



Brotherhood
of St Laurence

Working for an Australia free of poverty

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Michelle Landry MP
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Dear Assistant Minister,

**Submission to the national public consultation on Implementing the successor plan to the
National Framework for Protecting Australia's Children 2009–2020**

The Brotherhood of St. Laurence commends the Australian Government for their commitment to establishing a successor plan to galvanise national progress towards a substantial and sustained reduction in abuse and neglect.

We are committed to a vision of an Australia free from poverty, a fairer, more compassionate and just society in which all children are raised in safe and loving homes by parents and carers who can fully participate in social, civic and economic life of their communities.

The safety and wellbeing of children is in most cases contingent on the wellbeing of families. For children to thrive, families need economic security, including access to decent employment, fair and adequate social security, affordable housing and, for some, the additional resources to survive family violence.

Regrettably, there is no evidence of a significant reduction in the incidence of child abuse or neglect in the decade since creation of the National Framework. In fact, despite substantial investment in early intervention and targeted family support by state and territory governments, the number of children entering statutory care continues to rise in all jurisdictions.

The successor plan therefore represents a critical opportunity for all Australian governments and community stakeholders to reclaim the ambition of the original Framework and work together with a shared commitment to children's safety and wellbeing.

The Commonwealth must show national leadership as a champion for children's safety and wellbeing. Effective governance, underpinned by strong accountability measures, will be key.

The Commonwealth Government has a special role to play as the national champion for change. Only it can provide the authorising environment to drive real, sustained progress, and only the Commonwealth has the authority to create the governance arrangements and accountability mechanisms required to keep all parties on track, for the duration of the successor plan and beyond.

Guiding principles for the successor plan

We warmly endorse the draft principles set out in the consultation paper and urge the government to consider how these principles will be concretely embedded in the successor plan.

Drawing on our extensive experience working with families as well as our own consultations with other family service providers, we also offer the following insights:

Access to universal and targeted services

Ten years on, there remains an expert consensus that a public health approach, characterised by investment in preventative universal public services and targeted early interventions for families who need extra help, is the most effective strategy for improving the wellbeing of children across the whole population (Higgins 2021; Fox et al. 2015).

We therefore second the recommendation made by Families Australia that the successor plan ‘strengthen the public health approach begun under the National Framework’ (Families Australia 2020, p.7), and urge the government to affirm their commitment to an approach that strengthens the universal safety net alongside more targeted early help for priority cohorts.

We also urge the government to consider the limitations of an approach that relies heavily on targeted intervention at the expense of investment in population-level prevention (PwC 2020, p.v). While refocusing the national policy effort on selected cohorts may appear more cost-effective, there is a risk that focusing too narrowly on ‘high risk’ or ‘vulnerable’ families may divert resources away from universally available services that might help lower-risk families address problems *before* abuse or neglect takes place. There is no jurisdiction, in Australia or internationally, where targeting has successfully reduced the overall incidence of children entering statutory care.

The evidence-based Common Approach Framework or *Nest*, developed by the Australian Research Alliance for Children and Youth (ARACY) for the first National Framework, has already been adopted by the Tasmanian and Queensland governments to facilitate a whole-of-government effort to improve child safety and wellbeing, and offers a ready-made blueprint for the Australian Government to progress a national effort across the states and territories. This framework incorporates six wellbeing domains: being loved and safe; material basics; being healthy; learning; participating; and having a positive sense of identity and culture (ARACY 2013).

A commitment to evidence-informed practice and policy development

We note the findings of both the Department’s own evaluation and the consultation undertaken by Families Australia, that the effectiveness of the National Framework was compromised by a lack of nationally consistent data on the incidence of child abuse and neglect, and the related absence of a rigorous evaluation framework that would have allowed the Commonwealth to hold states and territories accountable for their progress towards the six agreed outcomes (PwC, p. iii; Families Australia, p. 8).

We therefore endorse the following proposals to help create an evidence base for change:

- that the successor plan be based on a robust theory of change that sets a clear direction, articulates desired impacts and ‘maps’ action against achievable and measurable short-term, intermediate and long-term outcomes (Families Australia, p.8)
- that the successor plan adopts an outcomes framework based on a shared vision of what success would look like for target cohorts, with an articulation of short, medium and long-term goals to generate and sustain commitment (PwC, p.vi)
- that the outcomes framework be supported by a measurement framework setting out how and when progress towards achieving these outcomes will be measured (PwC, p.vi)
- that the successor plan include a national prevalence study of child abuse and neglect to set an accurate baseline and then measure progress towards plan outcomes at intervals (PwC, p.vi)
- that an iterative or developmental evaluation be undertaken for the duration of the successor plan to drive effective implementation including early identification of implementation issues (PwC, p.vi)
- that the successor plan establish an independent monitoring and reporting mechanism, with timely public release of measurement data to strengthen accountability – comparable to the Family Matters reporting on the rate of Aboriginal and Torres Strait Islander children in statutory care (Families Australia, p.8)
- further to this, that reporting arrangements ‘tell the story beyond the data’ through periodic online snapshots, case studies and personal stories that engage all stakeholders (Families Australia, p.8).
- that all the above be designed in consultation with relevant experts and stakeholders (Families Australia, p.8).

