
Strengthening lives
and communities

***Response to the South
Australian Child Protection
Systems Royal Commission***

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For further information or enquiries
in regard to this submission contact:

Sue Phillips
General Manager Community Services
Junction Australia
34 Beach Road
Christies Beach SA 5165

Email: sphillips@junctionaustralia.org.au

T: 8392 3000

Champion for the
Charter
of **Rights**
for Children and Young People in Care

BACKGROUND

Junction Australia was established in 1979 and is an independent, not-for profit organisation based in South Australia which provides over 30 community and housing services supporting socially and economically disadvantaged people to move from “Crisis to Connectedness”. The organisation assists over 6,500 disadvantaged people each year and has a proud heritage of dynamically responding to the changing needs and demographics of Australian communities.

Junction Australia (JA) has a long history of providing services for vulnerable children and young people, including:

- Since 1979 JA has been providing 24/7 supported accommodation and case management services for homeless young people in the outer southern suburbs of Adelaide
- Since 2005 JA has been providing 24/7 supported residential care homes for children and young people under the Guardianship of the State Minister responsible for Child Protection. JA currently provides four 24/7 residential care homes for up to 17 children and young people and has been very successful in implementing a therapeutic framework to support staff known as ‘Therapeutic Crisis Interventions’ across these services.

JA is compelled to seek improvement in the child protection system as the present services are under-resourced and unsustainable in an environment of growing need. Some key drivers of this include:

- increasing numbers of children and young people needing child protection services
- declining numbers of kinship and foster carers
- declining investment of resources in child protection services relative to the growing demand
- a disconnect between Government, private & Non-government providers of child protection services
- inadequate focus on early intervention and preventative strategies
- continued use of a ‘behaviour management model’ rather than a best practice ‘therapeutic model’ of care.

Several previous reviews into the child protection system have been undertaken over the past decade, yet many worthy recommendations arising from them have not been implemented.

Based on Junction Australia’s extensive practice-based experience of the current Child Protection System, the organisation respectfully offers the following observations on the way the current systems are operating, together with suggestions for how the system could be improved in the future.

AREAS OF CONCERN

1. The adequacy of existing laws and policies relevant to the State's child protection system for children at risk of harm.

Legislative and Policy focus

The existing laws and policies regarding children at risk of harm are in need of review. The recent statutory focus and the subsequent available resources have increasingly been focussed on crisis intervention and investigation, rather than early intervention and prevention.

Increased focus and resourcing in these areas is needed to deliver better outcomes for children at risk and will also lead to a long-term cost savings for the Government by reducing the level of crisis interventions and investigations.

Previous reviews

Several previous reviews of the child protection system have been undertaken, including (but not limited to):

- Child Protection Review 2003 (Layton Report)
- Keeping them Safe 2004 (SA Government)
- Children in State Care 2008 (Mullighan Enquiry)
- Standards in Alternative Care in SA (2008)
- Directions in Alternative Care in SA 2011 – 2015 (2011)

The implementation of some of the recommendations arising from these reviews has resulted in new or revised child protection mechanisms and standards that have worked well when properly applied.

RECOMMENDATIONS FOR ACTION

2. Improvements that may be made to existing laws, policies, structures and allocation of resources relevant to the State's child protection system for children at risk of harm.

JA supports changes to the current laws and policies that will increase the priority and resourcing for:

- Early intervention
 - Mitigation and management of risk
 - Reunification of families.
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The Child Protection Royal Commission should:

- review the recommendations arising from previous child protection reviews undertaken
- assess progress of their implementation
- ratification of those recommendations still relevant and reaffirmation of those still awaiting implementation

An independent body should subsequently be appointed to monitor and report the implementation of this Royal Commission's recommendations.

AREAS OF CONCERN

Examples of positive initiatives arising from previous reviews include:

- Harboursing Children under the Guardianship of the Minister
- Directives issued by Families SA
- Voluntary Custody Agreements
- 'Guardianship of the Minister until 18 years' (GOM18) orders.

