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Thank you for inviting input on the DSS Families and Children Activity reform consultation. I'd like to contribute perspective from lived experience as a former therapeutic foster carer.

BACKGROUND:

I was a ██████████ therapeutic carer in Victoria. ██████████ provides intensive therapeutic intervention for children with severe behavioral challenges and complex trauma - the "vulnerable families" population DSS framework explicitly mentions.

CRITICAL GAP - TIER 3 INTENSIVE INTERVENTION:

Victoria cut \$4M from ██████████ funding early 2025. This exemplifies a systemic problem: the missing "Tier 3" intensive intervention tier for families and children who need more than early support but should avoid crisis responses.

Current DSS FaC Activity framework appears to be:

- Tier 1-2 (Early support): Children and Parenting Support, Family and Relationship Services ✓
- [TIER 3 GAP: Intensive intervention for complex cases]
- Crisis responses: Child protection, out-of-home care, youth justice X

CONNECTION TO DSS FRAMEWORK GOALS:

DSS goal: "Children and young people thrive"

Current reality: Children with complex trauma default to out-of-home care/justice system

With Tier 3: Intensive intervention achieves thriving while keeping families together

DSS goal: "Family relationships flourish"

Current reality: Crisis responses sever family relationships

With Tier 3: MST/FFT strengthen family relationships while addressing challenges

DSS goal: "Adults are empowered"

Current reality: Parents disempowered by crisis system involvement

With Tier 3: Parents gain skills and support to manage complex needs

DSS VULNERABLE FAMILIES FOCUS:

Framework explicitly mentions "vulnerable or at-risk families."

Tier 3 intensive intervention specifically serves this population - those for whom early support is insufficient but who can succeed with intensive family-based intervention.

#### WHAT'S MISSING - TIER 3 INTENSIVE INTERVENTION:

Evidence-based Tier 3 models exist:

- **Multisystemic Therapy (MST)**: Intensive family intervention, proven outcomes
- **Functional Family Therapy (FFT)**: Structured family therapy for behavioral issues
- **Intensive therapeutic foster care (TFCO model)**: Family-based alternative to residential care

These achieve DSS goals for vulnerable families at lower cost than crisis responses.

#### RECENT VALIDATION:

Commissioner for Aboriginal Children and Young People (Victoria) resigned November 20, citing "growing over-representation of Aboriginal children in out-of-home care and youth justice" and stating "policies can mean difference between life recovered or prison cell."

Her resignation highlights what happens when Tier 3 gap exists: vulnerable families with complex needs fall through to crisis systems, undermining DSS goals.

#### RECOMMENDATIONS FOR CENTRE'S SUBMISSION:

1. **DSS reform should explicitly include Tier 3 intensive intervention tier**
  - Not just early support (Tier 1-2)
  - But intensive intervention when early support insufficient (Tier 3)
  - Before crisis responses necessary (child protection, out-of-home care)
  - Essential to achieve DSS goals for vulnerable families
2. **Establish national standards for intensive intervention capacity**
  - MST, FFT, intensive therapeutic foster care availability
  - Protect from state-level political cuts (as Victoria cut █████)
  - Multi-year funding commitments for program stability
  - Federal Families and Children Activity framework should include Tier 3
3. **Aboriginal families priority**
  - Aboriginal children over-represented in population needing intensive intervention
  - Commissioner resignation validates this concern

- Culturally responsive Tier 3 models essential to DSS goals for vulnerable Aboriginal families

4. **\*\*Cost-effectiveness framework\*\***

- Tier 3 intervention: \$10K-\$120K per child/family
- Crisis alternatives: \$162K-\$1M per child (residential care, Victorian data)
- Federal investment in Tier 3 achieves DSS goals at lower cost than current gap

5. **\*\*Workforce development\*\***

- Training for Tier 3 intensive intervention professionals
- Career pathways in family-based intensive work
- Prevent workforce exodus when programs cut

**ALIGNMENT WITH DSS FRAMEWORK:**

Current DSS FaC Activity programs serve important early support function. But to achieve DSS goals ("children thrive," "families flourish," "adults empowered") for VULNERABLE families, Tier 3 intensive intervention must be included in framework.

Without Tier 3: Vulnerable families fall from early support to crisis, DSS goals unachievable.

With Tier 3: Complete continuum achieves DSS goals for all families, including most vulnerable.

I have comprehensive brief with Victorian data, evidence base, cost-benefit analysis, and detailed implementation recommendations. Happy to provide if useful for Centre's submission development.

Thank you for soliciting sector input on this critical reform.

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Former [REDACTED] Therapeutic Carer, Victoria

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