

15 March 2013

Queensland Child Protection Commission of Inquiry
submissions@childprotectioninquiry.qld.gov.au



Re: Queensland Child Protection Commission of Inquiry Discussion Paper

Life Without Barriers appreciates the opportunity to make a submission to the Queensland Child Protection Commission of Inquiry Discussion Paper.

About Life Without Barriers

Life Without Barriers is a not-for-profit organisation, providing care and support services across Australia in urban, rural and remote locations, and in New Zealand.

Our community-based programs assist children, young people, adults, families and communities. We provide family support and out-of-home care, disability services, home and community care, and support to refugees and asylum seekers. We also work in the areas of mental health, homelessness and youth justice. We have a strong commitment to reconciliation and delivering culturally sensitive programs.

Life Without Barriers provides family support and out-of-home care services to thousands of children and young people across Australia and New Zealand.

Our services range from support to vulnerable families to strengthen and maintain their parenting role, through to foster and residential care for children and young people who are unable to live at home.

Our services also encompass specialised programs to support children and young people in critical areas of development or through major transitions in their lives.

In Queensland, Life Without Barriers' out-of home-care program provides specialist foster care and residential care for approximately 300 children and young people, including eighty Aboriginal and Torres Strait Islander children and young people. Life Without Barriers has a pool of approximately three hundred carer households, comprising a mix of primary and respite carers.

Life Without Barriers also provides short-term, practical assistance to young people aged 15 - 18 yrs transitioning from care through our 'Transition From Care' Program (TFC). Through this program, Life Without Barriers case manages forty five young people who are engaged in the transition process. Life Without Barriers also provides a Supported Independent Living Service (SILS), and a small family intervention service in Brisbane, supporting up to thirteen families.

Introduction

Children and young people in care experience poorer outcomes relative to their age peers in a range of key areas such as health, wellbeing and education¹. Research into young people leaving care²

¹ Victoria Ombudsman, *Own motion investigation into Child Protection – out of home care*, Victorian Government, 2010.

² Alexandra Osborn and Leah Bromfield, *Young People Leaving Care*, Australian Institute of Family Studies, Melbourne, 2007.

has found that they are at risk of negative life outcomes such as unemployment, homelessness and contact with the criminal justice system. Reducing the number of children and young people who enter the child protection system and providing greater stability and permanence for children and young people in care is a shared responsibility that requires a collaborative approach across sectors.

The principles articulated in Life Without Barriers' previous submission to the Queensland Child Protection Commission equally underpin our responses to this current discussion paper:

1. Focus on children

Our child protection system must be designed to provide the best outcomes for children and young people. Child protection is the responsibility of the family, community and the whole of government. We must work collaboratively to design and implement child-focused services and systems.

2. Adopt a systems thinking approach

A systems approach recognises how interrelationships within the system combine in complex ways to influence or shape practice 'on-the-ground'. The value of systems thinking is that it facilitates a focus on whole-of-system transformation, while maintaining attention to the component parts of the intended change. It also enables us to resolve inefficiencies in the design of the system and duplications in effort.

3. An outcomes-focused approach

We must use evidence to inform our activities, to implement programs and develop systems that deliver positive outcomes to children and young people.

4. Promote children's safety within the family and community

Greater connection, collaboration and commitment from across government is needed to prevent children unnecessarily entering the child protection system. Where children and young people do enter care, building capacity within families and communities to be able to safely restore children must remain a focus.

5. Build the capacity of Aboriginal and Torres Strait Islander agencies and communities

Aboriginal and Torres Strait Islander children and young people are significantly overrepresented in the child protection system. Providing culturally appropriate care is fundamental to outcomes for Aboriginal and Torres Strait Islander children and young people who enter care. We must work with and support Aboriginal and Torres Strait Islander agencies and communities to improve our responses to these children.