However, despite good intentions a number of recommendations from previous child protection reviews have only been partly implemented or not implemented at all. JA suggests this is due, in-part, to the high turn-over of Senior/Executive staff at Families SA impeding effective follow-through.

Application of the laws

The existing laws and policies themselves are considered to be less of a problem than the inconsistency of their application by statutory and Government bodies. In JA's experience:

- the court system is not applying and enforcing child protection law consistently and effectively as Magistrates often have inadequate understanding of the practical outcomes of their decisions and orders
- Families SA (FSA) is inconsistent and sometimes lax in applying child protection policies and making written directives
- FSA staff are often unable or reluctant to take appropriate child protection action due to being over-burdened with high caseloads and occasionally having their personal safety threatened due to the serious implications of such action
- some mechanisms of the current laws and policies that are of a high potential benefit are not widely utilised. An example of this is 'Other Person Guardianship', which was introduced to give non-family members the right to become legal guardians in order to provide both the carer and child with increased security, stability and access to benefits. However, there is no evidence that Other Person Guardianship is well utilised by Families SA, despite this intention when it was introduced as an option.

RECOMMENDATIONS FOR ACTION

Clear, consistent and effective interpretation and application of child protection laws and policies must be achieved by:

- educating Magistrates regarding the outcomes of court orders and the decisions issued by the court, and introduction of peer review to consider how better outcomes may be achieved
- training and supporting Families SA (FSA) staff to more willingly and consistently issue written directives
- reducing the caseloads of FSA staff to enable full and proper consideration and response to each individual child protection case
- implementing measures to ensure that relevant FSA staff are fully aware of and fully utilise the range of mechanisms available in the current laws and policies, in order to best meet each individual child's/young person's needs.
- Where appropriate, Magistrates to have the option to mandate families to engage with specialist intensive family support services to prevent escalation of issues and stabilise families through improved parenting skills and make lifestyle changes in order to retain care of their children.

AREAS OF CONCERN

Systemic conflict

Under the current laws and policies, Families SA (FSA) is also subject to a systemic conflict of interest that compromises effective early intervention strategies for children at risk. FSA is responsible for providing services for early intervention, but as the statutory authority it is also responsible for the removal of children at risk.

These two roles are 'at odds' and create the risk of flawed decisions that are not in the child's best interests.

A Gap in the system

There is a systemic gap in the current laws and policies affecting young people of around 16 to 17 years of age who are subject to Guardianship Of the Minister 18 years (GOM 18).

Over 80% of young people who are subject to GOM 18 orders voluntarily choose to return to the home from which they have previously been removed. Yet there are no specific resources or processes to ensure that it is safe for them to do so and there is also no formal support mechanism to support an effective reunification with their families at this late stage of the guardianship order. Many of these young people have a cognitive disability or are vulnerable in other ways, due to the trauma and abuse they have experienced.

In the absence of specific resourcing, the level of support provided to young people in this situation varies considerably between Social Workers and in many cases no support is provided at all.

RECOMMENDATIONS FOR ACTION

The current laws and policies be amended to separate the responsibility for the provision of 'early intervention' services from the statutory, decision making authority for the removal of children from their families. To achieve this the responsibility for the provision of early intervention services should be removed from FSA and should be licensed to suitably qualified and experienced NGO's with adequate resources to provide these services. This is currently how this conflict is managed in a number of other Australian jurisdictions.

A systemic change to the laws and/or policy be made to provide a focus and resources to support young people who are subject to a GOM 18 order and who voluntarily choose to return to the home from which they have previously been removed in the late stages of this order. This should include assessment and specialist support to ensure the young person's safety, as well as support for themselves and their families to achieve a successful reunification.

AREAS OF CONCERN

3. The adequacy of existing practices and procedures adopted by Families SA and other relevant agencies, including entities licensed by the Minister, in implementing the State's child protection system for children at risk of harm.

