

Targeted Earlier Intervention Programs:

NCOSS's Response to the Sector
Consultation Paper

30 October 2015

About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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INTRODUCTION

All children and young people in NSW deserve the best start in life. A properly-funded, cohesive and effective early intervention can ensure that even the most vulnerable children grow receive the support they need to set them on a positive path early in life.

This submission provides recommendations towards the development of such a system. In addition to drawing from the published literature, it has been informed by consultations with our members conducted to inform our Pre-Budget Submission, our 1 in 7 Children in Poverty Campaign and our campaign on reform, contracting, regulation and other funding processes “A Fair Deal for Community Services”. This involved 21 consultations across NSW, reaching over 280 people representing 197 organisations. It has also been informed by individual conversations with key member organisation and other peaks, our attendance at the Sector roundtables convened by Western Sydney Community Forum, other consultative forums and our own research.

The first part of our submission outlines the case for increase investment in early intervention services and other key initiatives that will improve outcomes for children, young people and their families. The second part of this submission is structured around the five aims for the reform identified in the FACS Targeted Earlier Intervention Program Sector Consultation Paper, and outlines critical issues that must be address if the aims of the reform are to be achieved. The third part of this submission situates early intervention services within the broader service delivery context and identifies at the intersection between service systems. The final section of this submission makes recommendations in relation to the reform process itself.

SUMMARY OF RECOMMENDATIONS

1. Invest an additional \$15 million per annum in activities and programs that ensure children and young people are connected to their families and communities.
2. FACS should work with ABSEC to redevelop the Aboriginal child welfare sector in NSW, and to support the evolution of accredited Aboriginal community-controlled OOHHC agencies into holistic Aboriginal child and family services.
3. FACS should require all service providers to ensure cultural safety for clients and staff via their KPIs and funding contracts.
4. FACS should move towards a more streamlined outcomes-based reporting framework that measures the impact of services at both the individual and population levels.
5. FACS should work in partnership with Aboriginal community-controlled organisations to develop meaningful service KPIs that reflect culturally appropriate and holistic service delivery.
6. If NGOs are to continue to take on high-need clients, they should be appropriately resourced to do so. Capacity building initiatives should ensure services have the right skill mix to work successfully with high-need clients.
7. Roles and responsibilities in relation to working with families subject to risk of significant harm reports should be clarified, with clear guidelines and protocols established to ensure these align with the best interests of children, young people and families.
8. Resources should be allocated to address gaps in the service system continuum, particularly support for families who currently fall below the threshold for Brighter Futures, and support for families with children who have been removed into care.
9. Requirements for a pre-existing evidence base should not restrict innovation, or the tailoring of programs to fit the local community.
10. FACS should facilitate the development of a centre of excellence modelled on the UK's Centre for Excellence and Outcomes in Children and Young People's Services (C4EO).
11. Targeting of resources to those in greatest need should not occur at the expense of community development and universal preventative initiatives.
12. District-level planning should facilitate the design and delivery of services tailored to local need, resulting in a more responsive service system. They should involve other Government agencies delivering services to vulnerable people and providers of universal children's services. In addition, those involved in planning processes should be representative of the geographic, cultural and linguistic diversity within regions.
13. FACS should ensure local level data collected by relevant Government agencies is made available to service providers and local communities on a meaningful geographic scale that reflects the variation within each FACS district.

14. FACS should continue working to develop the systems and processes required to support ongoing engagement with clients and community members during the reform period and beyond.
15. FACS should lead the development of an easily accessible and searchable database of services and implement processes to ensure information is comprehensive and up-to-date.
16. Resourcing for coordination and networking between services should be built into funding models.
17. FACS should streamline assessment processes, lead the development of common referral pathways and provide guidance to organisations on the transfer of client records.
18. Services should be given greater flexibility to work with people outside strictly defined eligibility criteria, to place value on client relationships, and to work with clients for an appropriate duration based on client need.
19. Services should be made available in the local community, at locations that are convenient to clients, with childcare, access and transport needs factored into the planning and funding of services.
20. Organisations should be informed of funding arrangements post July 2016 prior to the end of this calendar year.
21. FACS should establish an indicative timeline for the next stages of the reform process with milestones developed in consultation with the sector, ensuring that later stages of the process are planned with sufficient time for organisations to prepare.
22. Funding should be allocated to support organisations to adapt to changes arising from the reform process. Particular consideration should be given to the needs of small organisations, with a view to maintaining diversity within the sector.
23. Procurement processes should be designed to build on and enhance existing collaboration.
24. Procurement processes should value and respect local knowledge and expertise, allocating a measurable value to these attributes.
25. Post-reform, FACS should move towards five-year funding cycles.

