

Are you an individual or making a submission on behalf of an organisation?

Organisation

Organisation name

Ethnic Community Services

Is your organisation....?

- None of the above

Please specify

CALD specific community organisation

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

Ethnic Community Services (ECS) supports the overall vision and outcomes and welcomes the focus on strong families, confident caregivers and resilient children. However, the vision would be strengthened by recognising that families do not thrive in isolation. Many children, particularly those from migrant and refugee backgrounds, grow up within extended kinship systems and tightly connected community networks that play a central role in their wellbeing. For these families, informal supports such as cultural groups, faith communities, bicultural connectors and local peer networks are often the first and most trusted source of guidance, early intervention and parenting support.

The current vision risks being interpreted through a Western nuclear family lens, which does not reflect the lived realities of many culturally diverse communities. Caregiving and financial responsibilities often extend beyond the immediate parent–child unit, and children’s wellbeing is shaped by a broader ecosystem that includes grandparents, adult siblings, community “aunties” and “uncles”, elders and settlement networks. Recognising these community structures as protective factors is essential to designing programs and funding models that truly meet the needs of diverse families.

ECS therefore recommends expanding the vision to acknowledge that children and families are supported by strong families and strong, connected communities, ensuring that community-based strengths are visible, valued and appropriately resourced.

2. Are the two main outcomes what we should be working towards for children and families? Why/Why not? - Outcome 1: Parents and caregivers are empowered to raise healthy, resilient children - Outcome 2: Children are supported to grow into healthy, resilient adults.

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

ECS supports the intention to create a single national program, provided that the structure does not unintentionally preference large providers at scale. A national program can improve consistency and reduce administrative complexity, but only if it is designed in a way that protects local relationships, cultural responsiveness and community presence. These factors are essential for effective engagement with families from migrant and refugee backgrounds.

Experience from other national systems shows that scale alone does not guarantee equitable access. Under the National Disability Insurance Scheme, market based commissioning and standardised pricing created pressure for smaller and community based providers, particularly in regional and culturally

diverse areas. In many locations, smaller providers were unable to compete, which contributed to gaps in service availability and reduced choice for participants. This demonstrated that a national structure can unintentionally marginalise the community organisations that are best placed to provide culturally safe and locally informed support.

A similar risk exists within the proposed program if funding and commissioning models reward reach over responsiveness. Large organisations may have the administrative capacity to manage national contracts, but they often do not hold the long term community relationships or bicultural workforces that enable meaningful engagement with families. Universal family services are effective only when they are adapted to local conditions from the beginning, not retrofitted after implementation. Communities differ significantly in language needs, cultural practices and settlement experiences, and these differences directly influence how families access and use support.

ECS recommends that DSS ensure the national program structure includes clear mechanisms that preserve the role of community based organisations. This should include selection criteria that value cultural capability and lived experience, resourcing for bicultural and bilingual workforces, funding flexibility that supports local adaptation and explicit expectations for genuine collaboration with local partners. These measures will help ensure that a national approach enhances rather than replaces the community connections that families rely on.

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

The three stream structure provides a useful way to organise supports across different levels of need, although the current framing does not yet reflect how families access assistance in practice. From ECS's long experience working with migrant and refugee communities, effective early intervention depends on trust, cultural understanding and local relationships in addition to formal program delivery. These elements are not visible within the prevention stream as currently described, despite being essential for reaching families who may face barriers to engaging with mainstream services.

ECS's program delivery reinforces this point through evidence gathered across more than five years of multilingual playgroups funded under the NSW Start Strong Pathways program, which has shown that newly arrived families often need support to understand play based learning, early childhood development, early intervention pathways and the Australian approach to early education. These conversations occur successfully only in culturally safe spaces facilitated by bicultural workers who can address language needs, cultural norms and

sensitivities around disability or developmental concerns. Without this community based engagement, early intervention supports may exist locally yet remain inaccessible in practice.