Level of resourcing

A key objective and indicator of an effective child protection system should be a reduction in the number of children at risk who enter this system. A second key objective should be that each individual child receives every opportunity to achieve the best possible outcome in life. The current child protection system is not achieving either of these objectives.

Inadequate resourcing of the child protection system is a key and recurring problem. In an environment of increasing demand, the level of funding for child protection relative to the demand has been in decline since the 1990's. The current child protection system is under-resourced, resulting in unacceptably high worker caseloads and some poor decision making for Families SA staff.

With increasing demand in a resource-poor environment, Families SA largely operates in a short-term 'solutions-based' mode that focusses on immediate or compelling need, rather than focussing on the medium and long-term view of achieving the best outcomes for children at risk.

This has resulted in the allocation of available resources becoming imbalanced, with disproportionately high allocation of resources to crisis intervention and investigation and too few resources being invested in early intervention/prevention strategies. It should be noted that the true cost of failure to invest in early intervention and prevent child abuse leads to higher economic costs in areas including the justice, corrections, education and health systems.

RECOMMENDATIONS FOR ACTION

4. Improvements that may be made to the practices and procedures of Families SA and other relevant agencies, including entities licensed by the Minister, to provide for the best practical and financially achievable implementation of the State's child protection system for children at risk of harm.

A long-term view must be taken to stem and reverse the increasing numbers of children at risk, through a significant 'up-front' investment of resources. These additional resources must be invested into early intervention and prevention strategies, without compromising the resourcing of crisis intervention or investigation strategies in the short-term.

An investment of additional 'balloon' resources in the short-term should be provided to reduce the number of children at risk who access the child protection system, which will subsequently generate long-term savings for the Government in the longer term.

A beneficial outcome of this strategy will be reduced Families SA worker caseloads that will enable greater individual focus, smarter decisions, and better outcomes for children at risk.

AREAS OF CONCERN

There is also a level of wasted resources due to the confusion and inefficiency that arises as a result of inconsistent practices within and across service provider organisations.

Models and practices

At present, child protection services are delivered by three distinctly different and separate sectors:

- The Government sector (principally Families SA)
- Private 'commercial' organisations
- Non-Government Organisations (NGOs)

There are significant disparities in the practices and inconsistency in the service models used by these three sectors.

The Government and Private sectors apply a *Behaviour Management Model* that is designed to 'control' the child or young person, including physical restraint. Practices are focussed on managing disruptive behaviours.

The NGO sector is increasingly moving towards a *Therapeutic Model* that is designed to focus on the 'needs' of the child and to take account of the neurological and psychological effects on the child of the trauma and neglect that they have experienced. Practices are focussed on supporting staff to help the child understand their behaviours and constructively address them accordingly.

Commercial organisations do not operate from any particular model of practice and essentially serve as a 'baby sitting' service, which does not rely on any evidence based model of practice.

In the current child protection system, children move between all three sectors at various times. The inconsistency in practices and service models used will, at best, prevent the optimum outcome from being achieved for the child and, at worst, can be confusing and potentially damaging to the child.

RECOMMENDATIONS FOR ACTION

Uniform and consistent practices and service models must be implemented by all child protection service providers across the Government, Private and NGO sectors.

A Therapeutic Service Model should be uniformly and compulsorily implemented by all child protection service providers, replacing the Behavioural Management Model that is currently in use.

The requisite training should be developed and coordinated.

Cross-sector collaboration necessary to ensure consistency in its application and practices should be recognised, fostered and supported.

AREAS OF CONCERN

Standards

It is the current practice of Families SA to contract the provision of Emergency Care of children at risk to non-government agencies, including private 'for profit' organisations. These organisations provide short term care utilising a range of temporary emergency accommodation options including bed and breakfast properties, holiday homes, caravan parks, rental units and motel-style accommodation, which are not conducive to providing a stable, calm environment to deescalate negative behaviours.