SECTION ONE: THE CASE FOR INCREASED INVESTMENT

As the FACS Sector Consultation Paper states, one of the goals of early intervention programs is to support vulnerable children, and to prevent the escalation of serious issues such as statutory child protection.

In NSW, however, there has been a steady increase in both the number and rate of children entering out of home care (Figure 1). We now have the second highest rate of children in out of home care of all the States and Territories.¹ Families and children are clearly not getting the support they need when they need it, before a crisis occurs.

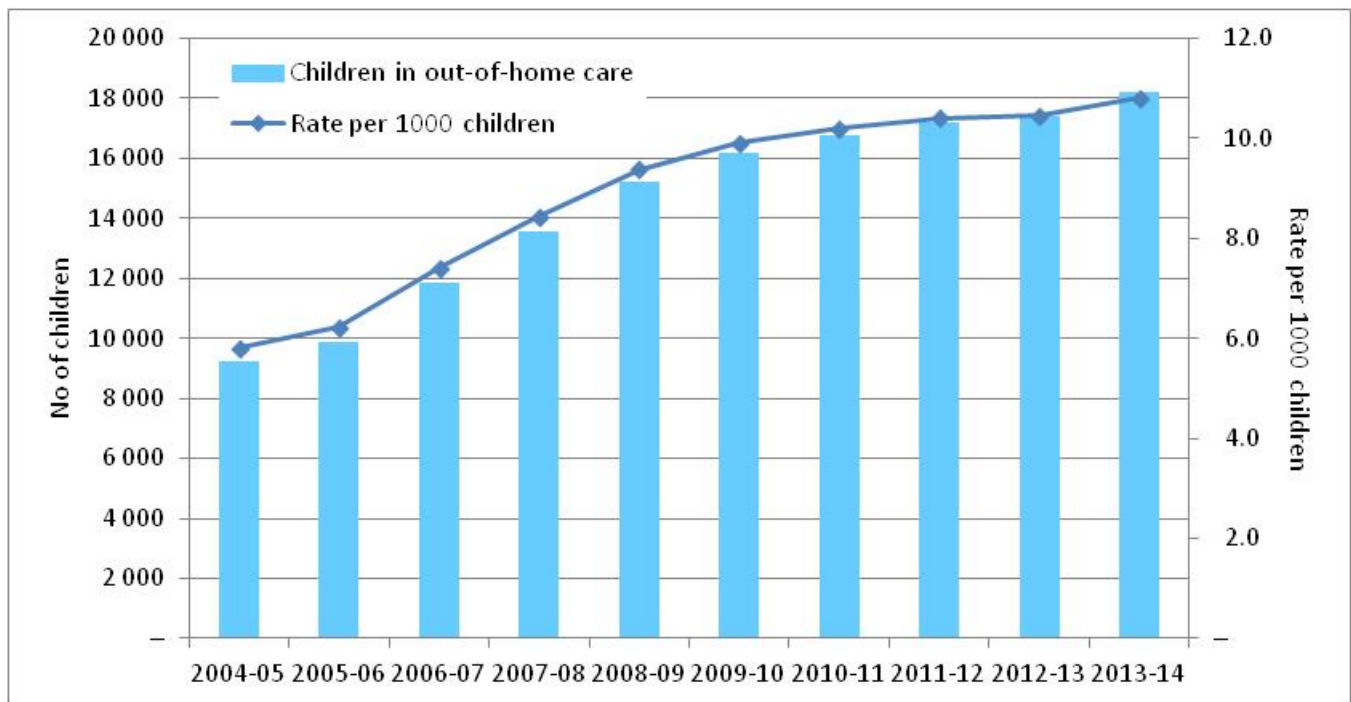


Figure 1 Increase in the number and rate of children in out of home care in NSW since 2004

One driver behind these statistics is inadequate investment in early intervention. Service providers report that they have long waiting lists; families seeking help are waiting too long before they receive it. Services are seeing increasingly high-need clients, who are presenting with issues that take more time and resources to resolve. It is widely agreed that vulnerable families are not being identified and referred to services early enough in the course of an issue to prevent the breakdown of relationships and other serious harm.

It is also widely agreed that early intervention services are more effective and less costly than late intervention and crisis responses. The National Framework for Protecting Australia’s Children 2009-2020 sets out a long-term

¹ Senate Economics References Committee (2015) [Out of Home Care](#)

approach to reducing child abuse and neglect.² It aspires to a public health model of services that emphasises universal and secondary interventions, with tertiary interventions as a last resort. Similarly, the *2007 Special Commission of Inquiry into Child Protection Services in NSW* (Wood Inquiry) observed that: “The child protection system should comprise integrated universal, secondary and tertiary services, with universal services comprising the greater proportion”.³

In the NSW context, we have yet to achieve the desired mix of services. There remains significant disparity between resourcing for tertiary interventions and secondary and universal interventions. Even after adjusting for population size, we now spend significantly more on child protection and out-of-home care than any other State or Territory, while funding for prevention and early intervention has eroded over time. Brighter Futures – once the flagship early intervention program in NSW – now works with clients on the cusp of entering the child protection systems, and no replacement funding has been allocated to early intervention services.

