



About Act for Kids



Act for Kids is a national not-for-profit organisation that has supported children, young people and families for more than 35 years. We provide evidence-based, trauma-informed and culturally responsive services across metropolitan, regional and remote Australia.

"We help keep kids safe, heal from trauma and lead happy lives"

Operating 38 centres nationwide, our multidisciplinary teams include psychologists, social workers, counsellors, family support practitioners, occupational therapists, speech pathologists, early years educators, teachers and specialist domestic and family violence practitioners.

We work across the full continuum of need — from universal prevention to early intervention to intensive therapeutic and crisis responses.

Our strategic focus is on multi-generational change, recognising that children's safety and wellbeing are inseparable from the health, capability and resilience of the adults around them.

Act for Kids welcomes the opportunity to respond to this Discussion Paper.

Acknowledgement of Country

Act for Kids respectfully acknowledges the Traditional Custodians of the lands on which we work and gather. We pay our deepest respects to Elders past, present, and emerging, who are the keepers of memories, traditions, cultures, hopes, and aspirations of Aboriginal and Torres Strait Islander children, young people and families.

We further recognise the grief and loss Aboriginal and Torres Strait Islander families and communities have experienced from colonisation, resulting in historical, cultural, and intergenerational trauma.

At the same time, we honour and celebrate the enduring strength, survival, and resilience of Aboriginal and Torres Strait Islander peoples - the world's oldest living culture.

Act for Kids especially acknowledges First Nations children, young people, and families with whom we walk alongside. Act for Kids is committed to listening, learning, and supporting their journey in culturally humble and respectful ways and we stand in solidarity with them now and always.

VISION AND OUTCOMES

Does the new vision reflect what we all want for children and families?

Act for Kids strongly supports the vision and intent of the proposed new program. The consolidation of multiple fragmented programs into a single, flexible national model is an exciting and important reform.

The flexibility embedded in the new structure will allow organisations to build **bespoke**, **place-based responses** according to community strengths, local context, and the specific needs of each child and family. This removes long-standing barriers created by siloed program rules and creates a far more seamless service experience for families, who often move between universal, targeted and intensive supports.

Our hope is that this change will:

- enable workforce sharing
- reduce administrative duplication
- lower unnecessary overheads
- allow services to adapt and respond dynamically
- ensure a greater proportion of funding reaches families directly

For organisations serving children across the full wellbeing—to—child-protection spectrum, this model is highly valued and strongly aligned with real-world family need.

What are the two main *outcomes* we should be working towards for children and families?

The two proposed outcomes are fundamentally sound and strongly aligned with Act for Kids' evidence-based, multi-generational approach to creating long-term change:

- 1. Parents and caregivers are empowered to raise healthy, resilient children.
- 2. Children are supported to grow into healthy, resilient adults.

Children's wellbeing is profoundly shaped by the safety, capability and stability of the adults in their lives. Strengthening parenting, improving family functioning, reducing stress and adversity, and building safe, supportive relationships are all cornerstones of long-term resilience for children.

The new program structure, with its ability to support both children and the adults around them, provides an ideal platform to achieve these outcomes at scale.

Consideration: The essential role of community

While the outcomes are directionally strong, they do not yet fully acknowledge the critical role of community in children's wellbeing. Children's support networks extend well beyond parents and caregivers, and strong community connections are increasingly recognised as key to helping children thrive, particularly in contexts of adversity, social isolation, or limited access to services.

Strengthening the model by explicitly incorporating community as a core element across the streams and outcomes would:

- Better reflect the ecological systems children live within.
- Align with the ARACY Nest national wellbeing framework, which identifies family, culture, and community as core determinants of child wellbeing.
- Position the program to better meet the increasing complexity, service gaps, and community-level challenges emerging across Australia.



To operationalise this, we recommend:

- Embedding community indicators within program logic templates and funding guidelines to ensure consistent interpretation and accountability.
- Including measurable indicators such as local governance participation, cultural connectedness, and social capital measures.
- Linking community engagement explicitly to the two proposed outcomes, recognising that strong community networks amplify resilience for both children and caregivers.

PROGRAM STRUCTURE

Will a single national program provide more flexibility for your organisation?

A single national program would provide significantly more flexibility for organisations such as Act for Kids.