Recommendations

Recommendation 1: That strategies for collaboration between agencies be explored further, along with alternate funding mechanisms to facilitate this collaboration

Recommendation 2: That the department support and resource collaboration between agencies including modelling of integrated case plans

Recommendation 3: That child protection services in Queensland adopt option 1 as a referral model and that a Child Safety Officer, or at least a child protection liaison officer, sit within the community based intake service

Recommendation 4: That the effectiveness of mechanisms and tools being used in other jurisdictions such of mandatory reporter's guides and Child Wellbeing Units in allied Departments be explored

Recommendation 5: That mechanisms for increasing access to professional advice on child protection matters be explored and developed

Recommendation 6: That reviews of case histories and corresponding agency responses with frequently encountered families be introduced and examined

Recommendation 7: That the effectiveness of mechanisms for compelling repeat users of tertiary services to attend a support program in use in other jurisdictions be further examined

Recommendation 8: That if parents are compelled to attend a support program that it be clearly demonstrated and supported with evidence that a particular program is appropriate to their individual circumstances

Recommendation 9: Safe and timely reunification of children to their families of origin should be a fundamental consideration when working with children in care. Where this is not in the best interests of the child, decisions on alternative placements should be made on a case-by-case basis guided by timeframes

Recommendation 10: Throughout the reunification process, parents should be afforded every reasonable opportunity to meet case plan goals

Recommendation 11: The Child Protection Act should not be amended to include new provisions prescribing the services to be provided to a family by the chief executive before moving to longer-term alternative placements

Recommendation 12: Child protection authorities should be required to demonstrate that a real attempt has been made to engage and support through the provision of services relevant to a families' situation before moving to longer-term alternative placements

Recommendation 13: That careful consideration be given to the potential negative consequences resulting from granting long-term guardianship to people other than the chief executive

Recommendation 14: That where adoption is deemed to be the best placement option, consistent with the best interests of the child, it be more readily available

Recommendation 15: That cultural training for child protection workers be improved by drawing on the expertise of Recognised Entities

Recommendation 16: Young people leaving care should have the choice to engage in continuing case management support from agencies and continued foster care arrangements up to the age of 24

Recommendation 17: Transition from Care programs should be available to all young people leaving care. A review of appropriate policy and legislation should be undertaken to ensure the provision of this program to all young people leaving care

Recommendation 18: That government and the broader sector work collaboratively to build the capacity of Aboriginal agencies

Recommendation 19: That child safety officers be required to hold tertiary qualifications, ideally in social work, psychology or human services

Recommendation 20: That where a child safety officer holds a relevant degree, other than in social work, psychology or human services, that ongoing training and supervision be provided

Recommendation 21: Development of formal mentoring programs for Aboriginal and Torres Strait Islander staff

Recommendation 22: Development of a wider range of additional induction training programs relevant to Aboriginal and Torres Strait Islander staff

Recommendation 23: Development of formal mechanisms to identify, support and transition staff to management positions

Recommendation 24: That Aboriginal and Torres Strait Islander employment targets within Queensland's child protection sector be increased and accompanied by state-wide, concentrated initiatives to recruit Aboriginal and Torres Strait Islander staff and carers into the child protection system

Recommendation 25: That departmental licensing and monitoring requirements and structures be streamlined, and that a review of duplication and inefficiency be undertaken

Recommendation 26: That Government take a strategic and committed approach to early intervention programs. This includes applying an evidence-informed and outcomes-focused approach to early intervention programs that balances the need for early intervention and tertiary child protection initiatives over time.

Discussion

Reducing demand on the tertiary system

1. What is the best way to get agencies working together to plan for secondary child protection services?

It is important to create structures that enable people to identify as part of a team if agencies are to work effectively together to plan for secondary child protection services. Continuity of membership, clear roles, and team leadership are also critical. Life Without Barriers believes the New Zealand model described in the discussion paper shows potential to be applied within the Queensland child protection system and fulfils necessary criteria of defined leadership and a single integrated case plan.

Funding enhancements need to be recognised as a fundamental enabler to supporting collaborative practice.

Recommendation 1: That strategies for collaboration between agencies be explored further along with alternate funding mechanisms to facilitate this collaboration

2. What is the best way to get agencies working together to deliver secondary services in the most cost effective way?

There are a variety of approaches and initiatives that would help foster collaboration between agencies to deliver secondary services. Successful collaboration requires commitment at a strategic level to create referral pathways and clarity around responsibilities between agencies for each aspect of work with a family. To be effective, this approach would need to be reflected at a service agreement level and be supported by the department.

Ideally collaborative approaches would be operationalised by the development of a single integrated case plan for each family across all services. A number of logistical issues would need to be

addressed for this approach to work including: the designation of a lead agency; clarity on the service frameworks agencies would operate under; the maintenance of consistency across lead agencies; and who would have input/accountability for these case plans.