The FACS Discussion Paper states that:

“in addition to ensuring there is an adequate investment in universal and early intervention services... there is a need in the first instance to ensure that the significant existing investment in early intervention and prevention services is well targeted and being delivered efficiently, effectively and flexibly...”

We agree that much can be done to improve the efficiency, effectiveness and flexibility of the existing service system, and outline key issues in Part Two of this submission. However, we consider that the effectiveness of existing investment is likely to be undermined if the system as a whole is not adequately resourced. We therefore recommend that additional funding be injected into community development and early intervention activities as part of this reform process, with the view to reducing the need for spending on more resource intensive interventions over the longer term.

Specifically, we recommend that the NSW Government should increase investment in programs for children, young people, families and communities by \$15 million per annum, in order to:

- Provide children and young people with activities in their communities that they choose, and services that they need, taking into account access issues such as transport;
- Support Aboriginal community controlled organisations to meet the needs of Aboriginal children and young people in their own communities;
- Ensure funding for services matches the needs and aspirations of communities, and fills regional and service system gaps; and
- Prevent crises occurring and reduce the number of children and young people in out-of-home care.

Recommendation 1

Invest an additional \$15 million per annum in activities and programs that ensure children and young people are connected to their families and communities.

² Department of Social Services (2014) [Protecting Children is Everyone’s Business: National Framework for Protecting Australia’s Children 2009–2020](#).

³ Wood, J. (2008). [Report of the special commission of inquiry into child protection services in NSW](#).

SECTION TWO: ACHIEVING THE REFORM AIMS

Aim 1. Improving outcomes for clients of targeted earlier intervention services

We welcome this opportunity to refocus Targeted Earlier Intervention Programs on better outcomes for clients and communities: all the recommendations contained in this submission speak to this aim.

Of critical importance is that work to reform the FACS-funded Targeted Earlier Intervention Programs will lead to better outcomes for Aboriginal and Torres Strait Islander people and communities. To this end, we support ABSEC's proposal to redevelop the Aboriginal child welfare sector in NSW, and the evolution of accredited Aboriginal community-controlled OOHC agencies into holistic Aboriginal child and family services. In addition, FACS should require all service providers to ensure cultural safety for clients and staff via their KPIs and funding contracts. Further, we believe that cultural safety should be enhanced and maintained against a set of relevant standards for meaningful cultural supports, developed by Aboriginal communities.

A key element in improving outcomes for clients and communities is the development of a reporting framework that measures outcomes and tracks change over time. We note that many service providers are already working to measure client outcomes, but that this currently involves reporting and evaluation structures in addition to those required as part of their funding arrangements. We consider that reporting requirements should be streamlined, with greater consistency across programs and between government agencies. In addition, compliance and reporting costs must be taken into account, and must be useful and proportionate within and across programs. One option worth exploring is the recently implemented Department of Social Service Data Exchange framework.

In measuring client outcomes – and using this information to inform decision-making including around the investment of resources – it will be important to take into account issues that have potentially been *avoided* as well as issues that have been *resolved*. Further, any outcomes-based reporting framework should ensure that clients are involved in establishing goals that are realistic and meaningful to them.

Measuring client outcomes alone will not be adequate. FACS should also put in place systems that will facilitate ongoing assessment of whether or not services are reaching the clients who need them most, are adequate to the level of need, and are achieving population-level changes.

Recommendation 2

FACS should work with ABSEC to redevelop the Aboriginal child welfare sector in NSW, and to support the evolution of accredited Aboriginal community-controlled OOHC agencies into holistic Aboriginal child and family services.

Recommendation 3

FACS should require all service providers to ensure cultural safety for clients and staff via their KPIs and funding contracts.

Recommendation 4

FACS should move towards a more streamlined outcomes-based reporting framework that measures the impact of services at both the individual and population levels.

Recommendation 5

FACS should work in partnership with Aboriginal community-controlled organisations to develop meaningful service KPIs that reflect culturally appropriate and holistic service delivery.

Aim 2. Create a service system continuum grounded in evidence-based best practice

The existing service system currently does not provide a continuum of services from early intervention through to child protection services. Two major service gaps in the continuum of child and family services identified in our consultations are support of high need clients who fall below the eligibility threshold for Brighter Futures and support for families with children in care.

High-need clients

Early interventions services report that they are seeing a growing number of referrals from clients who have been subject to risk of significant harm reports but who fall below the eligibility threshold for Brighter Futures. These services are not always equipped or resourced to deal with high-need clients, and providing services to these clients limit their capacity to provide the early intervention services for which they have been funded. If NGOs are to continue to take on high-need clients, they should be appropriately resourced to do so. In addition, capacity building initiatives are required to ensure services have the right skill mix to successfully work with high-need clients.

