Ms Emma White  
Director General  
Department for Child Protection and Family Support  

Attention – Individual and Family Support Policy Team  
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EAST PERTH WA 6892  
Email: EIFSS@cpfs.wa.gov.au

Dear Emma,

Re: Earlier Intervention and Family Support Strategy Discussion Paper

As Commissioner for Children and Young People in WA I have a statutory responsibility to monitor and review written laws, policies, practices and services affecting the wellbeing of children and young people. In undertaking these responsibilities I must have special regard for Aboriginal and Torres Strait Islander children and young people and for children and young people who are vulnerable or disadvantaged for any reason.

Article 4 of the United Nations Convention on the Rights of the Child\(^1\) clearly states governments have a responsibility to take all available measures to make sure children’s rights are respected, protected and fulfilled. In ratifying the Convention, Australia has agreed to review our laws relating to children and assess the social services, legal, health and educational systems, as well as levels of funding for these services. Governments must help families protect children’s rights and create an environment where they can grow and reach their potential.

I am therefore pleased to provide brief comment on the Department for Child Protection and Family Support (the Department) Earlier Intervention and Family

\(^{1}\) United Nations 1989, Convention on the Right of the Child,  
<www.unicef.org/crc/files/Participation.pdf>
Support Strategy Discussion Paper (the discussion paper) which seeks feedback from stakeholders and service users.

I note the discussion paper and feedback will contribute to the development of an Earlier Intervention and Family Support Strategy (the strategy) which will aim to coordinate how the Department, along with other government and community sector agencies, works with families whose children are most vulnerable to poor life outcomes, including being removed from their parents' care and/or entering the youth justice system. The importance of across government commitment, coordination, resourcing and implementation of evidence informed services and strategies cannot be over emphasised and is indeed essential to achieve meaningful and sustained change to the service landscape in Western Australia.

Consistent with the findings in the Our Children Can’t Wait\(^2\) report of my office, I offer my general support to mechanisms, including development of the strategy, that strengthen collaborative work across government agencies and increase the accountability of all government agencies to provide timely and comprehensive services to children who are vulnerable and at risk, as well as those already in care, and leaving care.

I strongly support the intent of the Department in the discussion paper to, with other government agencies, consider a number of elements to more effectively meet the needs of vulnerable families and young people, including:

- targeting the most vulnerable families at risk of their children coming into care;
- prioritising services for Aboriginal families;
- services being provided by, or in partnership with, Aboriginal people and organisations;
- developing a joint outcomes framework of commonly agreed outcome indicators across government and community sector family support services;
- using data linkage and information sharing to identify families of concern; and
- engaging service providers and users in service design.

Having recently returned from the Kimberley Aboriginal Children in Care forum I am particularly encouraging of the Department to pursue the commitment demonstrated at the forum to work collaboratively with the Aboriginal community to find new ways to more effectively engage Aboriginal families to address the issues that affect the safety and wellbeing of their children and young people. While I believe that the nature of the issues require across government collaboration, given the serious nature of the impact on children and young people it is essential that, mechanisms for achieving such collaboration in practice are established. I am hopeful that the Regional Services

Reform agenda will achieve some progress in this area and I will be monitoring the outcome of this process carefully.

**Parenting programs and services for families**

As noted in the report of this office, “the overall provision of parenting programs and supports across government and non-government agencies remains poorly coordinated and integrated, with gaps remaining in the availability of both universal and targeted parenting programs and supports, depending on geographic location, age of child or young person (from 0 to 18 years) and type of need”. Recommendation 6 of the report calls for

“A detailed assessment be undertaken by government of the availability and effectiveness of existing parenting programs and services in WA and a model of service delivery be developed to support more equitable access to quality parenting advice and support, especially for parents at risk, tailored to children and young people’s key life stages and transition points. This needs to include both universal and targeted support, be culturally appropriate, and across all ages.”

I suggest the development and design of the strategy complement any work of agencies addressing the above recommendation. The discussion paper outlines the family support services of the Department, mentions youth services and parenting services, however its emphasis is on those services provided or funded by the department. Parenting information and support services, earlier intervention and family support services provided across government should be comprehensively assessed and include the development of commonly agreed outcomes indicators.