Strong Aboriginal and Torres Strait Islander involvement in governance and decision-making

We commend the government for committing to a process of co-design with Aboriginal and Torres Strait Islander communities, and strongly endorse the need for First Nations people to have an expanded role in the implementation and ongoing governance of the successor plan.

Listening and responding to the voices of children and young people

We likewise commend the government’s commitment to listen to the voices of children and young people and their families. We urge it to establish a formal mechanism for children and young people with lived experience of child and family services to have a substantive role in oversight of the implementation and governance of the successor plan.

Sustained progress on this issue demands the redistribution of decision-making power away from centralised agencies to the people with the greatest stake in achieving change. To this end we endorse the proposal raised by Families Australia to establish a formal young people’s advisory group as part of the governance of the successor plan, and the opportunity for such a body to build relationships with state youth bodies and coalitions (p.7).

We also direct the government to the example of comparable bodies internationally, particularly the [voice council](#) established as part of [Child Friendly Leeds](#) in the UK, and the ongoing efforts of the Irish child and family wellbeing agency [Tusla](#) to increase child and parent participation in everyday governance activities (Malone & Canavan 2018, pp.49–54).

Accountable, transparent and effective governance

The extent to which the successor plan can create and sustain real momentum for progress will ultimately depend on effective governance and clearly defined accountabilities.

We note the evaluation finding that the effectiveness of the inaugural National Framework was undermined by a lack of accountability. Governance arrangements evolved over time, but weak accountability, combined with the lack of an agreed measurement framework, undermined the collective will to deliver on broader public health outcomes and led to a narrow focus at intergovernmental forums on child protection and family support (PwC p. iv).

Several of the measures described above, including measurable outcomes and publicly reported data, an expanded role in everyday governance for Aboriginal and Torres Strait Islander communities and other stakeholders, will go some way to strengthening the capacity of the community to hold the Government to account, helping to maintain the transparency needed to hold those responsible to account.

However, it remains equally important that the Australian Government help sustain momentum for progress by establishing effective mechanisms to strengthen accountability from above. This will require the active leadership of the Prime Minister, the Minister for Families and Social Services and the Assistant Minister, to create an authorising environment for reform, and effective 'tripartite' governance arrangements that include representatives of Commonwealth, state and territory governments and the National Coalition on Child Safety and Wellbeing.

Responses to selected strategic priorities

Addressing the overrepresentation of First Nations children in child protection

The present codesign process with Aboriginal and Torres Strait Islander communities is an important step towards ensuring that the successor plan adequately represents the aspirations of First Nations families, enables their ongoing role in governance, and sets strong national guidelines to give preference to Aboriginal Controlled Community Organisations (ACCOs) in providing support to Aboriginal families.

However, it is our position that for so long as the special status of Australia's First Nations peoples is not recognised in the Constitution, and Aboriginal and Torres Strait Islander people are denied a national voice, the bitter legacy of centuries of forced dispossession, systemic racism and intergenerational trauma will continue to undermine the safety and wellbeing of Aboriginal and Torres Strait Islander children.

We therefore submit that the most important thing the Australian Government can do to empower Aboriginal and Torres Strait families is to endorse the Uluru Statement from the Heart, and initiate a Makarrata Commission, culminating in the creation of a First Nations Voice enshrined in the Constitution.

We urge the government to consider the words of the Uluru Statement (2017):

The dimensions of our crisis tell plainly the structural nature of our problem. This is the torment of our powerlessness ... When we have power over our destiny, our children will flourish. They will walk in two worlds and their culture will be a gift to their country.

A national approach to early intervention and targeted support for children and families experiencing vulnerability or disadvantage

We urge the Australian Government to consider the extensive range of policy levers at its disposal to help make substantial, material improvements to the safety and wellbeing of children and families experiencing disadvantage, including on migrant visas and seeking asylum.

These levers include its role as the convener of the national successor plan, but also those social services which it administers directly – Centrelink, Medicare, the National Disability Insurance Scheme – as well as the many national agreements and action plans over which it presides, especially the National Agreement on Closing the Gap, the National Plan to Reduce Violence Against Women and the Children, the National Housing Affordability Agreement, and the National Mental Health Strategy.

As the consultation paper notes, the complexity of circumstances precipitating families to need help has increased significantly over the past decade. This is borne out by our own experience, as well as our consultations with other non-government family support providers. Common issues pushing families to crisis point include the lack of affordable housing, difficulty accessing mental health support; lack of access to decent and secure employment, inadequate social security and difficulty navigating the NDIS – all policy areas for which the Commonwealth holds primary responsibility.