We are also concerned that NGOs are increasingly being required to carry out child protection services. The *2007 Special Commission of Inquiry into Child Protection Services in NSW* (Wood Inquiry) observed there was a 'conflict of interest exists when the same organisation engages in both child protection and early intervention work'.⁴ There is a need to clarify roles and responsibilities in relation to child protection work, and to ensure that arrangements between Government and the NGO sector work are aligned with the best interests of children, young people and families.

Families with children in care

While support for families with children in care may not fall within the scope of early intervention services, providing support to parents once a child has been removed may make attempts at reunification more successful and help disrupt inter-generational cycles of disadvantage. As a Committee Member for Family Inclusion Strategies Hunter (FISH) told the Senate Inquiry into Out of Home Care:

⁴ Wood, J. (2008). [Report of the special commission of inquiry into child protection services in NSW.](#)

...when your child is removed, there is no support services that will assist you to liaise with FACS and their services. And there are no intensive family support programs available for people who do not have children in their care. I think if there were more of those available—or if there were some available—there would be a better success rate, as well as putting those things in place when children are restored and making sure that people have support outside of what they used to have.⁵

An evidence-informed system

FACS' Sector Consultation Paper refers extensively to the need for evidence-based practice. While strong linkages between research, evidence and practice are of critical importance, strict requirements for a pre-existing evidence base should not discourage innovation, or the tailoring of programs to fit to the local community. As was demonstrated in the roll-out of the Triple P Positive Parenting Program, evidence that a program is suitable in a particular location or for a particular group cannot always be generalised.

We consider that evidence-informed practice, where research guides the design and implementation is more appropriate. Evidence informed practice allows innovation and flexibility in implementation, allowing service providers to better meet the needs of the populations they serve, because they can be implemented in a way that works for the organization, staff, and service population.⁶

Further, we believe it important to support the ongoing evolution of the evidence base, and to continue to support work to identify and disseminate best practice. We know that many organisations are currently doing good work, but we also know that many organisations – particularly smaller ones – have not had the resources to build an evidence base around existing practice.

While we recognize the important work undertaken by peak bodies in research, monitoring and evaluation, we consider there is room for the establishment of a sector led 'Centre for Excellence' focused on identifying and disseminating good practice within the community sector. This could be modeled on the Centre for Excellence and Outcomes in Children and Young People's Services (C4EO) in the UK – a sector led and run initiative that provides a range of products and supports to the children's services sector, including supporting organisations to validate existing practice.

Recommendation 6

If NGOs are to continue to take on high-need clients, they should be appropriately resourced to do so. Capacity building initiatives should ensure services have the right skill mix to work successfully with high-need clients.

Recommendation 7

Roles and responsibilities in relation to working with families subject to risk of significant harm reports should be clarified, with clear guidelines and protocols established to ensure these align with the best interests of children, young people and families.

⁵Senate Economics References Committee (2015) [Out of Home Care](#).

⁶Nevo, I., and Slonim-Nevo, V. (2011). The myth of evidence-based practice: Towards evidence-informed practice. *British Journal of Social Work*, 41, 1176-1197.

Recommendation 8

Resources should be allocated to address gaps in the service system continuum, particularly support for families who currently fall below the threshold for Brighter Futures, and support for families with children who have been removed into care.

Recommendation 9

Requirements for a pre-existing evidence base should not restrict innovation, or the tailoring of programs to fit the local community.

Recommendation 10

FACS should facilitate the development of a centre of excellence modeled on the UK's Centre for Excellence and Outcomes in Children and Young People's Services (C4EO).

Aim 3. Target resources to those with the greatest needs

While we support efforts to provide additional supports to those with the greatest needs, the targeting of resources should not occur at the expense of community development and universal preventative initiatives. We note that although the work of Professor Leonie Segal's work cited in the FACS Discussion paper observes that in general, programs targeting vulnerable populations tend to be more cost-effective, it also advocates for the adoption of a formal priority setting framework rather than providing definitive advice on how limited resources should be invested.

Further, the ARACY *Better system, better chances* Paper commissioned by FACS outlines the ongoing debate regarding the relative cost effectiveness of universal and targeted services.⁷ The paper draws on long-term modelling from the UK that suggests that while targeted investment is need to break the cycle of entrenched disadvantage and trauma, universal systems are needed to sustain the impact of these investments.⁸ The ARACY paper concludes that a proportionate universalism approach that combines universal and targeted interventions is the optimum approach. We support this approach and recommend that universal services be delivered at a scale and intensity proportionate to the level of disadvantage.⁹

⁷ Moore, T.G. (2008). Rethinking universal and targeted services. Parkville, Victoria: Centre for Community Child Health (CCCH) in Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A review of research and practice for prevention and early intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY).