One cost effective option to support agencies to work collaboratively would be to form virtual teams who work with each other under a designated leader who is responsible for ensuring the development of an integrated family plan.

Recommendation 2: That the department support and resource collaboration between agencies including modelling of integrated case plans

3. Which intake and referral model is best suited to Queensland?

Life Without Barriers favours option 1 as an intake and referral model, and in particular its separation of Child Safety and Community based interventions. While this model may take some time for professionals and community members to adjust to, it would mean that families can receive the support that they need without the stigma of being involved with the statutory system, including the opportunity to self-refer. This option also carries the advantage of preventing families coming to the attention of the Department unnecessarily, especially in cases of mandatory reporting.

Within option 1, it seems most beneficial that a Child Safety Officer, or at least a child protection liaison officer, sit within the community based intake service to ensure that families who do require statutory intervention remain visible, and appropriate responses are implemented when needed.

With easily accessible and appropriate tools, professionals and community members would be able to make decisions about which intake service to contact regarding particular families, without confusion, just as there are both emergency and non-emergency contact numbers for the Police.

The geographical size of Queensland presents challenges to any referral system and consideration will need to be given as to how any proposed model will remain effective in regional and remote areas.

Recommendation 3: That child protection services in Queensland adopt option 1 as a referral model and that a Child Safety Officer, or at least a child protection liaison officer, sit within the community based intake service

4. What mechanisms or tools should be used to assist professionals in deciding when to report concerns about children? Should there be uniform criteria and key concepts?

The best guidance for decision making around child protection concerns is having access to a skilled person to discuss proposed courses of action. Mechanisms for facilitating this in practice should be a key component of any proposed model.

Mandatory reporter's guides and Child Wellbeing Units in allied Departments have been utilised in NSW to assist professionals to make decisions around when to report concerns about children. These mechanisms appear to have been useful and their potential for application in Queensland is one option that could be examined further.

Recommendation 4: That the effectiveness of mechanisms and tools being used in other jurisdictions such of mandatory reporter's guides and Child Wellbeing Units in allied Departments be explored

Recommendation 5: That mechanisms for increasing access to professional advice on child protection matters be explored and developed

Investigating and assessing child protection reports

6. How could we improve the system's response to frequently encountered families?

Improving the system's response to frequently encountered families requires cross agency work over longer time periods and preferably with a continuity of staff.

The implementation of regular reviews that closely examine case histories and corresponding agency responses is one approach that may help improve responses to frequently encountered families.

Recommendation 6: That reviews of case histories and corresponding agency responses with frequently encountered families be introduced and examined

7. Is there any scope for uncooperative or repeat users of tertiary services to be compelled to attend a support program as a precondition to keeping their child at home?

This is something that is currently practiced in Western Australia through Responsible Parenting Orders and is being considered by the NSW Government through the potential creation of a mandatory Parenting Capacity Order.

Life Without Barriers supports a mechanism for compelling a parent/s to attend a support program only if it can be first established that the prescribed program is evidence based and effective in the context of the individual family's circumstances.

A number of other considerations must also be taken into account including the capacity of a parent to attend a program (due to factors such as child care or transport); the availability of services in remote areas; whether one or both parents should attend; and whether it may be advantageous for another family member to attend.

People who experience significant disadvantage, such as Aboriginal, CALD, single parents and parents with mental health issues are over-represented in this population group, and can face additional barriers to successfully fulfilling the requirements of a parenting capacity order. Appropriate services and supports that reflect the needs of diverse population groups must exist if there is to be a reasonable likelihood of successful completion of a prescribed program.

Recommendation 7: That the effectiveness of mechanisms for compelling repeat users of tertiary services to attend a support program in use in other jurisdictions be further examined

Recommendation 8: That if parents are compelled to attend a support program that it be clearly demonstrated and supported with evidence that a particular program is appropriate to their individual circumstances

Working with children in care

10. At what point should the focus shift from parental rehabilitation and family preservation as the preferred goal to the placement of a child in a stable alternative arrangement?

Safe and timely reunification of children to their families of origin should be a fundamental consideration when working with children in care. If this is unable to occur, particularly in a timely manner, then the focus must shift to other options such as out-of-home care or another arrangement that is consistent with the child's individual needs and circumstances.

