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## FEEDBACK ON THE NEW APPROACH TO PROGRAMS FOR FAMILIES AND CHILDREN

Thank you for the opportunity to provide feedback on the new approach to programs for families and children.

As Commissioner for Children and Young People in Western Australia, I have a statutory responsibility under the Commissioner for Children and Young People Act 2006 (WA) to advocate for the views of children and young people to be heard in decision-making that affects them. This role includes giving priority to, and having special regard to, the interests and needs of Aboriginal and Torres Strait Islander children and young people, and to children and young people who are vulnerable or disadvantaged in any way.

In undertaking these responsibilities, I must also have regard for the United Nations Convention on the Rights of the Child (UNCRC) which upholds the right of all children and young people to be protected from harm, to feel and be safe, to be treated with respect, and to participate in decision-making that affects them.

Every child has a right to live in a society that prioritises their safety, health, and wellbeing. Effective policies must address their unique developmental, psychological, and social needs, with coordinated support from government and community services. A crucial aspect of this is strengthening systems that support children, families, and their communities.

I strongly advocate for the implementation of holistic services that address the diverse needs of children and young people, and so I welcome the new streamlined approach to replace the five separate child and family programs and turn them into a single national program. This submission specifically focuses on the Department of Social Services new approach to programs for families and children in the context of Western Australia (WA).

The proposed approach outlines an integrated and evidence informed national program. It recognises that effective reform requires an efficient, updated and coordinated strategy that is delivered concurrently, across the entire system. I welcome the emphasis on the two key outcomes: establishing that parents and caregivers are empowered to raise healthy and resilient children and young people and further ensuring that those children and young people are supported to grow into healthy and resilient adults.

This acknowledgement that supporting families strengthens children, and supporting children strengthens families, is crucial to improve the wellbeing of children and young people, their families, and communities. When viewed in the context of the further four priority areas for government: Invest early to improve family wellbeing; connected, integrated services; services that are informed by community needs; and increased Aboriginal and Torres Strait Islander community-controlled

organisations, it reflects a considered and comprehensive basis in which to build an effective single national families and children program.

I particularly welcome the prioritisation of community-led and culturally safe organisations delivering supports in locations with high First Nations populations. This strengthens participation as acknowledgement of cultural identity, community strength, and family structures, is critical when seeking to improve the long-term health, safety, wellbeing and support of Aboriginal people and their communities. For Aboriginal children and vulnerable young people, timely support in the early years is imperative to significantly reduce life-long disadvantage and to ‘Close the Gap’ in early development outcomes<sup>i</sup>.

While I support the government’s attempt to tackle the administrative burden service providers currently face, I believe there are considerations that must be addressed to ensure that a streamlined approach truly delivers improved outcomes for children and young people, particularly those that are most vulnerable.

It is essential that the government recognises the value of the five existing programs, each of which operate with distinct functions and complexities and specialist workforces, such as Family and Domestic Violence, Mental Health and Trauma services. These programs must be preserved and strengthened. During the transition period, there is a heightened risk of service gaps emerging and this could result in crisis services dominating support provisions and other support services becoming deprioritised. Ultimately, children and young people must continue to have reliable access to the services they need most, when they need them. Disruptions to the continuity of care and support should be carefully monitored, and the implementation of a new national program must ensure the continuous delivery of a highquality, joined-up, effective and consistent service.

Children and young people exist within interconnected systems, including their family, community, and school environments, all of which play a critical role in their development. Holistic care must address their needs across these systems, particularly in schools where they spend significant developmental years. Early intervention in schools is linked to better long-term outcomes and more effective support. Therefore, I recommend that the Department of Social Services widen its focus beyond ages 0-5 to include the broader schooling years, prioritising early intervention within this crucial context.

A significant concern is that a streamline approach may worsen existing challenges and lead to oversimplification. This, in turn, risks the loss of specialised expertise, the development of an inexperienced workforce and the dilution of services for children and young people, particularly those with complex or high-risk needs.

For example, the vast size of WA already places considerable pressure on key government support services<sup>ii</sup>, including limited funding and capacity and the increasing needs and demand for services of rural communities. These factors create challenges for government in establishing connected, co-located and integrated service models. Given that access to services is already limited, the proposed funding scheme should account for these constraints when assessing grant applications. Rather than simply prioritising applications deemed ‘favourable’, the focus should be on ensuring that services remain sustainable, accessible and responsive to community needs.

Furthermore, although it is common for community-needs assessments to rely on tools such as the Socio-Economic Indexes for Areas (SEIFA) to identify regions experiencing disadvantage, this approach can be particularly problematic in Western Australia. While SEIFA provides a broad, area-level measure of socio-economic advantage and disadvantage, it does not capture individual circumstances<sup>iii</sup>. Instead, it summarises conditions across an entire area, which risks obscuring the experiences of vulnerable individuals living within statistically advantaged regions.

For example, in WA, many rural communities host mining operations and may appear economically advantaged at an area level, when in fact families and children and young people are facing significant poverty and exacerbated inequality<sup>iv</sup>. Without careful interpretation, these limitations can lead to misinformed decisions and inaccurate assumptions about the local needs of children and young people in these communities.

It is therefore essential for the Department of Social Services to use SEIFA alongside additional data sources, such as those highlighted in the discussion paper (e.g. Australia Early Development Census and census data), to gain a comprehensive and accurate understanding of local community conditions, particularly in relation to vulnerable populations.

The Department of Social Services has a unique opportunity to create a national children and family program that delivers lasting improvements for vulnerable children and young people. This initiative should focus on sustainable reform, ensuring children not only survive, but thrive. By adopting an efficient, supportive, and evidence-based approach, we can achieve meaningful and sustained progress for their wellbeing. I look forward to the continued development of this important initiative.

Yours sincerely,

5 December 2025

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<sup>i</sup> Australian Institute of Health and Welfare, 2025, Closing the Gap targets: key findings and implications, [Closing the Gap targets: key findings and implications](#) – Accessed 24/09/25 <sup>ii</sup> The University of Western Australia, 2022, Big Issues for WA, [Big-Issues-for-WA.pdf](#) – Accessed 26/11/25

<sup>iii</sup> Australian Bureau of Statistics, 2023, Socio-Economic Indexes for Areas (SEIFA), [Using and interpreting SEIFA | Australian Bureau of Statistics](#) – Accessed 28/11/25

<sup>iv</sup> Loussikian. K ,2014, The Conversation, [West cashes in on resources boom, but inequality also up](#) – Accessed 01/12/25