This style of care produces disparity in the standards expected between care providers. Emergency care providers and Families SA, and the accommodation options they use, are not required to be 'licensed' by the Government in the same way that non-government providers are licensed to provide residential care services. One outcome of this anomaly is that these services are not required to formally assess the suitability of the properties used by providers for the purpose of emergency and residential care accommodation in terms of:

- the safety and security of the physical environment
- the size and facilities provided relative to the number of children
- the privacy that the property affords to distressed children
- the suitability of the location.

This is an area of risk to vulnerable children in emergency and long term Families SA accommodation.

It should be recognised that poor quality placements tend to escalate disruptive behaviours which can in-turn constrain the range of future placement options available to each child and most likely escalate the cost of care due to the increased number of children whose only remaining placement options are 'high cost - higher care' service models.

Past approaches have been made by licensed NGO organisations to Families SA to allow them to provide emergency care services and accommodation, but have been declined to date.

RECOMMENDATIONS FOR ACTION

Clearer guidelines and accommodation standards should be developed and implemented for the provision of any type of residential and a formal assessment of all properties used for this purpose should be mandatory, no matter which organisation provides the service.

Suitably experienced and willing NGO organisations should be contracted by Families SA to provide emergency care and accommodation.

The focus of these services should be on quality of outcomes, rather than price as it must be recognised that poor quality and/or failed placements have an adverse and enduring impact upon the life experience of children and young people as it undermines their feelings of self-worth and aspirations.

AREAS OF CONCERN

Collaboration

There needs to be improved communication, collaboration and cooperation between organisations providing child protection services across the three sectors:

- The Government sector (principally Families SA)
- Private 'commercial' organisations.
- Non-Government Organisations (NGO's)

In particular, the present relationship between Government and NGO's is lacking in trust and confidence, and there is reluctance by Families SA to listen to and partner with NGO's.

RECOMMENDATIONS FOR ACTION

Structures and systems that promote and facilitate greater collaboration and cooperation between Families SA and NGO's must be established and supported to foster a true 'partnership approach' to child protection and to enable innovation based on each organisations' strengths.

5 a. The means by which a child who may be at risk of harm is brought to the attention of relevant authorities.

Child Abuse Report Line

The Child Abuse Report Line (CARL) is the principal reporting mechanism by which children at risk are brought to the attention of authorities. This is principally done via a central telephone number, but lower priority situations can now be reported on-line. There has been a significant increase in the number of CARL reports being lodged in recent times.

The CARL system is intended to provide an opportunity for early intervention, but it is simply too under-resourced to do so. Examples of this include:

- it is a common experience for people who are mandated reporters to have to wait 'on-hold' for up to 45 minutes on the CARL telephone service prior to speaking with a person to take the report. For some (such as teachers) this is not possible, and many simply give up

In order to quickly and effectively expedite CARL reports, additional resources should be provided to both the reporting interface (the CARL report phone line and internet facility) and in the assessment and allocation process.

CARL needs access to a wide range of preselected and adequately resourced assessment and early intervention services that can receive referrals in a timely manner and be instigated responsively as required.

AREAS OF CONCERN

- once a CARL report is lodged, it is a common experience that its assessment, allocation and follow-up action take too long, or that no-response or an inadequate response results from a CARL report. There appears to be a bottleneck in the follow up of CARL reports
- both of the above circumstances create disincentives to lodge CARL reports leading, in some cases, to no report being lodged.

It is clear that the CARL report system is under-resourced, and appears to struggle even to effectively address the highest priority 'Tier 1' cases. Meanwhile the Tier 2 and 3 cases, which could benefit from early intervention and stabilisation services to prevent escalation, are not given due consideration nor adequate response.

Homelessness Services interface

There is disconnection between the child protection system and the homelessness system in South Australia which creates a 'gap' through which the care and responsibility for some young people may slip.