The proposed structure offers national consistency while still allowing for local adaptation and flexibility, which is essential across diverse communities, particularly in regional, rural and remote areas where service availability, workforce capacity and community needs vary dramatically.

Importantly, a single program removes the limitations created by siloed funding streams and enables organisations to design bespoke, place-based service offerings that reflect what each child, family and community genuinely needs.

Assuming the funding model adequately supports workforce requirements and meets the volume and complexity demands of local families, this approach would allow children and families to move fluidly between levels of support as their needs escalate or stabilise. This mirrors how Act for Kids' multidisciplinary teams already operate within services funded through philanthropy and fee-for-service arrangements by:

- preventing harm early where possible
- intervening when risks or vulnerabilities emerge
- providing specialised therapeutic support to children experiencing trauma and adversity
- engaging and strengthening caregivers to support long-term healing and resilience

We recognise that our ability to provide flexible services is most often restricted in government-funded programs where service criteria, prescribed activities and reporting outputs are predetermined and rigid. These constraints limit our capacity to tailor interventions, adjust service intensity or respond dynamically to emerging needs within families and communities. A single national program with greater flexibility would reduce these barriers and enable organisations to design and deliver services that genuinely reflect what children and families require at any point in time, within evidence informed parameters.

To maximise this flexibility, we recommend:

- Funding formulas that incentivise collaboration, such as weighting applications that demonstrate shared infrastructure, workforce pooling, or integrated governance arrangements.
- Clear guidance on how service intensity will be funded across all streams, not just tertiary supports. This should include a **tiered intensity model within each stream**, allowing for intensive early intervention where required, avoiding the common system flaw of investing heavily only after risks escalate.

A national program would also support far more effective integration across prevention, early intervention and intensive supports. It would reduce administrative duplication, streamline reporting requirements, enable coordinated workforce planning and free up resources currently tied up in separate contracting and compliance processes.

In short, we believe that a single national program would create the flexibility needed to deliver truly integrated, trauma-informed, ecological services, ensuring families receive the right support at the right time without artificial program boundaries acting as barriers.

Does the service or activity you deliver fit within one of the three funding streams? Do these streams reflect what children and families need now – and what they might need in the future?

The three activity streams — National Programs and Information; Prevention and Early Intervention; and Intensive Family Supports — broadly reflect the continuum of need we see across Australian communities. They provide a useful organising framework, and most Act for Kids services align well with these categories.

Act for Kids delivers services across all three streams. Although our organisation receives funding from federal and state governments, philanthropic partners and fee-for-service arrangements, our service profile naturally follows the continuum of need. The proposed streams are well suited to the current and emerging requirements we see in the communities we support, particularly when implemented with the flexibility to respond to local context.

1. National Programs and Information

• **Professional Development and Educator Support** — including virtual and inperson training for educators, schools, early childhood services and professionals.

2. Prevention and Early Intervention

- Learn to Be Safe with Emmy & Friends protective behaviours education for primary school children, their families and teachers.
- **Early Years Safety Threads** protective behaviours education for children aged 0 5, their families and early years educators.
- Little Leaps and Pathways to Early Learning and Development programs —
 developmental playgroups and home-visiting programs supporting early childhood
 development and caregiver capability.
- Family and Child Connect information, advice and referral for families needing support before statutory involvement.
- Assessment and Service Connect targeted assessment and service navigation for families with escalating support needs.

3. Intensive Family Supports

- Intensive Family Support (IFS) case management and parent coaching support for families with multiple and complex needs.
- Functional Family Therapy Therapeutic Case Management (FFT TCM) an
 evidence-based family therapy and case management program for families with
 multiple and complex needs.
- Individualised Support Services (ISS) highly intensive flexible, bespoke wrap around and ecological support and therapeutic care coordination for children with high and complex needs.



Services related to, but not fully captured in, the three streams:

These therapeutic services complement the above streams and play an important role in the continuum of support:

- **Integrated Therapy Services** specialist psychology, occupational therapy and speech pathology, including trauma-focused therapeutic intervention.
- Sexual Abuse Counselling Services therapeutic support for children and families affected by sexual abuse.
- Trauma Counselling Services counselling for children experiencing trauma, adversity or complex family circumstances.
- Safe Kids Out-of-Home Care services providing residential care in both remote and metropolitan Far North Queensland communities. These services support Aboriginal children who cannot safely remain at home and uphold their right to stay connected to their kin, community and culture.