⁸ AFC [Action for Children] and the New Economics Foundation (NEF), 2009) in Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A review of research and practice for prevention and early intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY), p35.

⁹ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A review of research and practice for prevention and early intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY) p 13

Moves to reduce the proportion of funding invested in universal initiatives would run counter to the principles outlined in the National Framework for Protecting Australia's Children, the recommendations contained in the 2007 *Special Commission of Inquiry into Child Protection Services in NSW* (Wood Inquiry), and the recent Senate Inquiry into Out of Home Care.

Recommendation 11

Targeting of resources to those in greatest need should not occur at the expense of community development and universal preventative initiatives.

Aim 4. Facilitate district decision making on the design and delivery of local services

We consider that district decision-making can facilitate the design and delivery of services tailored to local need. Further, this process should result in a more responsive system that can address changing needs and emerging issues within local communities.

However, there is a need to ensure that the delineation of responsibilities between FACS head office and district offices is clearly articulated and well understood. Further, the delegation of decision-making to the district level should not interfere with efforts to streamline processes such as data collection, reporting, referrals, information-sharing and service mapping.

Below, we offer a number of suggestions we consider important to the success of district planning processes.

A cross-agency approach

Local planning processes should aim to break down existing silos between Government agencies involved in providing services to vulnerable clients. We recommend that FACS take a lead role in facilitating the involvement of housing, health, police and education in district-level planning processes, as well as seeking the involvement of other organisations delivering services that intersect with Targeted Earlier Intervention Programs such as universal children's services.

Variation within regions

Although each FACS district is unique, there is also considerable variation within each district and this must be taken into account in planning for the service system. Processes should ensure that representatives from small communities outside major centres have a say in the design and delivery of services, and that the needs of these communities are taken into account during district-level planning processes.

In addition, services must be designed to meet the cultural and linguistic make up of the communities they serve. Aboriginal and Torres Strait Islander people, and people from different cultural backgrounds must therefore be involved in planning processes.

Data-informed planning

Although a significant amount of data is collected by FACS and other government agencies, this data is not always fed back to local communities and services in easily accessible formats. FACS should take the lead in working in a cross-agency manner to ensure local level data – including data collected by contracted service providers – is made available to service providers and local communities. As above, FACS should ensure that

data is made available on a meaningful geographic scale and is reflective of the variation within each FACS district.

Recommendation 12

District-level planning should facilitate the design and delivery of services tailored to local need, resulting in a more responsive service system. They should involve other Government agencies delivering services to vulnerable people and providers of universal children's services. In addition, those involved in planning processes should be representative of the geographic, cultural and linguistic diversity within regions.

Recommendation 13

FACs should ensure local level data collected by relevant Government agencies is made available to service providers and local communities on a meaningful geographic scale that reflects the variation within each FACS district.

Aim 5. Increase flexibility so that clients are at the centre of the system

NCOSS supports the development of a system designed around the needs and preferences of clients. We welcome FACS' commitment to seeking client input into the first stage of the reform process, and consider it vitally important that clients and community members have a say in shaping the design, delivery and ongoing evaluation of the services that support them. We consider that work to develop the systems and processes required to support ongoing engagement with clients and the broader community should continue throughout the duration of the reform period and beyond.

In a client-focused system, children, young people and families would get the support they need regardless of who they are, where they live, and how they seek help. We consider there are three issues that must be addressed in order to move to a client-centred system: streamlined entry points and referral processes; flexibility in service delivery; and an approach to service delivery that considers a client's family and material circumstances.

Streamlined entry points and referral processes

A client-focused system should be built on a "no wrong door approach" whereby clients are referred to the correct service / services regardless of how they first seek help. A number of issues mean that this does not always happen in the current service system.

First, there is a lack of knowledge of services that are available, how they work, and to which clients they might be suited. Although there have been many attempts at service mapping, including information available through HSNNet, the information currently available is not comprehensive or up-to-date. We recommend that FACS lead the development of an easily accessible and searchable database of services, beginning with FACS-funded services, but with a longer-term goal of incorporating other Government- and privately-funded services. Ensuring information is kept up-to-date could be made a condition of new funding agreements. In addition, service providers believe that networking forums such as interagencies provide valuable opportunities to build

relationships between services and ensure coordination and cooperation. As a participant in a recent NCOSS consultation highlighted:

“No wrong door’ is a good concept, but services need to be able to step outside their area and be hooked into a network so they can refer on”

We recommend that any funding model build in resourcing for coordination and networking between services. Second, referral processes must be improved. If a client seeks help from any service, processes should ensure that referral outcomes are tracked in order to reduce the number of clients who fall through the gaps, and to improve referral pathways. Further the development of common referral pathways should aim to reduce the number of times the client must provide different services with the same information. Within the service system, there is a lack of understanding about how client information might be shared between services, while protecting the rights of vulnerable and disadvantaged clients and meeting requirements under the *Privacy and Personal Information Protection Act 1998 (NSW)*. We recommend that FACS develop guidance for services that to assist in streamlining assessment and referral processes.