A young person in the 15 to 18 years age group who can no longer live at home may access homelessness services, including supported accommodation services, without necessarily being placed under the Guardianship of the Minister. For those young people who are not under Guardianship of the Minister it is difficult for important life decisions to be made as the homelessness service does not have parental rights, the child protection system does not have a guardianship order in place and the legal guardians are not willing/able to accept that responsibility.

RECOMMENDATIONS FOR ACTION

The interface between the child protection system and the homelessness services in SA needs to be reviewed, with a view to ensuring that young people aged 15 to 18 years who access homelessness services have a legal guardian who is authorised, willing and/or able to accept 'parental' responsibility and where necessary make important life decisions on their behalf.

AREAS OF CONCERN

RECOMMENDATIONS FOR ACTION

5 b. The assessment, by relevant authorities, as to whether a child is at risk of harm.

5 c. The assessment, by relevant authorities, about whether to remove, or not to remove, a child from the custody and care of their guardians and to place the child in the custody and/or under the guardianship of the Minister.

Resourcing of Assessment

Given the under-resourcing of the child protection system referred to in previous sections, the process of assessing children at risk of harm is also affected. Thorough and timely assessment creates the opportunity to respond to risk by implementing early intervention and prevention strategies or, when appropriate and necessary, to remove the child.

This is an opportunity that is too often missed due to the time constraints and pressures of high and complex caseloads.

Experience of the Assessors

The most complex 'Tier 1' cases are sometimes assessed by Caseworkers who are inadequately experienced to identify the actual risk of harm to a child. Formal qualifications in Social Work (or related discipline) are often not enough to identify risk and there are significant inconsistencies in assessments between Caseworkers, depending on their experience in the field.

The process and level of resourcing for assessing the circumstances and needs children at risk of harm needs to be increased, in order to:

- shorten assessment response times
- ensure that adequate time and attention is available to Caseworkers to thoroughly assess each child's circumstances.

Assessment resourcing and practice should be amended to ensure that complex cases are only assessed by Senior Caseworkers with appropriate levels of experience in the field.

In addition to this, professional development and supervision focussed on risk assessment should be regularly provided for all Caseworkers, to improve the quality and consistency of their assessments.

AREAS OF CONCERN

5 d. Whether the environment into which a child is placed, either on a short-term or long-term basis, is safe.

Behavioural Management Model vs Therapeutic Model of care

The safety and effectiveness of the environment into which a child is placed is largely influenced by the model of care used.

The model of care that is currently most widely used in SA is a Behavioural Management Model that is designed to 'control' the child or young person and includes physical restraint. Practices are focussed on managing disruptive behaviours, rather than changing patterns of behaviour and helping a young person manage their emotions or reactions.

Increasingly, many NGO sector providers are moving towards a Therapeutic Service Model that is designed to focus on the 'needs' of the child and to take account of the effect on the child of the trauma and neglect that they have experienced. Practices are focussed on helping the child to understand their behaviours and to constructively address them. The therapeutic approach is regarded to be safer and more effective and is widely used in other jurisdictions.

Placement Process

The Placement Services Unit (PSU) in Families SA is responsible for the placement of children into congregate care with an appropriate NGO. The PSU staff undertake detailed assessments of each child and share the information with prospective NGO's in order to ensure the compatibility and safety of the child, the other children in the congregate accommodation and the NGO's staff. NGOs have the right to decline a referral based on the information provided by the PSU if it is assessed that accepting the referral may create an unacceptable risk for the child being referred or cause disruption for other children in existing placements. However, these competing interests create several problems.

RECOMMENDATIONS FOR ACTION

A uniform Therapeutic Service Model should be compulsorily implemented by all child protection service providers and appropriately resourced.

This needs to be accompanied by the requisite training and cross-sector collaboration necessary to ensure consistency in its application and practices.

For Residential Services, adequate resources need to be available to establish and maintain safe, home-like and age-appropriate residential accommodation.