It is of great importance that these two processes do not occur in isolation - stability can be achieved for a young person regardless of the case plan goal by providing a stable and safe placement. The views and wishes of the children and young people should play a key role in determining case plan focus and this can be reflected in practice through mechanisms such as feedback directly from the young person to their CSO, as well as information that they provide to therapists/carers/case managers and other support workers.

While the point at which the focus shifts from reunification to a stable alternative arrangement needs to be decided on a case by case basis, there also needs to be some general guidance regarding time frames. The process of reunification must be timely with all stakeholders including NGOs, Child Safety and parents accountable for tasks in the case plan. Contact needs to be considered for each family, including the location of the contact and the frequency. Contact arrangements should be reasonable and reviewed regularly to ensure that reunification continues to progress.

Throughout the reunification process, parents should be afforded every reasonable opportunity to meet case plan goals, including a range of options for parents and families to achieve case plan goals. The solution has to fit the family and this must remain the key objective in trying to ensure every possible support is provided. Parents need to have access to support service from the beginning of the intervention, and this would ideally continue once children are reunified to avoid preventable re-entry into the statutory system.

Recommendation 9: Safe and timely reunification of children to their families of origin should be a fundamental consideration when working with children in care. Where this is not in the best interests of the child, decisions on alternative placements should be made on a case-by-case basis guided by timeframes

Recommendation 10: Throughout the reunification process, parents should be afforded every reasonable opportunity to meet case plan goals

11. Should the Child Protection Act be amended to include new provisions prescribing the services to be provided to a family by the chief executive before moving to longer-term alternative placements?

Life Without Barriers does not support the Child Protection Act being amended to include new provisions prescribing the services to be provided to a family by the chief executive before moving to longer-term alternative placements. The particular needs of families will vary and there is a reasonable risk that a set of a prescribed services will not be effective in responding to the diverse needs of families. We do not agree that the prescribing of services will necessarily be effective - this proposal does raise the important question of the adequacy of current resourcing and accessibility of secondary support services and these issues should be examined further.

Recommendation 11: The Child Protection Act should not be amended to include new provisions prescribing the services to be provided to a family by the chief executive before moving to longer-term alternative placements

Recommendation 12: Child protection authorities should be required to demonstrate that a real attempt has been made to engage and support through the provision of services relevant to a families' situation before moving to longer-term alternative placements

12. What are the barriers to the granting of long-term guardianship to people other than the chief executive?

There are numerous barriers to granting long-term guardianship to people other than the chief executive including:

- Potential negative impact on maintaining contact with parents and other biological family members. Some Foster carers will be concerned by conflict from the child's family in circumstances where guardianship is held by someone other than the chief executive
- Views and wishes of children and young people may not be fully explored
- A lack of established guidelines regarding what makes someone a "suitable person" or how a CSO may go about gathering information to inform their decision making regarding this
- An absence of financial support when guardianship is given to a third party
- Hesitancy of Courts to make this kind of order due to a preference for reunification
- Issues surrounding accountability in circumstances where guardianship is held by a person other than the chief executive

Recommendation 13: That careful consideration be given to the potential negative consequences resulting from granting long-term guardianship to people other than the chief executive

13. Should adoption, or some other more permanent placement option, be more readily available to enhance placement stability for children in long-term care?

Adoption or other similar placement options should be more readily available to enhance the stability of children and young people in care. The current child protection and adoption legislation does not allow for this, creating significant issues for a number of young people under Life Without Barriers' care in Queensland who have articulated that they would like to be adopted by a carer or family member.

The NSW Government is currently considering legislative reform that will establish a hierarchy of permanency including elevating adoption as a placement option. While Life Without Barriers unequivocally supports a greater emphasis on permanency, placement decisions must reflect what is most consistent with individual circumstances on a case by case basis.

Aside from adoption, Life Without Barriers believes that there is scope to consider other placement options for achieving greater permanency including long-term guardianship to the foster family and administrative permanency within the context of parental responsibility to the Minister. In practice this could be supported by a formal decision by an agency to make the placement with the carer permanent, while maintaining the umbrella of parental responsibility to the Minister to enable ongoing casework and financial support to be provided.

Recommendation 14: That where adoption is deemed to be the best placement option, consistent with the best interests of the child, it be more readily available

14. What are the potential benefits or disadvantages of the proposed multidisciplinary casework team approach?

Life Without Barriers agrees with the potential advantages and disadvantages that are articulated in the Discussion Paper. As a whole we believe the advantages outweigh the disadvantages and this approach should be trialled. For this model to be effective, the roles and responsibilities would need to be clear and lead by an agency or team leader.

