

CFECFW response: A new approach to programs for families



Background

The Centre for Excellence in Child and Family Welfare (the Centre) welcomes the opportunity to provide feedback on the proposed changes outlined in the Department of Social Services (DSS) discussion paper *A new approach to programs for families and children* and in the supporting documents.

The Centre is the peak body for children and families in Victoria and Tasmania. For over 100 years we have advocated for the rights of children and young people to be heard, to be safe, to access education and to remain connected to family, community, and culture. We represent over 180 community service organisations, students and individuals working across the continuum of child and family services, from prevention and early intervention through to the provision of out-of-home care and immersion in youth justice. Our member organisations work closely with children, young people and their families, and provide a wide range of services and supports to families experiencing vulnerabilities and disadvantage.

Overview

The Centre supports the stated intention of the DSS proposal. Recognition of the need to improve and prioritise prevention and early intervention from an individual and economic standpoint is a positive step forward.

The Centre agrees with the stated objectives and outcomes of the proposed model, which are to empower parents and caregivers to raise healthy, resilient children and for children to grow into healthy, resilient adults.

We welcome the commitment to strengthening services for First Peoples children and families, something which is long overdue given the strength of the evidence base which shows the importance of self-determination and Aboriginal-led solutions in improving outcomes for Aboriginal families and communities.

We recognise the efficiencies to be gained from streamlining five existing Commonwealth Government programs for children and families into a single national program and the flow-on benefits of increased local responsiveness, reduced fragmentation, reduced administrative burden, and increased flexibility. It is positive to see DSS recognition of the administrative load associated with grant writing and management, which can detract from service delivery functions.

While the Centre broadly supports the proposed reforms and can see the benefits of consolidating and streamlining these services, we also have concerns which we have outlined in our response. In particular, the high level nature of the document means that there is a general lack of clarity regarding the operational and implementations elements of the proposed model.



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Strengths of the model

Proportionate funding prioritisation for ACCO-led services

Consistent with self-determination, the Centre supports the concept of proportionate funding for Aboriginal Community Controlled Organisations (ACCOs) and Aboriginal-led service delivery for First Nations populations. Our child and family member organisations in Victoria have been engaged for several years now in the transfer of assets, resources and infrastructure to support the transfer of Aboriginal children into Aboriginal care. Such investment and support will require a long-term commitment from the federal government to build organisational capacity and enable program delivery to be sustained.

Greater efficiencies and certainty

The Centre welcomes the commitment to longer term funding – up to five years – for the new program, which is likely to provide more stability and staffing security.

Simplified reporting, greater flexibility in funding arrangements, streamlining and consolidation, and structural reform are all likely to contribute to greater efficiencies.

Early intervention and prevention

The Centre welcomes the focus of the proposed new program on early intervention and prevention, which aligns with what works in child, youth and family programs our members are delivering in Victoria and Tasmania. For our sector, early intervention and prevention means early in life (from pre-birth) and early in need.

Concerns

Clarification needed

There needs to be much greater clarity in regard to how the government will develop, commission and implement this new model. In particular, there are significant gaps in the detail surrounding the proposed new model. These details will need to be worked through carefully before community service organisations (CSOs) are invited to tender.

In particular, we would like to see clarification in relation to the following.

- In replacing the five long-standing programs, what will be the 'phase out' plan?
- What will this mean for families already engaged or on waiting lists for these programs?
- Will the existing federal programs be absorbed or simply replaced? The programs that are being merged are so broad that it is not clear what the new program will look like.
- It is also unclear whether CSOs will be expected to transition their existing service models into the new streams or develop new, innovative models. If the expectation is that there will be new models then the government will need to allow sufficient time for service design before the commissioning process begins.
- Of the existing programs, there is a focus on families experiencing challenges within the federal court circuit and those experiencing family violence. Yet in the consultation papers provided, there is no reference to a specific focus on these areas, both of which are known to have a

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significant impact on wellbeing, safety, community and economy. Clarity on how these areas will be established as a priority focus is required.