The PSU must ensure that full and frank information is included in all child assessments provided to NGO's for congregate placements, in particular details of high-risk behaviours.

A range of service models and care environments with varying levels of care intensity must be available to PSU in order to ensure suitable placement options available to meet current and projected needs.

Models such as 'Farm-Stay' should be added to the array of placement options available to PSU.

AREAS OF CONCERN

- The PSU is under constant pressure to find placements and the information provided in the PSU's assessments is sometimes inadequate or incomplete. Negative information about some children is sometimes withheld so that an NGO will not decline the referrals of challenging children.
- While the NGOs have the right to decline a referral due to a lack of information, they are pressured by Families SA to accept them. On occasion, NGOs have been told that their future funding may be at risk if they refuse referrals.
- If an NGO accepts a referral in the absence of important information, it can create an unmitigated safety risk to the child, other children, and the NGO's staff.

Secure Care Accommodation

For some children who portray behaviours that create a safety risk, the best and safest option is 'secure care accommodation' in-conjunction with a therapeutic care model, however this option is not available in SA.

Victoria provides a good example of a successful secure care accommodation model. In the Victorian model, children and young people placed in secure accommodation undergo a psychological assessment, a case plan is developed to achieve specific behavioural outcomes and they are cared for in a controlled environment that keeps themselves and others safe, whilst working with a therapeutic care model.

Accommodation Environment

Another factor affecting the safety and effectiveness of the environment into which a child is placed is the physical nature (or the 'feel') of the facility. A physical layout and design that creates a 'home like' environment is far more conducive to safe and effective care than one which has an 'institutional' feel.

RECOMMENDATIONS FOR ACTION

The option of 'Secure Care Accommodation' should be investigated in South Australia to accommodate children and young people who demonstrate high-risk behaviours that make standard congregate accommodation unsuitable. This could be similar to the Victorian model of secure care accommodation and must be underpinned by a therapeutic care model.

Children and young people should only be placed for either short-term or long-term care into appropriate 'home-like' environments that are in-line with the recommendations of the Mullighan Enquiry.

AREAS OF CONCERN

The Mullighan Enquiry made specific recommendations regarding these aspects of care, including limiting the number of children in a single facility to six. Since that time the South Australian government has built and now operates a number of Community Residential Care facilities that house up to twelve children and which have an 'institutional' feel, due to a prison-like design and layout.

Procurement from the NGO sector

The South Australian Government appears to have the perception that there is a lack of options available to place children in an appropriate 'home like' environment and under a 'therapeutic model' of care.

The NGO sector would suggest there are better options than Community Residential Care available via the NGO sector but to date, the Government is unwilling or unable to engage with the NGO sector to discuss and develop these models.

This is in part due to the Government's restrictive procurement and contracting system that prevents NGO's from developing and progressing more positive options in partnership with government. It appears that the issue of 'probity' is constraining the opportunities for government officials to engage in proactive and constructive dialogue with NGOs that have capacity to offer innovative service models.

Risk Assessment of Kinship Care

There appears to be some inconsistency in the level of risk assessment and scrutiny of kinship placements. These placements are not always expected to be consistent with the standards required of family based placements and can place vulnerable children at risk of further levels of abuse.

RECOMMENDATIONS FOR ACTION

The Government could engage with the NGO sector to develop and implement safer and more 'home like' options than Community Residential Care.

Government's competitive procurement and contracting systems could be amended to enable development of best quality options.

Organisations that have demonstrated capacity for provision of high quality services should be encouraged and rewarded for bringing innovative ideas and service models to Government.

Kinship placements should be supported with the essential training and provided with the necessary resources to ensure that expectations in relation to provision of quality care are met. These placements should be regularly monitored and subject to similar levels of scrutiny and assessment as other family based placements.

AREAS OF CONCERN

5 e. The assessment, by relevant authorities, of persons who work and volunteer with children in the custody and/or under the guardianship of the Minister.