15. Would a separation of investigative teams from casework teams facilitate improvement in case work? If so, how can this separation be implemented in a cost-effective way?

The separation of investigation teams from casework teams has benefits such as freeing casework teams from the burden of legislative process and evidentiary affidavits, however it also carries risks. While investigation is a very specialised process within the child protection spectrum, some focus on core casework values is needed to avoid a highly forensic approach. In situations such as when children are subject to assessment orders, it is particularly important that investigation teams remain connected to the fundamentals of the casework approach.

16. How could case workers be supported to implement the child placement principle in a more systematic way?

The Aboriginal Child Placement Principle provides a hierarchy of placement options designed to recognise an Aboriginal child's right to be raised within their culture. Life Without Barriers supports the full adoption and implementation of the Aboriginal Child Placement Principle.

Government child protection workers generally have very basic cultural training. A deeper understanding of Aboriginal and Torres Strait Islander cultures would support these staff to implement the child placement principle in a more systematic way. Developing this understanding requires supervision and training. Supervisors must have the ability to recognise when to seek cultural advice if it isn't routinely incorporated. Moreover, senior managers should have systems in place to monitor these decisions.

Life Without Barriers believes that cultural training for child protection workers would be improved by drawing on the expertise of Recognised Entities as a source of culturally appropriate advice on Aboriginal and Torres Strait Islander child protection matters. As put forward in our previous submission, we encourage the Queensland Government to work closely with Recognised Entities to identify opportunities to strengthen and promote their functions.

Recommendation 15: That cultural training for child protection workers be improved by drawing on the expertise of Recognised Entities

17. What alternative out-of-home care models could be considered for older children with complex and high needs?

There are a limited number of models for older children with complex needs and it is critical to reflect on the fact that they are often only as good as the staff and carers who support and implement them. As such, equal emphasis should be placed on the selection, training and support of staff as on the particular model that is utilised. Current alternative models include:

- Community based housing incorporating onsite case management with workers who have a good understanding of the "system" and positive behavioural support
- Supported independent living. Often these children self place with families and an outreach service that works primarily with the young person, however, also incorporates the family system may be appropriate

18. To what extent should young people continue to be provided with support on leaving the care system?

Life Without Barriers noted in our previous submission to the Commission that it is unrealistic to expect any young person to be entirely independent on the day they turn 18. Young people leaving care - particularly those who may still be in school - face a range of additional challenges including finding stable accommodation and employment, and are often ill-equipped to identify and access appropriate supports.

Ongoing support after leaving care makes a tangible difference to the life outcomes of young people, with research³ finding that the extent to which young people felt secure while in care, and the continuity and social support after care, are the main predictors of positive outcomes 4–5 years after leaving care.

Biological children are supported well beyond 18 in most families. While the provision of support should be determined by the individual circumstances of the young person leaving care, young people who have left care should be able to access practical and emotional support if they so choose. Given that young people often return to their biological family, accessible services should exist to develop their capacity to manage family relationships post-care.

Life Without Barriers' previous submission recommended that young people should have the choice to engage support after leaving care including case management support from agencies and continued foster care arrangements up to the age of 24. We also recommended a review of appropriate policy and legislation be undertaken to ensure transition to care programs are available to all young people leaving care in Queensland. A further recommendation was that a whole of government approach to supporting young people leaving care is required to ensure that available supports do not operate in isolation from one another.

Recommendation 16: Young people leaving care should have the choice to engage in continuing case management support from agencies and continued foster care arrangements up to the age of 24

Recommendation 17: Transition from Care programs should be available to all young people leaving care. A review of appropriate policy and legislation should be undertaken to ensure the provision of this program to all young people leaving care

19. In an environment of competing fiscal demands on all government agencies, how can support to young people leaving care be improved?

Research cited in the discussion paper notes that the lifetime costs of people who have exited the care and protection system (health, housing, unemployment, crime etc) far outweigh the investment required to support young people when they leave care.

Support for young people leaving care can be improved through mechanisms including those discussed in the previous question, and through modest investment in improving awareness and access to existing universal services.