The relationship between the three streams also warrants clearer articulation. Families seldom move through services in a linear way. Many require prevention supports and more intensive assistance at the same time, or shift between them as circumstances change. Unless DSS clarifies how providers are expected to coordinate across streams, there is a risk of creating new barriers or fragmenting support. Families should experience continuity and be able to move fluidly between levels of assistance while maintaining trusted relationships.

ECS welcomes the proposal for longer funding periods, as multi-year contracts are essential for formative evaluative assessment, refinement of engagement approaches and meaningful dialogue with government about effective practice and its policy implications. Longer cycles also support workforce stability and enable community based organisations to sustain the relationships that underpin early intervention.

To strengthen the three stream model, ECS recommends that the prevention stream explicitly recognise the role of community connectors, bicultural workers and local organisations in reducing cultural, practical and trust related barriers to early help seeking. This could be supported by program guidance that names these functions as core components of early intervention, assessment criteria that value cultural capability and local engagement and funding provisions that allow for outreach, relationship building and community-led engagement activities. These adjustments would ensure the stream structure reflects the real conditions in which families engage with support.

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

ECS continues to experience several systemic challenges that limit the ability of migrant and refugee communities to access early intervention and prevention supports in a timely and meaningful way. Addressing these barriers within the program design would significantly improve outcomes for families who face cultural, linguistic and practical hurdles when engaging with the service system. A major challenge for ECS is sustaining a stable and skilled bicultural workforce, which is essential for effective engagement with newly arrived families. Bicultural and bilingual staff bring vital cultural knowledge and language skills that enable families to access early intervention, yet current funding settings often treat these roles as short-term or peripheral. Insecure funding also limits the ability of organisations to recruit, retain and develop staff and makes it difficult to offer the continuity of relationships that families rely on. In addition, many newly arrived

community members who wish to enter the early childhood or community services sector face barriers such as the cost of qualifications, limited recognition of prior learning and a lack of supported and accessible training pathways. ECS sees strong potential for partnerships between community organisations and registered training providers, where community organisations can offer work experience, mentoring and career pathways and training providers can deliver affordable or subsidised qualifications and microcredentials. Stable workforce investment and supported training pathways are therefore critical to sustaining the cultural capability needed to support diverse families effectively.

Another challenge is that outreach and community engagement work is not consistently recognised or funded, despite being essential for early identification and prevention. In our multilingual playgroups and parent engagement programs, families often need guidance to understand play based learning, early childhood development and early intervention pathways before they feel comfortable accessing formal services. Delivering this foundational engagement requires time, trust and culturally safe spaces, yet current funding models do not always accommodate these activities as core program components.

By addressing these challenges through sustained workforce investment, supported training pathways and explicit recognition of community engagement activities, the new program structure would be far better positioned to meet the needs of culturally diverse families and support organisations like ECS to deliver effective early intervention.

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

ECS considers the four priority areas to be sound and broadly aligned with what families need, particularly the emphasis on early intervention, integrated service delivery, community informed practice and improved outcomes for First Nations children and families. These directions reflect ECS's long experience working alongside migrant and refugee communities and respond to many of the challenges families face when engaging with fragmented or reactive systems. A significant gap, however, is the absence of an explicit focus on culture. Cultural norms, language, community relationships and migration experiences shape how families understand child development, how they recognise concerns and whether they feel comfortable seeking early support. For many migrant and refugee communities, trust in services is closely linked to cultural safety, bicultural engagement and the availability of information in community languages. Without naming culture as a foundational consideration, the priority areas do not fully reflect the realities of early intervention for a large proportion of Australian families. This omission is particularly evident in Priority Area 3, which rightly highlights the

importance of services being informed by and responsive to community needs. In ECS's experience, cultural needs are central to this responsiveness. Families engage meaningfully only when services are able to address language barriers, cultural stigma related to disability or developmental concerns and the sensitivities associated with navigating new systems after settlement. Explicitly recognising cultural needs within this priority area would strengthen its clarity and practical relevance.