Whilst the report of my office had a mental health focus, other recommendations specific to vulnerable children and young people are also relevant to the development of the strategy

- More innovative and flexible models of service delivery and support be adopted in regional areas, including wider and better use of technology, local workforce development and funding that takes into account the costs of regional service delivery. (Recommendation 11)
- More culturally appropriate mental health programs and services be provided for Aboriginal children and young people and their families, to be achieved by initiatives such as employing more Aboriginal staff, cultural competency training and the development and implementation of tailored programs and services.

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3 Ibid p. 65.
4 Ibid p. 68.
This must include the full continuum of services, from programs supporting wellbeing, addressing trauma and loss and building resilience, through to early intervention and treatment services, tailored to recognise the importance of culture and healing and to address the impact of intergenerational trauma, particularly for younger ages. (Recommendation 12)

The focus on the Early Years has strengthened across government and the sector in recent years and is positive, however I recommend the strategy also consider access to parenting services for parents in crisis with pre-teen or teenage children. Feedback from members of the community indicate that parents feel they are dismissed by the Department or other service providers when they seek help with older children who are acting out, abusive, violent, or running away. I appreciate the challenges of intervention in these situations, however young people engaging in such behaviour can be at serious risk of harm and effective strategies to intervene need to be developed to reduce this risk.

**Cumulative Harm**

I also recommend the Department and other agencies reflect on the recommendations from the Ombudsman of Western Australia’s own-motion investigation into ways that State government departments and authorities can prevent or reduce suicide by young people. I acknowledge your agency has agreed to the recommendations in the report and note recommendations 9-12 are of particular relevance to the strategy development as they refer to the effects of cumulative patterns of harm on a child’s safety and development including the need for recognition, assessment of and appropriate responses to cumulative harm arising from child maltreatment.

I am aware cumulative harm is noted in the Department’s Neglect Policy and Child Development and Trauma Guide however the importance of recognising, considering and appropriately responding to cumulative harm is vital. Identification of cumulative harm must lead to a service response of some type, the strategy should address how this will occur, and which services will be resourced adequately to provide timely and appropriate services for children and families state-wide at risk of cumulative harm.

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5 Ombudsman Western Australia 2014, *Investigation into ways that State government departments and authorities can prevent or reduce suicide by young people*, Ombudsman Western Australia


7 Western Australian Government, Department of Child Protection 2012 *Policy on Neglect*

8 Western Australian Government, Department of Child Protection (n.d.) *Child Development and Trauma Guide*
Aboriginal Families

Consistent with my response to the Department’s Out of Home Care Consultation paper, and again in view of the recent forum in the Kimberley, I reiterate the responsibility of the State across multiple government agencies to be accountable for support for families. Designing and delivering support services in partnership with Aboriginal communities is to be commended and I am sure the work of the Regional Services Reforms and the Aboriginal Youth Expenditure Review team across government will inform the development of the strategy.

Strengthening the service sector

Efforts to strengthen the service sector should include review of all services, and their adjustment to ensure they are evidence informed, have clearly defined outcomes and well developed implementation strategies.

The input of families and children and young people as service users is also clearly endorsed and encouraged. It is also important to seek feedback from families who currently ‘drop-out of’ or ‘choose not to engage with’ services. The lack of engagement of families may well be linked to issues such as service design, staff skill, or cultural appropriateness.

In respect of individual funding packages, I am not aware of any evidence at this point of the success of this approach in a family support/child protection context and would think that the perceived benefits of individual funding would rely heavily on the assumption that state-wide there are sufficient services to meet the diverse needs of vulnerable children and families, particular where structural and generational disadvantage is a contributing issue. I note that the Victorian Auditor General’s report into the use of individual funding packages in the disability sector in Victoria particularly identified the need for well trained and consistent access to facilitators to assist individuals to identify their service needs and access appropriate sources of assistance, and that individuals with complex needs and those in certain geographical locations were prone to missing out on services.

Sustainability for the funding of services has been particularly raised as an issue in the ability of such services to provide the ongoing, long term strategies required to engage with and effectively address the complex needs of clients. I appreciate that there are a number of reform processes, as previously mentioned, that are currently working on these issues and again encourage the Department to consider these as a matter of priority in any decisions to introduce new models for funding services.

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In closing, I commend you on your initiative to develop a much needed strategy for earlier intervention and family support services.

Yours sincerely

[Signature]

COLIN PETTIT
Commissioner for Children and Young People WA
11 April 2016