ensure their colleagues are contributing to *Safe and Supported* and are introducing recommended measures to improving the safety and wellbeing of children and families. Similarly, as the CAFS level, it is unclear which whole of government mechanism will be used to ensure whole of government progress is being made on *Safe and Supported*.

In line with previous National Coalition representations, it is the National Coalition's view that a broader range of Ministers, and Ministerial portfolios should be present on a CSM level equivalent body. To significantly improve the likelihood of achieving positive change, formal involvement of key such as Ministers for Health (including mental health), Education, Disability, Education and Training, and Human Services needs to be included at the highest governance level of *Safe and Supported* at both Commonwealth and State and Territory levels.

CONSULTATION QUESTION 2

How might the information flow and relationship between Working Groups, the Shared Decision-making Body, and the Strategic Advisory Body be best depicted in the governance structure and expressed in Terms of Reference?

The complexity of the proposed governance structure will make it difficult to operationalise unless there are very clear roles and responsibilities and reporting structures, both for internal and external reporting. Terms of Reference and the scope of responsibilities for each body must be considered in the context of the specific group/body and the overall governing environment; Terms of Reference must be socialised across all governing bodies and understood in an individual and collective context.

It is essential for non-government service providers to work in partnership with the First Nations service providers to support the development, transition to and provision of more appropriate First Nations services for children and families. The system cannot change overnight. It will take years to turn it around and the sector must work collaboratively together to achieve this common goal in the best possible ways.

Strengthening the relationship and information flow between the Focus Area Working Groups and the Shared Decision-making Body for Aboriginal and Torres Strait Islander children body should be considered. For example, the current representation of Figure 1 has the Focus Area working group feeding into the Strategic Advisory Body only.

The estimated number of representatives (size) of most of the proposed groups/bodies has not been outlined. There must be sufficient numbers to enable for diversity of expertise and perspectives to be fed in and to progress work, however very large groups can become unwieldy. Given the volume of government groups/bodies being proposed, any 'sub working groups' or 'time limited' forums should be used sparingly.

CONSULTATION QUESTION 3

How might a new governance group supporting social determinants best approach the complexity of ensuring streamlined linkages with Safe and Supported across portfolio areas (for example, could the governance group develop an 'intersections strategy' across governance structures and prioritise strengthening interfaces with particular sectors)?

The predominant focus on the statutory system under *Safe and Supported* is recognised but this appears to have suffocated a broader public health approach and early intervention efforts. It remains the view of the National Coalition that both streams can be progressed concurrently without detracting from each other. If we want to make real change and protect Australia's children, we need to look at the evidence of what works in promoting early childhood development, more engagement in preschool and school, better health and mental health for children, and greater supports for parenting and parenting skills.

The proposed establishment of a 'social determinants taskforce' has the potential to be a valuable addition to proposed *Safe and Supported* efforts. Particularly so if the key focus of this dedicated group is to be on the whole system, broader social determinants and cross-portfolio initiatives in an intersectional context.

A core consideration of 'social determinants taskforce' will be the nature of the group's workplan and remit. The Leadership Group, CAFS and the Strategic Advisory body will need to ensure the work of the taskforce is sequenced and timed appropriately with other work being progressed. Who the taskforce would report to will also need to be made clear e.g., *is this group a capacity resource for all level of the governance structure to draw support from or does the Leadership Group commission bodies of work from time to time?*

Further, a narrow focus on a limited number of tasks or actions - to complement the work of other governance bodies - would seem appropriate.

CONSULTATION QUESTION 4

What other feedback do you have on the proposed structure?

Greater prominence of CALD Communities: A stronger consideration of a dedicated focus on culturally and linguistically diverse families in the governance arrangements is required – by all parties. There is a lot to be learned from elements of the approach to culture taken by Aboriginal and Torres Strait Islander families, and it's useful to consider synergies and lessons from that approach from CALD groups. Culture can have a profound impact for CALD families on interactions with child protection systems, and on family

wellbeing in general. To date, this has not been well-recognised and incorporated into mainstream child protection services and systems.

Communications strategy: A detailed communications strategy is required to ensure communication approaches and channels are effective at all levels of Government, the Leadership Group, the National Coalition, NGOs, children and young people, and the general public. There needs to be a planned approach with purposeful messaging via multiple channels and in multiple languages. All parties have a part to play in raising community and public awareness of efforts being made under *Safe and Supported*, including the public reporting of progress being made, what is not working and what will be done to correct the course. Accountability for commitments and outcomes achieved is paramount.

Maintaining a capacity and early supports approach: There will always be a focus on children already being harmed rather than promoting the protection of all children – we must maintain a capacity and early supports approach concurrently. For example, for children to be safe:

- our health system and primary healthcare networks are needed to support safe and healthy pregnancies and post-birth support through rigorous evaluation programs such as the pre- and post-natal nurse home visiting programs.
- our education system is needed to support positive educational and social development and pro social behaviors
- our planning system is needed to plan green open accessible spaces for children to play.

Population level supports for parents and carers: The scope of *Safe and Supported* also needs to broaden to include population-level supports for parents and carers with experience of child protection systems, and families who have received parenting supports - as well as those who could have benefited from, but missed out on receiving, parenting supports.

Poverty and Housing: While outside of the direct remit of *Safe and Supported*, we need to be cognisant that issues of poverty, precarious employment, homelessness and a lack of adequate affordable housing directly affect children and young people's safety and wellbeing and must be adequately addressed if we are to make any real change.

In closing, we note the first national framework recognised to a greater degree the interdependence of the NGO sector and government in policy design and service delivery. The NGO and research sectors remain absolutely critical to the success of *Safe of Supported*. Working alongside the Leadership Group, NGOs and researchers will continue to play a vital role in policy design and maintaining service delivery while concurrently supporting the emergence of ACCOs. While the NGO sector and the National Coalition are committed to this task, in practice it will require maintaining service continuity for children and young people and/or their families and carers at the same time as potentially divesting some activities or transitioning them to a new service. This is highly complex work, requiring detailed planning as well as high levels of creativity in the context of diminishing resources.

This framework's success will be maximised by the strong participation of the NGO and research sectors, represented through the National Coalition, which will be made more effective by the adoption of enhancements we have proposed in this submission.

Thank you for the opportunity to comment. We would welcome the opportunity to discuss the content of our response in greater detail.

Sincerely,



Jamie Crosby
CEO Families Australia

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