ECS also supports the focus on improving outcomes for First Nations children and families and acknowledges this as an area in which Aboriginal Community Controlled Organisations hold cultural authority and leadership. While the cultural needs of First Nations communities are distinct, the importance of culturally grounded approaches resonates strongly with our work alongside migrant and refugee communities. In both contexts, culture is a critical enabler of trust, safety and early engagement.

ECS recommends that culture be introduced as a cross cutting principle that informs all four priority areas. This would better reflect the diverse contexts in which families live and ensure that early intervention and prevention efforts are responsive to the cultural factors that shape family wellbeing and help seeking.

7. Are there any other priorities or issues you think the department should be focusing on?

ECS encourages the department to prioritise the national workforce challenges that directly affect early intervention and family support. Workforce shortages across early childhood, family services and community organisations are significant and continuing to grow, and these shortages are even more pronounced in roles that require cultural capability. Services cannot deliver early intervention at any scale without a qualified and culturally skilled workforce. Yet the sector is struggling to attract and retain staff because of low wages, demanding conditions and limited professional pathways. Without national attention to workforce development, the impact of the new program will be constrained regardless of how well it is designed.

The shortage of workers with cultural and language skills is especially critical. Families who are newly arrived or who speak languages other than English depend on bicultural staff to understand early childhood development, recognise developmental concerns and navigate early intervention pathways. However, there is no national strategy to build, support or retain this capability. ECS sees strong potential for coordinated workforce initiatives that improve pay and conditions in the early education and family support sectors, expand training and qualification pathways and create culturally responsive entry points for people with lived experience and community knowledge.

ECS also highlights the importance of helping families understand and engage with early intervention in culturally safe ways. For many newly arrived families, early intervention is unfamiliar and can carry stigma or confusion. Families may need time, trusted relationships and clear information delivered in their preferred language before they feel comfortable discussing developmental concerns or seeking support. National investment in culturally informed communication, parent education and community engagement would support families to recognise concerns early and access help confidently.

Finally, ECS encourages the department to strengthen national alignment across early years initiatives. Families currently navigate services delivered across Commonwealth, state and local systems, each with different referral processes and expectations. Greater alignment between federal programs and state based early childhood and education systems would improve continuity for families and reduce the administrative complexity faced by both families and service providers. Addressing these national priorities would significantly enhance the program's capacity to support families to understand, trust and engage with early intervention, ensuring that services are not only available but practically and culturally accessible

8. 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?

ECS agrees that the focus areas align with the needs of the families we support. Newly arrived families, young parents and families navigating multiple systems with limited English proficiency are common in our programs, and these groups benefit significantly from early intervention. We also note that some child protection concerns require particularly sensitive engagement, as cultural child rearing practices may conflict with Australian child safety expectations. Supporting families to understand these expectations early, in culturally safe ways, is an important form of prevention. Overall, the proposed focus areas reflect the priorities of our service when they are implemented with cultural responsiveness in mind.

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

ECS encourages the department to explicitly recognise newly arrived migrant and refugee families, families with limited English proficiency and families with children showing emerging developmental or language needs. These groups often face barriers related to language, cultural norms or unfamiliarity with Australian

systems, and they rely heavily on trusted community networks to understand and act on early concerns. Approaches that strengthen wellbeing include working through community based entry points, supporting bicultural engagement early in the parenting journey, delivering parent education about Australian approaches to child development and safety and using culturally informed communication rather than simple translation. Effective early intervention for these groups also requires engagement with community organisations, faith leaders and cultural groups who influence parenting beliefs and help shape community norms. Involving these stakeholders supports consistent messaging, strengthens trust and creates a more holistic approach to prevention. Recognising the role of community as a partner in early intervention would improve access and ensure families can engage confidently with supports.

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

ECS has seen that light touch case management embedded within community based programs is one of the most effective ways to connect families with the supports they need. In our multilingual playgroups, having the flexibility to offer personalised assistance has enabled families to access early intervention services, address practical barriers such as transport and understand entitlements such as the Child Care Subsidy and Family Tax Benefit. Bicultural workers play a key role in this approach by offering support in families' preferred languages, navigating cultural norms and helping families feel confident engaging with unfamiliar systems. Staff can also assist with tasks such as completing forms, making referrals and coordinating across multiple services. When funded appropriately, embedded case management allows coordination to happen within trusted relationships, rather than through separate appointments or unfamiliar settings, which can be a barrier for culturally diverse communities.