Are there other changes we could make to the program to help your organisation or community overcome current/potential challenges?

Across all programs, regardless of the funding stream, Act for Kids applies an ecological and trauma-informed approach, recognising that a child's wellbeing is shaped by the relationships, environments and systems surrounding them. While some services involve direct family intervention, many therapeutic programs are designed primarily around the child's needs and complemented by targeted work with parents and caregivers. In these contexts, "family support" is not a discrete case management function but an integrated element of a broader therapeutic, care coordination and advocacy framework. This distinction is critical: the current terminology of intensive family support risks narrowing interpretation to traditional case management models, which does not reflect the complexity or diversity of supports families actually require. Services that do not fit neatly within the three proposed categories remain essential to the continuum of care and should be explicitly recognised as such.

Do the streams reflect what families need now and into the future?

Act for Kids believes the proposed streams largely reflect what children and families need now and into the future. The structure acknowledges the therapeutic and ecological nature of support across a continuum, which is important given that children and families rarely present with linear or static needs. The streams provide a framework that:

- supports early identification and prevention
- responds quickly when risks emerge
- provides specialised intervention for trauma and complex needs
- adapts as family circumstances change
- aligns with evidence on multi-generational and place-based approaches

For Consideration:

The current framing of **Prevention and Early Intervention** versus **Intensive Family Support** risks implying that early intervention cannot be intensive. Some cohorts, such as young mothers or parents with limited support networks, benefit most from intensive early intervention delivered before risks escalate.

Evidence from Australian and international practice consistently shows that the dose of support required is highly individualⁱⁱ. Some families in "family support" streams may only



need light-touch, short-term assistance, while others in the early intervention space require sustained, relationship-based, high-intensity work to prevent progression to secondary or tertiary services.

If intensity is only conceptualised within the tertiary/secondary space, these streams risk repeating a common system flaw: investing intensive effort too late, after risks have escalated. Allowing for intensive early intervention would better reflect what we know works—meeting families early, with the right level of support, to avoid escalation to statutory systems iii.

PRIORITISING INVESTMENT

Do you agree that the four priorities listed on page 4 are the right areas for investment to improve outcomes for children and families?

Act for Kids supports the Australian Government's priorities to:

- 1. Invest early to improve family wellbeing, break cycles of disadvantage, and reduce the need for later interventions like child protection.
- 2. Prioritise connected, co-located, and integrated services that work together to meet family needs.
- 3. Ensure services are informed by, and respond to, community needs.
- 4. Improve outcomes for First Nations children and families by increasing the number of Aboriginal and Torres Strait Islander community-controlled organisations (ACCOs) delivering supports in locations with high First Nations populations.

Additional priorities and considerations

While we support these priorities, Act for Kids emphasises two critical considerations:

1. Early intervention must allow for intensity where required.

Investing early to break cycles of disadvantage cannot rely solely on light-touch or universal supports. There is a cohort of families, such as young parents, families experiencing cumulative adversity, or those without strong informal networks, who may not meet "multiple and complex" criteria but still require intensive early intervention to prevent escalation. Many reforms unintentionally restrict intensity to tertiary or statutory interfaces, missing the opportunity to stabilise families much earlier. The Minderoo Foundation's *Cost of Late Intervention* report, prepared by The Front Project, shows delayed support is now costing Australia \$838 per person each year, or \$2,704 for every child and young person aged 0–24. National spending on late intervention has increased by 47% since the 2019 report—well beyond inflation and population growth—highlighting the urgent need to shift toward stronger early intervention^{iv}

We recommend that DSS clearly define "intensive early intervention" within funding guidelines and provide examples of eligible activities, such as sustained home-visiting, wraparound supports for young parents, and relationship-based coaching, so providers can design services that meet this need without ambiguity.

2. Strengthening ACCOs must go hand-in-hand with strengthening mainstream organisations to provide genuine choice.

We strongly support increasing ACCO leadership and delivery. We would add that families also value choice of safe, culturally responsive services, including mainstream organisations.