Flexibility

At present, service providers’ ability to meet the needs of clients is often limited by strict eligibility requirements applied to particular programs. Some people miss out simply because they live in the wrong postcode, are too old or too young, or are struggling with circumstances that do not fit into pre-defined categories. We consider that services should be given greater flexibility to work with people outside strictly defined eligibility criteria.

Services should have the flexibility to place value on client relationship. ARACY paper notes that the benefits of program services will not be fully realised unless the participant is genuinely engaged, listing engagement as “the most critical dimension of early interventions”.¹⁰

Another area in which greater flexibility is required is in relation to the duration of service provision. In many cases services are only available for limited periods of time, dictated by funding levels rather than by client need and evidence about what works. This not only limits services’ ability to achieve good outcomes, but withdrawing support too early can be detrimental to a client’s relationship with the services system and can make a situation worse instead of better. Although it may be more expensive in the short-term to allow for lengthier interventions, if they result in better client outcomes and reduce the number of clients requiring support on multiple occasions, they will reduce costs in the long-term.

Family and material circumstances

Services should be delivered in ways that take the needs of their clients into consideration. Organisations delivering services to people experiencing poverty and disadvantage consistently state that the timing and location of services is critical to their success. This is particularly true if services are to successfully engage hard-to-reach clients who are often the most vulnerable and have the fewest resources to call on. Where relevant,

¹⁰ Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). Better Systems, Better Chances: A review of research and practice for prevention and early intervention. Canberra: Australian Research Alliance for Children and Youth (ARACY), p113.

services should be available in the local community, at locations that are convenient to clients, with childcare, access and transport needs factored into the planning and funding of services.

Where possible, the co-location of services in 'hubs' can support clients – particularly those with complex needs - to access multiple services in one place. In addition, this model of service delivery can facilitate cooperation and coordination between services. Maintaining outreach capacity is also important, especially in order to engage hard-to-reach clients.

Recommendation 14

FACS should continue working to develop the systems and processes required to support ongoing engagement with clients and community members during the reform period and beyond.

Recommendation 15

FACs should lead the development of an easily accessible and searchable database of services and implement processes to ensure information is comprehensive and up-to-date.

Recommendation 16

Resourcing for coordination and networking between services should be built into funding models.

Recommendation 17

FACS should streamline assessment processes, lead the development of common referral pathways and provide guidance to organisations on the transfer of client records.

Recommendation 18

Services should be given greater flexibility to work with people outside strictly defined eligibility criteria, to place value on client relationships, and to work with clients for an appropriate duration based on client need.

Recommendation 19

Services should be made available in the local community, at locations that are convenient to clients, with childcare, access and transport needs factored into the planning and funding of services.

Section Three: Intersection with other service systems

Vulnerable families and children frequently require support from a number of service types, many of which sit outside the scope of this reform. These services, however, can have a major impact on the outcomes achieved by child and family services. Of critical importance is housing, a basic need that must be met before other services can work effectively. Access to specialist support services is also a major impediment to effective service delivery, as is ensuring clients have access to the income support to which they are entitled.

Housing

In our recent pre-budget submission consultations, the lack of affordable and appropriate housing was identified as a key issue in consultation session in every district. Housing clearly plays an important role in shaping long-term well-being, health and developmental outcomes for children, young people and families. Unless families have access to stable and secure housing, they are typically unable to address any other issues. In the words of one of our members:

[without housing] *'people are stuck in crisis and can only stay in survival mode.'*¹¹

Service providers report that a lack of housing is currently a major impediment to the effective delivery of other services to clients. The need to improve access to social and affordable housing is therefore paramount to the success of this reform. To this end, our Pre-Budget Submission (attached to this submission) recommends an extra \$711 million be invested in increasing social and affordable housing stock in NSW, reducing homelessness, and properly maintaining existing social housing stock.

We also note that early intervention services can play an important role in supporting clients to access housing and maintain tenancies, and the interdependencies between these two service systems should therefore be taken into account throughout the TEIP reform process.