A national plan to improve the wellbeing of children experiencing disadvantage must combat poverty

The Australian Government has considerable power to drive far-reaching improvements in the wellbeing of Australia’s children and their families by strengthening the social safety net. This includes more effective support for parents to secure decent employment, but also changes to social security to reduce the incidence of children living in poverty.

Our research highlights the impact of inadequate social security in driving financial stress and higher rates of poverty in single parent female-headed families. By 2017, two-thirds of children in families whose main source of income was Newstart (now JobSeeker Payment) were living in poverty, up from 25% in 1993 (Bowman, Mupanemunda & Wickramasinghe 2021; Bowman & Wickramasinghe 2020).

However, the effectiveness of the Australian Government’s coronavirus response in 2020 demonstrates the real reduction in poverty and financial stress that can be accomplished: Despite increased unemployment during the COVID-19 pandemic, poverty rates for children of single parents fell from 39% to just 17% as a result of the \$550 per fortnight Coronavirus Supplement. Modelling shows that increasing overall social security spending by up to 20% would yield strong benefits in reducing poverty and financial stress when targeted towards working age payments, reducing poverty rates for the recipients by up to 75% (Phillips & Narayanan 2020).

As an immediate measure to reduce number of children living in poverty, we propose a modest 10% increase in social security spending which would increase Jobseeker by \$190 a week (SVA & BSL 2021).

As a longer-term measure we recommend that the Australian Government commission an independent review of the structure and rates of social security payments to ensure that families and children are not exposed to the long-term harmful impacts of living in poverty and financial stress.

Strengthening the interface between service systems across jurisdictions

Governance of the successor plan must enable the Commonwealth to work with states and territories to redesign service systems around the needs and lived experience of children and families

As the complexity of family circumstances has increased, so has the number of service systems with which families experiencing disadvantage must interact. However, most service systems at Commonwealth and state and territory level remain ‘system-centric’: that is, they are designed around the rules of the system – upholding eligibility criteria and funding conditions – rather than the needs and experiences of families.

Our experience working with families, as well as consulting with providers, suggests that much of the time (and therefore funding) allocated to services is tied up in helping families navigate and manage the complex

intersections between systems: a family in crisis may simultaneously require the support of state-based homelessness services and family violence services, while also juggling national mutual obligation requirements and NDIS-funded supports.

We note the evaluation finding that the National Framework failed to deliver on several key objectives. We endorse the recommendation that the successor plan establish a governance structure that enable greater involvement from other relevant portfolio areas (PwC 2020, p.v). But we also go further, to recommend that this governance structure include additional mechanisms to facilitate collaboration between Commonwealth agencies and state and territory departments with a view to redesigning the interface between service systems around the needs of families.

How can the successor plan improve the safety and wellbeing of priority groups?

Groups that deserve particular attention include but are not limited to the following:

Older children and young people aged 10–16 at risk of abuse and neglect

The Brotherhood's research, informed by extensive consultation with providers in the homelessness and youth service sectors and government, suggests that older children at risk of experiencing abuse or neglect tend to be underserved by both early intervention and targeted support services, and that the lack of investment in specialist services for this group is a key driver of homelessness. Furthermore, the failure of state-based out-of-home-care systems to adequately cater to their developmental needs, combined with a lack of specialist homelessness support, means that this group of young people too often end up 'out of home and alone' and vulnerable to further harm (Thornton et al. 2020).

We urge the Australian Government to ensure that the interests of this group are represented in a new national plan and provide the necessary governance arrangements to enable the states and territories to develop specialist service offers for this cohort, in consultation with young people and their families.

We also urge the government to expand its investment in the highly effective early intervention Reconnect service, which currently provides mediation for families of young people who are homeless or at risk of homelessness. We submit that increasing the investment in Reconnect and broadening eligibility to include children and young people at risk of abuse and neglect, has the potential to significantly increase the scope of the early intervention offer for this group and complement state-based supports.

Young people leaving out-of-home care and transitioning to adulthood

While out-of-home-care remains the responsibility of states and territories there is much that the Commonwealth can do as a national champion for youth opportunity to ensure that care-experienced young people have access to the right education and training opportunities to secure decent and sustainable employment as they transition to adulthood.

The COVID-19 pandemic has amplified existing misalignment between youth education and labour market demand, and highlighted existing problems in access, participation and outcomes from education and training. We urge the Australian Government to leverage its authority as the national steward to enable collaboration between jurisdictions and across sectors with the goal of developing a new forward-looking successor to the National Agreement for Skills and Workforce Development and direct them to [our response to the recent Productivity Commission Inquiry](#).

The ongoing work of the National Skills Commission is also critical to address the current misalignment between training policy and labour market needs and we direct the Australian Government to [our recent response to the Care Workforce Labour Market Study](#).

We welcome the opportunity to discuss this submission with you or the Department.

Yours sincerely

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