- The proposal reads as though it will primarily fund individual programs but it is unclear where or how it also feeds into state budgets. The intersection of existing state-funded programs with the new programs is unclear, as is the overlap with NDIS and federal court specific programs. The relationship between state and federal systems needs to be clarified.
- The focus of the proposal is consistent with Victoria's 'stream' based approach and appears to overlap in the types of programs offered. However, it is unclear how these will then be differentiated or what will be in place to avoid duplication.
- There is also mention of existing service provision being an element in the application priority yet there is limited consideration of whether this will place some states at a disadvantage.
- Legislatively, there are already challenges with information sharing between state and federal programs, which negatively impacts the outcome goals outlined in this proposal. Once again there is limited detail on how information sharing will be integrated.
- There is a missed opportunity across all three streams in terms of genuine community capability strengthening.
- While the importance of prevention and early intervention is acknowledged across all three papers, the focus appears to be on professionals providing direct service to nuclear families. However, the informal relationships, networks and community-based relational supports available to families are a key element in strengthening wellbeing and resilience.
- This proposal could benefit from an increased focus on programs which support local and larger societal shifts as a primary prevention measure, early intervention measure *and* acute response measure. This is particularly relevant given the focus on reducing children's involvement in the Child Protection systems and in supporting ACCO-led initiatives. Families need accessible information *AND* a healthy village around them.
- CSOs do not only work with parents/caregivers; they work with the full breadth and diversity of family configurations, including extended families. The focus areas could be strengthened by recognising families who fall outside these categories but remain vulnerable. For example, the families of children with disability need to be a stronger priority within the new program.
- The Centre welcomes targeted support for young parents; however, the proposal places a strong emphasis on mothers, with limited acknowledgement of the role of violence, gender-based expectations, or the needs of non-birthing parents. While the consultation summary highlights the importance of engaging fathers, supporting diverse parents, and upskilling and diversifying the workforce, these elements are not reflected in the evidence or discussion papers. It is therefore unclear whether they are incorporated into the proposed model.
- The consultation summary points to the critical importance of workforce development in the success of these programs but there is little mention in either the discussion paper or the evidence summary about how this is likely to be supported.
- The single grant approach is a positive step in terms of reducing the administrative burden associated with grants management and increasing the potential for program flexibility but, if

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programs are expected to 'flex up' or 'flex down', how will this be accounted for in funding when it impacts targets, key performance indicators and caseloads? For example, in an early intervention direct service program, often caseloads can be higher, and overheads lower. At more acute levels of intervention, it is the opposite. Accounting for this will be important.

- The funding implications are not clear, for example, will the new model mean reduced funding for current providers? Does it mean ACCOs will receive separate funding?
- The timelines could also be clarified. There will be a significant amount of work needed to become 'tender ready' and sufficient time needs to be allowed to enable trusted relationships to be built where these do not currently exist.

Importance of retaining the community aspect of the five programs

- The Centre does not believe the proposed streams sufficiently capture the community development and place-based work which underpin the existing activity programs; the streams proposed by DSS do not fully reflect the collaborative, place-based work that underpins the success of these programs. It is critical that this element is not lost in the shift to a different model.

Nature of the commissioning model

- There is some concern among existing, locally-based CSOs about opening up the marketplace to new providers and the impact on communities where agencies miss out. The new tendering process and outcome of this is likely to be disruptive to the sector and will impact long-term services which are often delivered in an integrated way – how do we make sure this deep knowledge is not lost?
- The commissioning model could inadvertently disadvantage some providers and reduce local responsiveness; a one-size-fits-all approach to commissioning can disadvantage organisations which operate at scale while maintaining place-based, in-person delivery. By limiting providers' ability to describe local needs and tailored responses, the process favours very large or very small providers, they need to be able to demonstrate the value of extensive local partnerships.
- While the inclusion of 'relational contracting' implies a positive approach, greater detail is needed to understand its characteristics and what parameters and supports would exist in the current economic climate. The relational contracting piece is aspirational and it is unclear how this could be implemented within current resourcing.

Suggestions for consideration

- It is important that the redesigned program retains the community development principles that have underpinned the effectiveness of the existing programs. The model needs to retain a clear whole of community focus and vision. The existing programs responded to local needs and strengths and this feature cannot be lost. An explicit focus on inclusive and connected communities to enable children, young people and families to feel safe and thrive is required.
- The new program needs to have a much stronger child rights focus, incorporating the voice



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of children and young people as core elements in the program. Currently this is absent from the description of the proposed model.

- The commissioning model should be flexible enough to allow for multiple submissions from providers across the three funding streams. The new program needs to be community-led, responsive to local need, draw on local evidence of what works and, where possible, tap into existing collaborative relationships which have built up over time in local communities.
- Supporting Aboriginal-led services requires a long-term commitment by government. Proportionate funding is critical to self-determination and these services need to be set up for success.