Specialist services

The services that fall under the FACS Targeted Earlier Intervention Programs intersect closely with specialist services, and frequently rely on these services to address issues that sit outside the scope of early intervention services. However, long waiting lists and a chronic lack of services are impediments to addressing the needs of children, young people and families in a holistic manner. Our Pre-Budget Submission consultations identified two areas in which there is a critical shortage of services: Domestic Violence and Mental Health. Our recommendations on these issues are attached to this submission. We note that the NSW Government's welcome announcement of a \$60 million package to target perpetrators and support women, men and children who have experienced domestic and family violence will go some way towards addressing our domestic violence

¹¹ Response from participant at NCOSS Pre-Budget Submission Consultation, July 2015.

recommendations, but consider that ongoing monitoring is needed to ensure all families are able to access the support they need.

Early Education

Early education is also a critical enabler of a successful early intervention system. It not only improves outcomes for all children across the whole population, but also provides a pathway through which developmental and other issues can be identified early and families connected into a more targeted service system. More work, however, is needed to ensure that children from disadvantaged families are accessing quality early education services.

As the ARACY paper *Better systems, better chances* states:

Without investment in the universal services, we are unable to 'lock in' the gains made by investment in targeted services. We will have improved outcomes and life chances for today's most vulnerable and at-risk children but we will not have succeeded in preventing the same problems (i.e., poverty, inequality) from having an adverse effect on their younger siblings or their own children (AFC & NEF, 2008, p.22).

Our 1 in 7 Children in Poverty campaign (attached to this submission) recommends that the NSW Government invest significant additional funding in preschool programs to bring NSW into line with other States, and to ensure all children can experience a quality early education from the age of three. For children from low-income families and from Aboriginal and Torres Strait Islander backgrounds, fees should be set at zero.

Centrelink

Many vulnerable children, families and young people receive financial support through Centrelink, but their interactions with this system can be disempowering. Early intervention service providers report that they are frequently required to advocate on behalf of their clients before they can access the support to which they are entitled. This process can be time-consuming and frustrating for both clients and community workers. More work is needed to ensure that clients are treated with respect at every point at which they come into contact with the broader service system, and that all relevant staff are appropriately trained in working with vulnerable children, young people and families.

Other areas for investment

In addition to the initiatives outlined about, our Pre-Budget Submission and 1 in 7 Children in Poverty campaign identified the following as key areas where additional investment is required in order to improve the life chances of all people, including children and families, experiencing poverty and disadvantage:

- \$25 million per annum for the State-wide roll-out of a nurse-led home visiting program for vulnerable families during the first two years of a child's life (listed in the ARACY *Better systems, better chances* paper as a key priority for the early years).¹²
- \$3.2 million for a Healthy Eating: Healthy Living Schools Fund to support schools in specific locations fund programs such as school breakfasts and other healthy food initiatives.

¹² ARACY, note 9.

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- \$15 million for A Disability Inclusion Fund to ensure the representatives of people with disability can work with the NSW Government to make all NSW Government services work for people with disability, deliver on the government's inclusion and participation agenda, and amplify the voice of people with disability in the cultural, social and economic life of our state.
- \$42.7million to improve access to public transport services by expanding investment in new infrastructure and services; make existing infrastructure and stock more accessible for people with disability; lowering fares for people on low incomes and who are unemployed; and supporting Community Transport services.

Full copies of these reports are attached to this submission.

SECTION THREE: REFORM PROCESSES

In addition to our Pre-Budget Submission consultations, NCOSS recently conducted an extensive State-wide consultation with community sector organisations about how government reform, contracting, regulation and other funding processes impact on their capacity to collaborate and provide quality services. The results of this consultation will form the basis of further recommendations to government later this year. This section draws on the results of this consultation in addition to other surveys undertaken or commissioned by NCOSS as they relate to reform processes, communication and procurement and commissioning.

1. *Managing the Reform Process*

Timeframes

Our consultations with the sector highlighted the importance of realistic and appropriate timeframes for reform processes. As KPMG's Going Home Staying Home Post-Implementation Review found, constricted timeframes create undue pressure and risk compromising important relationships¹³. Conversely, long, drawn out processes with no defined end date can create unnecessary uncertainty, contributing to high staff turnover, increased administrative costs and, ultimately, poorer client outcomes. As the following quotation demonstrates:

*'So many organisations are 'crystal balling'. This is costly and time consuming and we are losing time that could be spent developing our organisations to meet funding requirements.'*¹⁴

The FACS TEIP Consultation Paper does not include a proposed timeline for the Reform process. We appreciate that the scope of the reform has yet to be determined and that this will inform implementation timing. However, it would be useful to provide an indicative timeline for the next stages of the reform process that can be revisited if necessary. Milestones should be established in consultation with the sector, to ensure that later stages of the process are planned with sufficient time for organisations to prepare. At every stage, the timeline should ensure adequate timeframes for sector input, involvement and readiness: we commend FACS for the reasonable timeframe given for comment in the first stage of this reform.

In addition, it is important to recognise that services are now operating in a more uncertain environment, and this is impacting service delivery. As an immediate measure, we therefore recommend that organisation be informed by the end of the year whether their contracts will be rolled over into the new financial year.