Supporting ACCOs should be matched with investment in capacity-building for mainstream providers to strengthen best practice, cultural capability and partnerships so First Nations children and families have multiple, high-quality options embedded in their communities.

IMPROVING FAMILY WELLBEING

Do the proposed focus areas – like supporting families at risk of child protection involvement and young parents – match the needs or priorities of your service?

The three proposed focus areas—early intervention in the early years (0–5), families at risk of vulnerability and child protection involvement, and breaking cycles of disadvantage by supporting young parents—align strongly with the evidence base and reflect priority cohorts we work with at Act for Kids. These areas are consistent with what we see in practice across Queensland and nationally.

Are there other groups in your community, or different approaches, that you think the department should consider to better support family wellbeing?

1. Intersectionality and Complex Needs

While these focus areas are appropriate, we recommend that DSS explicitly consider intersectionality in program design. Families often experience overlapping vulnerabilities—such as young parents who are also First Nations, living with disability, or experiencing housing instability. Funding guidelines should encourage integrated responses that address these intersecting needs rather than treating them in isolation.

2. Wraparound Supports for Young Parents

Breaking cycles of disadvantage for young parents requires more than parenting programs. We recommend investment in wraparound supports that include housing stability, education and training pathways, and social connection initiatives. These elements are critical to improving long-term wellbeing and reducing intergenerational disadvantage.

3. Intensive Early Intervention for Priority Cohorts

We strongly support early intervention but emphasise that intensity must be available where required. Young parents and families experiencing cumulative adversity often need sustained, relationship-based, high-intensity support delivered early—before risks escalate. DSS should define "intensive early intervention" in funding guidelines and provide examples of eligible activities, such as extended home-visiting, integrated case coordination, and culturally responsive coaching.

4. Dedicated Focus on First Nations Families

Aboriginal and Torres Strait Islander children and families should be identified as a priority in their own right. Grouping them solely under "families at risk of vulnerability" risks obscuring systemic drivers of over-representation. A dedicated focus ensures investment aligns with community-led priorities, cultural strengths, and Closing the Gap targets.



CONNECTED, CO-LOCATED, AND INTEGRATED SERVICES

What are other effective ways, beyond co-location, that you've seen work well to connect and coordinate services for families?

We strongly support DSS's focus on integration however emphasise that true integration requires deliberate and ongoing investment in the coordination and infrastructure that bind services together. Our experience in connected and coordinated environments demonstrates that the most critical work often sits behind the scenes, including:

- service coordination roles
- stakeholder meetings and partnership governance
- shared referral pathways
- interagency planning
- data and IT infrastructure
- cultural capability development
- local leadership and management
- community engagement

These activities do not produce direct client outputs but are essential for smooth, barrier-free access to support. Service integration cannot be achieved on minimal organisational cost assumptions.

To strengthen this priority, we recommend:

- Ring-fencing a percentage of funding for integration infrastructure, including shared IT systems, governance roles, and workforce dedicated to coordination.
- Embedding performance measures for integration, such as reduced referral delays, increased joint case planning, and improved family experience of seamless service access.
- Providing clear guidance in funding guidelines on eligible integration activities, so organisations can confidently allocate resources to these critical functions without risk of non-compliance.

The program must explicitly fund the glue—the workforce, systems, time, and back-of-house capacity needed to integrate services effectively.

RESPONDING TO COMMUNITY NEED

Beyond locational disadvantage, what other factors should the department consider making sure funding reflects the needs of communities?

Communities are best placed to determine their own priorities, and local decision-making must be central to the new model.

We recommend:

- Local governance committees (including ACCOs, community leaders, service providers and lived-experience representatives) to oversee local funding allocations
- Recognition that urban, regional and remote areas have vastly different contexts, service systems, costs and workforce challenges
- Funding formulas that account for the higher costs of outreach, in-reach and travel in thin-market or remote communities
- Flexibility for local adaptation rather than a one-size-fits-all national design

 Without strong community-led mechanisms, national funding risks becoming generic and disconnected from actual need.

IMPROVING OUTCOMES FOR ABORIGINAL AND TORRES STRAIT ISLANDER CHILDREN

What else should be built into the program design to help improve outcomes for Aboriginal and Torres Strait Islander children and families?