Issues of equity and justice for young people for whom the State has been parent must be considered in relation to this question, and should be a key determinate (along with the relative cost of not providing after-care support) of what an appropriate level of expenditure should be.

20. Does Queensland have the capacity for the non-government sector to provide transition from care planning?

³ Cashmore, J. and Paxman, M. (2006) *Predicting after-care outcomes: the importance of 'felt' security*, Child & Family Social Work, (11) 3.

The non-government sector in Queensland has the capacity to provide transition from care planning as evidenced by Life Without Barriers' and other Transition from Care programs. The flexibility of NGOs; their capacity to provide out of hours service; and their community connections are enablers that make them well placed to provide this service. The capacity of NGOs to provide transition from care planning is dependent on adequate funding, and as discussed above there is evidence to suggest that there is a sound economic rationale to support this investment.

Chapter 7: Addressing the over-representation of Aboriginal and Torres Strait Islander children

21. What would be the most efficient and cost-effective way to develop Aboriginal and Torres Strait Islander child and family wellbeing services across Queensland?

The over-representation of Aboriginal and Torres Strait Islander children and young people in the child protection system occurs due to a complex mix of factors, including the breakdown of traditional Indigenous parental structures resulting from the cumulative negative impacts of the stolen generation, institutionalisation and displacement.

The historical lack of genuine engagement with Aboriginal and Torres Strait Islander people has created a system that is not able to operate in the best interest of Aboriginal and Torres Strait Islander children and young people.

In order to improve outcomes for Aboriginal and Torres Strait Islander children and young people in the Queensland child protection system, it is of vital importance that government and service providers alike work to build the capacity of Aboriginal agencies. For Life Without Barriers, our approach to reconciliation centres on working effectively and responsibly with Aboriginal and Torres Strait Islander peoples, organisations and communities. This approach, guided by our Reconciliation Action Plan (RAP), has helped the organisation deepen its capacity to establish relationships with Aboriginal and Torres Strait Islander peoples and deliver services that are more culturally responsive.

To be effective, Aboriginal and Torres Strait Islander child and family wellbeing services have to be developed on a community by community basis. While this needs to be supported by government and the broader sector, it must come from within Aboriginal communities and hence the resulting models are likely to differ.

Recommendation 18: That government and the broader sector work collaboratively to build the capacity of Aboriginal agencies

Chapter 8: Workforce development

26. Should child safety officers be required to hold tertiary qualifications in social work, psychology or human services?

The notion of opening up child protection roles to those with less than a degree qualification is of concern and will impact on the professional aspects of the role. The education system for example does not consider having non-teaching staff take on a major teaching role. One approach to address the shortage of qualified staff has been to recruit professionals from backgrounds such as teaching and policing into child protection roles, with appropriate training. While it is difficult to evaluate the relative performance of staff from these backgrounds, anecdotally it has been observed that the different philosophical and practice background of these staff can be reflected in practice and decision-making.

Recommendation 19: That child safety officers be required to hold tertiary qualifications, ideally in social work, psychology or human services

Recommendation 20: That where a child safety officer holds a relevant degree, other than in social work, psychology or human services, that ongoing training and supervision be provided

27. Should there be an alternative Vocational Education and Training pathway for Aboriginal and Torres Strait Islander workers to progress towards a child safety officer role to increase the number of Aboriginal and Torres Strait Islander child safety officers in the workforce? Or should this pathway be available to all workers?

While there should be an alternative Vocational Education and Training pathway for Aboriginal and Torres Strait Islander workers to progress towards a child safety officer role, accompanying it would need to be strict attention to overall suitability for this work.

Life Without Barriers' recommendations from the previous consultation to introduce stronger links to training and career development for Aboriginal and Torres Strait Islander staff are equally relevant to this question:

Recommendation 21: Development of formal mentoring programs for Aboriginal and Torres Strait Islander staff

Recommendation 22: Development of a wider range of additional induction training programs relevant to Aboriginal and Torres Strait Islander staff

Recommendation 23: Development of formal mechanisms to identify, support and transition staff to management positions

31. In line with other jurisdictions in Australia and Closing the gap initiatives, should there be an increase in Aboriginal and Torres Strait Islander employment targets within Queensland's child protection sector?

As recommended in Life Without Barriers' previous submission to the Commission, there should be state-wide, concentrated initiatives to recruit Aboriginal and Torres Strait Islander staff and carers into the child protection system. This should be undertaken as a collaborative endeavour between the government and non-government sector, specifically including organisations that are Recognised Entities.