11. What would you highlight in a grant application to demonstrate a service is connected to the community it serves? What should applicants be assessed on?

In our own grant applications, ECS highlights the depth and continuity of our relationships with local communities and the ways these relationships shape how families engage with support. We do this by showing how our bicultural and bilingual staff reflect the communities we serve, how families access our programs through trusted community entry points and how our service delivery has evolved in response to community needs identified through everyday engagement. Practical indicators such as consistent participation, referrals from within cultural networks and the ability to reach families who typically face barriers to early help

seeking demonstrate genuine community connection.

If applicants are to be assessed on community connection, ECS recommends that this focus remain light and flexible. Assessments could consider whether organisations can demonstrate established presence, culturally safe engagement within their funded work and meaningful relationships with local community groups, schools or cultural organisations. These elements help ensure services are grounded in the communities they serve, without creating new or unfunded consultation requirements for providers.

12. Beyond locational disadvantage, what other factors should the department consider to make sure funding reflects the needs of communities?

ECS encourages the department to recognise cultural, linguistic and settlement related factors as key drivers of need, alongside locational disadvantage. Families who are newly arrived or who speak languages other than English often face barriers related to language, limited knowledge of Australian systems, stigma around disability and developmental concerns and uncertainty about how to navigate early intervention or child protection pathways. These factors can significantly delay help seeking, even in communities that are not considered socioeconomically disadvantaged. Funding should also reflect the higher cost of delivering culturally safe engagement, including bicultural staffing, multilingual communication and outreach based work. Considering these cultural and settlement related dimensions would ensure funding more accurately reflects the needs of diverse communities.

13. What's the best way for organisations to show in grant applications, that their service is genuinely meeting the needs of the community?

ECS suggests that the strongest indicator a service is meeting community needs is clear evidence that it adapts its practice in response to what families experience, rather than delivering a fixed model. In our own applications, we highlight how insights from everyday engagement guide our decisions about communication, outreach and the kinds of support families find most useful. We also show how our bicultural workforce identifies emerging needs early and how partnerships with local groups help us respond to issues that affect particular cultural communities. Demonstrating this kind of responsiveness, within the scope of funded work, provides a realistic and meaningful way to show that services are aligned with community needs without creating expectations for additional unfunded consultation.

14. How could the grant process be designed to support and increase the number of ACCOs delivering services to children and families?

Needs to be answered by First Nations providers and community members.

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

As above

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

ECS would benefit most from more timely data on local migration trends, including information on recent arrivals by language group and settlement patterns within specific areas. This helps us plan outreach, tailor communication and ensure our programs remain aligned with the cultural and linguistic needs of the communities we serve. Understanding who is arriving and where families are settling is essential for delivering early intervention in a way that is responsive, culturally safe and relevant.

17. 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?

ECS encourages a focus on data that reflects how families experience services, as this provides the clearest insight into families' priorities and what supports them to feel confident and culturally safe. Qualitative information gathered through everyday engagement is particularly valuable, including short feedback from parents, reflections from bicultural staff and observations about how families respond to different types of support. These insights help organisations understand impact through the lens of families' lived experiences rather than through outputs alone.

Alongside this, robust program records and quantitative data remain important. Information captured through routine attendance and intake processes, such as families' preferred languages, how they first connect with programs and whether they require bicultural or bilingual support, helps show whether services are reaching those who face cultural or linguistic barriers. Data on referral pathways and whether families are able to follow through with support also strengthens understanding of accessibility and early engagement.

Together, qualitative insights and consistent program records provide a meaningful

and proportionate picture of how services support families, without creating unnecessary administrative burden for community organisations.

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

ECS has been reporting in the Data Exchange (DEX) since 2014.