As a mainstream organisation, Act for Kids strongly supports investment in program design, commissioning and ways of working that improve outcomes for Aboriginal and Torres Strait Islander children and families. We do not speak on behalf of First Nations peoples; rather, we recognise and respect the leadership of First Nations communities, First Nation Peaks and ACCOs in determining what works.

Accordingly, we encourage the Department to draw on best-practice examples of First Nations service delivery across Australia and embed principles articulated by First Nations Peak Bodies into program design, funding frameworks and grant processes.

What we can add is our perspective as a mainstream organisation with 552 members in which 16% identify as Aboriginal and Torres Strait Islander and with approximately 30% of our clients identifying as First Nations. We identify the following key elements that would strengthen our ability to support First Nations children through this program to include:

- Identifying Aboriginal and Torres Strait Islander children as a priority group in their own right This avoids positioning First Nations families solely within "at-risk" categories and supports a strengths-based, community-led approach.
- Embedding outcomes that privilege connection to culture, community, story and identity Frameworks such as the ARACY Nest Wellbeing Framework and Cultural Humility Frameworks show how cultural connectedness is central to wellbeing.
- Ensuring program outcomes and performance measures reflect communitydefined indicators of wellbeing - This should include storytelling, cultural strengths and relational outcomes—not only narrow or rigid KPIs.
- Prioritising investment in regions with high Aboriginal and Torres Strait Islander populations - This ensures funding aligns with population need, remoteness, and service gaps.
- Providing dedicated cultural consultation funding ACCOs and cultural advisors should be appropriately remunerated for cultural support, and mainstream agencies would benefit from the capacity and resources to access this support in ways that demonstrate its value and uphold cultural integrity.

MEASURING OUTCOMES

What types of data would help your organisation better understand its impact and continuously improve its services?

Act for Kids already collects robust quantitative and qualitative data across multiple clinical systems and validated tools. Our organisation operates under a comprehensive Impact Framework aligned to the ARACY Nest domains, providing a structured and evidence-informed way to measure child wellbeing. This alignment allows us to track progress across domains such as safety, health, learning, material basics, social and emotional wellbeing and participation, and directly links outcomes to our organisational purpose.

A particularly valuable source of information is the frequent feedback we collect directly from children and young people. Their voice offers authentic insight into whether services are helping them feel safer, more connected and more supported, and is central to our continuous improvement processes. The combination of child voice, validated clinical measures and domain-based wellbeing indicators provides a clear picture of impact and highlights where services may require adjustment.

Further value would come from clearer departmental guidance regarding the specific outcomes each program stream aims to achieve, so we can map our indicators even more precisely to expectations.

What kinds of data or information would be most valuable for you to share to show how your service is positively impacting children and families?

The most meaningful data we can share includes:

- Child-reported outcomes and feedback, capturing experiences of safety, wellbeing, connection and therapeutic progress.
- Outcome indicators aligned to the ARACY Nest domains, demonstrating progress across health, learning, safety, relationships, participation and material basics.
- Program logic-aligned measures, showing that we are delivering on the intended purpose and theory of change for each service.
- Qualitative case examples, ethically de-identified, that illustrate change from the perspective of children, families and caregivers.
- Clinical outcome data from validated tools, where appropriate.

This combination provides a strong, balanced picture of impact that goes beyond outputs alone.

If your organisation currently reports in the Data Exchange (DEX), what SCORE Circumstances domain is most relevant to the service you deliver?

Act for Kids does not currently report into the Data Exchange; however, our existing indicators align closely with the SCORE Circumstances domains. Because our Impact Framework is already mapped to the ARACY Nest domains, alignment with DEX would be straightforward. The mapping between SCORE and the Nest domains is outlined below:

SCORE Circumstances Domain	Aligned ARACY Nest Domain(s)
Physical health	Health
Mental health, wellbeing and	Health; Social and Emotional Wellbeing
self-care	
Personal and family safety	Safety
Age-appropriate development	Learning and Development
Community participation and	Participation; Culture and Identity
networks	

Family functioning	Social and Emotional Wellbeing; Culture and Identity
Financial resilience	Material Basics
Employment	Learning and Development (skills); Material Basics
Education and skills training	Learning and Development
Material wellbeing and basic	Material Basics
necessities	
Housing	Material Basics; Safety

This alignment demonstrates that the Nest framework we currently use provides a strong foundation for SCORE reporting if required.