Recommendation 20

Organisations should be informed of funding arrangements post July 2016 prior to the end of this calendar year.

¹³ KPMG (2015) Going Home Staying Home Post-Implementation Review: 2015 Final Report.
<http://www.housing.nsw.gov.au/NR/rdonlyres/AE1D2227-7A76-457F-B9A8-67744C207A90/0/GHSHPostImplementationReviewKPMG.pdf>

¹⁴ NCOSS, (2013), "NCOSS Sector Development Survey Report 2013", Sydney, p17.

Recommendation 21

FACS should establish an indicative timeline for the next stages of the reform process with milestones developed in consultation with the sector, ensuring that later stages of the process are planned with sufficient time for organisations to prepare.

Communication and consultation

Detailed and timely information is needed throughout the reform process. Our members have made the following suggestions in relation to how the Government should communicate with the sector:

- The rationale for reform should be clearly explained, as should the rationale for decisions relating to the distribution of resources.
- Information regarding changes should be provided a minimum of 12 months prior to implementation to allow for planning and readiness.
- All documentation should include glossary of terms, particularly frequently used terms that have multiple meanings, for example Hub, partnership, early intervention, co-design, innovation and disadvantaged.
- Government agencies should ensure there is coordination in terms of the timing of reform processes, consultation sessions and other events.

Transition planning

If the reform will result in significant changes to service delivery models and/or procurement, transition planning will be essential. Information should be provided well ahead of time, with communication strategies tailored to services as well as clients. If it is anticipated that organisations will be required to formally collaborate (eg form effective, sustainable Joint Working Agreement's, partnerships and mergers) they will require a minimum of 18-24 months to complete the required processes.

In addition, funding and support should be allocated to support organisations to adapt to proposed change. Previous reform processes have demonstrated a need for access to legal support and education in relation to:

- legal structuring
- employment law
- property and assets
- client files / privacy / confidentiality
- governance
- tax
- winding-up.

Smaller organisations in particular are likely to require assistance with capacity building during any transition process. We believe that diversity within the sector is important and should be maintained: a view that was supported by respondents to the State of the Community Sector Survey, as illustrated in the following quotations:

I am concerned that with government spending cuts and constant reforms we will lose a lot of smaller, local community based organisations, their experience and the experience of the staff that work at them. (Large homelessness service)¹⁵

Why does government think that bigger multi-layered organisations are better equipped to deliver on social policy? They are losing the tapestry of the sector. (Small organisation offering non-residential services for the elderly)¹⁶

Recommendation 22

Funding should be allocated to support organisations to adapt to changes arising from the reform process. Particular consideration should be given to the needs of small organisations, with a view to maintaining diversity within the sector.

2. Procurement and commissioning post-reform

As outlined above, collaboration between services is vital in achieving good outcomes for children and families with a wide range of support needs. Procurement processes should therefore be designed to foster collaboration rather than competition. Based on feedback from our members, NCOSS is concerned that the trust and collaborative practices that are key positives of the Sector have been undermined by competitive tendering processes. These positives flourished in the absence of competition and have allowed the Sector to enhance its ability to respond to people's needs while maximising the value of scarce funding. Conversely, competition for funding can lead to distrust and a reticence to share information, collaborate, or refer clients to more appropriate services. Competitive tender processes force organisations to protect their position and support their own sustainability, taking the focus away from their clients and the needs of their community.

In addition, we consider that procurement processes should value and respect local knowledge and expertise. This includes providing a weighting for:

- a proven track record within the community;
- an understanding of the culture of a community;
- knowledge of hidden need;
- the trust that people have in a service ;
- existing relationships that enable person-centred responses; and
- the ability to respond to those isolated by distance, lack of transport or barriers specific to that community.

¹⁵ Cortis, N., & Blaxland, M. (2015). "The State of the Community Service Sector in New South Wales 2015" (SPRC Report 07/2015). Sydney: Social Policy Research Centre, UNSW Australia, p68.

¹⁶ Ibid.

Recommendation 23

Procurement processes should be designed to build on and enhance existing collaboration.

Recommendation 24

Procurement processes should value and respect local knowledge and expertise, allocating a measureable value to these attributes.

We also recommend that once the reform process is complete, FACS should move towards longer-term funding cycles to enable longer-term planning and avoid unnecessary uncertainty. We note that the Queensland Government recently announced that it would begin rolling out five-year funding agreements in order to cut red-tape and provide greater flexibility to the community sector¹⁷.

Recommendation 25

Post-reform, FACS should move towards five-year funding cycles.

¹⁷ QCOSS (2015) Government cuts red-tape with plans to roll-out five-year funding agreements. Available at <http://www.qcoss.org.au/government-cuts-red-tape-plans-roll-out-five-year-funding-agreements-0>