Under Life Without Barriers' Reconciliation Action Plan 2012-2015 the organisation has committed to increasing the number of Aboriginal and Torres Strait Islander staff across all roles and levels by 10 percent over three years. Similar commitments to increase Aboriginal representation in the workforce are being made by NGOs and organisations in other sectors and should equally be pursued in Queensland's child protection sector.

Recommendation 24: That Aboriginal and Torres Strait Islander employment targets within Queensland's child protection sector be increased and accompanied by state-wide, concentrated initiatives to recruit Aboriginal and Torres Strait Islander staff and carers into the child protection system

Oversight and complaints mechanisms

32. Are the department's oversight mechanisms – performance reporting, monitoring and complaints handling – sufficient and robust to provide accountability and public confidence? If not, why not?

33. Do the quality standards and legislated licensing requirements, with independent external assessment, provide the right level of external checks on the standard of care provided by non-government organisations?

36. Do the current oversight mechanisms provide the right balance of scrutiny without unduly affecting the expertise and resources of those government and non-government service providers which offer child protection services?

Current oversight mechanisms are cumbersome, and costly to administer and use. As a result staff spend a disproportionate amount of time making sure they are compliant, rather than focusing on client needs or outcomes frameworks. It is frustrating for qualified professionals to spend such a large proportion of their time accounting for interactions/actions with clients and many staff have reported that the over use of process- driven accountability mechanisms negatively impacts on their job satisfaction. The length of time taken for probity is as a whole too long and this and other processes could be streamlined.

Existing standards, licensing and external assessment have become focused on checks which measure whether a task has been completed or not. What should be being measured is the quality of services and the outcomes that they are achieving.

Life Without Barriers' makes the following recommendations:

Recommendation 25: That departmental licensing and monitoring requirements and structures be streamlined, and that a review of duplication and inefficiency be undertaken, including:

- Consolidating licensing where agencies provide multiple programs across one region
- Using a developmental model of monitoring, where all stakeholders relevant to the client meet to discuss issues and progress as a single point
- Consulting with OOHC services and relevant peak bodies about ways to operationalise the Human Services Quality Framework in respect to the requirements set by child protection legislation and the way in which independent assessment will be conducted
- Reviewing the current system for criminal history and suitability checks for licensed care services, with the goal to reduce waiting times and duplicated systems for suitability approval, and assess the effectiveness of the current system
- Reviewing and implementing updated training and procedures for Community Resource Officers (CRO) to support a more consistent approach to Licensed Care Services across regions.

Chapter 11: Funding for the child protection system

46. Where in the child protection system can savings or efficiencies be identified?

A key mechanism through which significant efficiencies could be achieved within the child protection system is the streamlining of departmental licensing and monitoring requirements and structures, and a review of duplication and inefficiency, as outlined in the above recommendation.

Chapter 12: Conclusion

47. What other changes might improve the effectiveness of Queensland's child protection system?

As noted in the discussion paper there is a growing recognition within government and NGOs of the value of early intervention services. It is also noted that Queensland has historically underinvested in secondary (including early intervention) services, a flaw recognised in past inquiries including the Forde Inquiry and Crime and Misconduct Commission Inquiry.

Life Without Barriers believes that greater focus and investment should be provided to the implementation of effective, evidence-informed, outcomes-based early intervention programs. The purpose of early intervention programs should remain the best interests of children and young people, and be focused on achieving both short and long term outcomes for children and families.

We recognise that there are often competing financial demands placed on government, and that this requires a careful balancing of the need for primary, secondary and tertiary interventions. Investment in early intervention may not result in immediate or short-term cost-savings for tertiary services. Careful consideration needs to be given to the continuum of services required for an effective child protection system.

Recommendation 26: That Government take a strategic and committed approach to early intervention programs. This includes applying an evidence-informed and outcomes-focused approach to early intervention programs that balances the need for early intervention and tertiary child protection initiatives over time.

Thank you again for the opportunity to provide a submission to the Queensland Child Protection Commission of Inquiry.

For any questions regarding this submission, please contact Kristie Brown, National Manager, Public Affairs, Research and Communication: Kristie.brown@lwb.org.au or 02 9508 4133.

Sincerely,



Claire Robbs
Chief Executive