What kinds of templates or guidance would help you prepare strong case studies that show the impact of your service?

Act for Kids has strong internal capability in producing high-quality case studies and narrative evidence. While we do not require extensive storytelling templates, having clear, consistent guidance from funders would be useful in ensuring alignment with their expectations and promoting consistency across organisations. The most helpful support would be:

- Clear guidance on the outcomes and impact measures the department wishes to see demonstrated.
- Standardised headings and structure for case studies to ensure consistency.
- Clear word counts for each section to balance detail with conciseness.
- Guidance on consent, privacy and de-identification when including child or family voice.

WORKING TOGETHER

What does a relational contracting approach mean in practice?

For us, relational contracting is about building a genuine partnership over time rather than delivering to a fixed, transactional brief. It creates the trust, flexibility and shared purpose needed for complex child and family work. In practice, it means open communication, joint accountability, long-term stability, and the ability to adapt and innovate together as community needs shift or as we learn from team members, families and stakeholders what is working or needs adjustment in program design. It also means co-designing with the people who know their community best and embedding evidence – led, trauma informed, culturally safe practice that is continuously learning.

The criteria that matter most are: demonstrated service quality and outcomes, real partnerships with local communities; stable, well-supported workforce; and a clear willingness to co-design, learn and adapt.

How should the department decide who receives a relational contract?

Good tenders don't always reflect good practice. The most reliable indicators of quality are often the voices of the people who work with the service every day, including families, Elders, referrers, local partners and community organisations. They know who delivers value, who is trusted, and who shows up consistently.

A balanced assessment should include performance and quality data, collaboration history, workforce stability, and strong feedback from the community. That combination gives the clearest picture of who can genuinely deliver outcomes under a relational model.

Is your organisation interested in relational contracting? Why/why not?

Relational contracting aligns strongly with how we already operate in regions where there is high social capital and genuine trust with funders. Even without formal relational agreements, we are frequently invited to co-design programs, test new approaches and refine service models in response to emerging needs.

A clear example is our involvement in piloting the early iterations of the Queensland Government's Referral for Active Intervention, Family Support Alliance and Assessment and Service Connect programs. These pilots were highly successful and ultimately informed the design and rollout of statewide family support initiatives. From the outset, all parties recognised that the models were not fully defined and that performance measures would evolve. Because there was clarity of intent, a shared purpose and a strong, trusted partnership, the services were able to develop through an iterative, action-learning process and become better tailored to local community needs.

A formal relational contract would strengthen this way of working — enabling greater innovation, providing more stability for the workforce and ultimately improving outcomes for children, families and communities.

Summary

In summary, Act for Kids strongly supports the proposed shift to a single, flexible national program for families and children, emphasising the importance of bespoke, place-based responses and integrated service delivery. This submission highlights the need to explicitly recognise the role of community, enable intensive early intervention, and ensure funding models incentivise collaboration and adaptability. It also supports a dedicated focus and investment in First Nations children and families, robust measurement of outcomes, and relational contracting that prioritises genuine partnership. These recommendations aim to create a more responsive, equitable, and effective system that meets the diverse and evolving needs of children, families, and communities across Australia.

¹ Hoang, A., Sanders, M. R., Turner, K. M., Morawska, A., Cobham, V., Chainey, C., & Simmons, E. (2024). Connecting families, schools, and communities: A systems-contextual approach to sustainable futures for children. *Sustainable Development*, 32(5), 4505-4517.

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iv Minderoo Foundation & The Front Project. The Cost of Late Intervention in Australia. Minderoo Foundation; 2024. Available at: https://www.thefrontproject.org.au/images/FINAL_4%20SEPT_COLI%20-2024-report-e-version-FINAL.pdf

^v Social Ventures Australia. *Targeting Investment Where It Counts: Investing Early to Reduce Lifetime Costs — Report.* Social Ventures Australia; February 2025. Available at: https://www.socialventures.org.au/wp-content/uploads/2025/02/Targeting-investment-where-it-counts-report-Feb2025.pdf