Most relevant SCORE Circumstances domains are:

- Community participation & networks
- Aged appropriate development
- Education and training
- Mental health, wellbeing & self-care
- Physical health
- Personal and family safety
- Family functioning

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

For many community organisations without dedicated monitoring, evaluation and learning teams, simple and practical guidance on qualitative data collection would make case study development far more achievable. Templates that help staff capture short observations, parent reflections and examples of change over time within everyday program delivery would support consistent and meaningful documentation of impact without creating additional administrative burden. Clear guidance on basic qualitative analysis methods, such as identifying themes or linking examples to program outcomes, would also strengthen the quality of case studies.

Workshops or train the trainer modules for managers would further build capability across the sector. Supporting staff to feel confident with qualitative methods helps embed reflective practice into routine service delivery and ensures that case studies accurately represent families' experiences rather than relying on anecdotal accounts. These tools would enable organisations to prepare strong and credible case studies that communicate impact effectively while reflecting context-specific findings.

20. What does a relational contracting approach mean to you in practice? What criteria would you like to see included in a relational contract?

For ECS, a relational contracting approach means funding arrangements that recognise the importance of trust, flexibility and community relationships in

achieving outcomes. In practice, this involves regular dialogue between the provider and the department, a shared understanding of community needs and the flexibility to adjust activities as families' circumstances change. Relational contracting also values cultural expertise and the work of building and sustaining trusted relationships with families, which is essential when supporting migrant and refugee communities.

Criteria for relational contracts should be light and focused on practice rather than scale. They might include demonstrated cultural capability, strong community relationships, the ability to reach families who face barriers to engagement and a track record of adapting services in response to community needs. These elements align with the nature of relational work and ensure that contracts support flexibility rather than impose new administrative burdens.

21. What's the best way for the department to decide which organisations should be offered a relational contract?

ECS encourages the department to prioritise organisations with strong local relationships and cultural capability, rather than solely those with the largest footprint or national brand recognition. Relational contracting is most effective when providers have deep connections within the communities they serve, a culturally responsive workforce and the ability to reach families who are traditionally disengaged from mainstream services. Partnerships with cultural, faith and grassroots community groups can also indicate that an organisation has the trust and presence needed to deliver relational work.

Many smaller community organisations would benefit from support to demonstrate their suitability for relational contracting, as this approach is relatively new for much of the sector. Providing capacity building opportunities, clear guidance and small amounts of funding to undertake community consultation or evidence gathering would help providers prepare strong applications without placing additional unfunded expectations on them. This would also ensure that relational contracting does not inadvertently disadvantage smaller organisations that are well placed to deliver this work but lack the internal resources to prepare complex proposals.

22. Is your organisation interested in a relational contracting approach? Why/why not?

ECS is open to a relational contracting approach because it aligns with the way we work with communities and reflects the flexibility needed to support culturally diverse families. Our service model relies on trust, culturally sensitive engagement and adapting support as families' circumstances change, which fits naturally with

a relational model. However, interest in this approach depends on the framework being appropriately resourced, proportionate and designed in a way that does not disadvantage smaller community organisations. A relational contract would be most effective if it enables flexibility, strengthens collaboration and provides stability without adding new reporting burdens.

23. Is there anything else you think the department should understand or consider about this proposed approach?

ECS encourages the department to consider the implications of relational contracting for small and medium community organisations, particularly those without access to legal, procurement or contract management teams. Introducing a new contracting model can create strategic uncertainty for organisations that do not have the internal capacity to navigate complex tendering requirements or interpret new compliance expectations. Clear guidance, sufficient lead time and accessible information will be essential to ensure that smaller providers can participate on an equal footing and are not unintentionally disadvantaged by the transition to a relational model.

Providing practical support, such as plain-language guidance or short workshops on how relational contracts will operate in practice, would also help community organisations understand what is expected of them and adapt their systems accordingly. Ensuring a fair and transparent process will be critical for maintaining a diverse provider landscape and enabling the organisations that are most closely connected to their communities to remain competitive.