Staff and Volunteer screening system

The proper assessment and background checking of persons who work and volunteer with such children is vital in order to manage risk. The process and level of detail checked under in the current Families SA 'National History Screening' system is satisfactory.

However, despite additional resources being allocated, the length of time taken to receive the results is still too long. It appears that this is still a resourcing issue, compounded by the increasing number of checks required. These delays are impacting on the capacity of service providers to engage suitable staff and volunteers as required.

At present, staff and volunteers are required to undergo a Families SA 'National History Screening' every three years, which is too infrequent.

'Unblemished Criminal History' vs 'Good Fit'

The Families SA 'National History Screening' system is designed to check an applicant's criminal history. However a 'clear criminal history' does not equate to a 'good fit' in-terms of working with vulnerable children and young people. The use of psychometric testing in recruit processes enable prospective employers to assess candidate's suitability in-terms of qualities such as:

- personal values
- attitude
- resilience
- response to stress
- cultural awareness.

RECOMMENDATIONS FOR ACTION

The length of time taken to process and provide the results of Families SA 'National History Screening' applications must be reduced significantly to enable organisations to employ staff and engage volunteers in a timely manner.

The Families SA 'National History Screening' checks for staff and volunteers should be required to be undertaken every two years.

The application of consistent psychometric testing should be investigated as an additional tool to assess the suitability of staff and volunteers to work with vulnerable children and young people.

AREAS OF CONCERN

5 f. Management, training, supervision and ongoing oversight of persons who work and volunteer with children in the custody and/or under the guardianship of the Minister.

Standards of professional practice

There are no standards or defined systems for the provision of professional supervision and performance monitoring of staff who work in the field of child protection. Most organisations will undertake this in some form, but there is no consistent and systematic approach.

Regular professional supervision and performance monitoring serve to protect the worker/volunteer, as well as the children and families that they work with. It provides benefits such as:

- reflective practice and practice development opportunities
- critical incident debriefing
- opportunity to identify and correct bad behaviours
- helps to recognise if the staff member has become 'de-sensitised' to risk.

In addition to this most NGOs have a contractual requirement to provide a minimum level of training and professional development for staff, however this is not required of Government agencies.

5 g. The reporting of, investigation of and handling of complaints about care concerns, abuse or neglect of children cared for in the custody and/or under the guardianship of the Minister.

Investigation of complaints about Foster Carers

The investigation of Care Concerns is handled by the Department of Communities & Social Inclusion's Special Investigation Unit (SIU), including complaints made against volunteer Foster Carers.

RECOMMENDATIONS FOR ACTION

Standard professional supervision and performance monitoring practices should be developed and required of all NGO and Government agencies that provide services for vulnerable children.

Government agencies should be subject to the same training and professional development requirements as NGOs.

AREAS OF CONCERN

The manner of investigations by SIU into complaints made about Foster Carers is sometimes characterised as being heavy-handed and insensitive and conducted in a way that assumes guilt. These investigations can also take some time to resolve, leaving carers and the children anxious about the result. This leaves the volunteer Foster Carers feeling ostracised and upset and some Foster Carers who have been found at no fault, have been known to resign as a result of this. This experience also creates a barrier to other potential candidates becoming Foster Carers.

While the importance of due process is acknowledged, in an environment of growing demand but declining Foster Carer numbers, it is critical to handle such investigations in a constructive, sensitive and timely way.

5 h. The staffing of the State's child protection system to ensure the safety of children at risk of harm.

Quality & Quantity of staff

The issue of maintaining adequate quality and quantity of staff resources in an environment of increasing demand is a key issue for organisations but also for the Child Protection Sector as a whole.

The quality of care provided to children and young people is a product of the quality and stability of the workforce that administers the structures and systems and provides the services.

The child protection system is currently experiencing high and increasingly complex caseloads, yet many staff, particularly within Families SA, are subject to the insecurity of 'short term, rolling employment contracts'. This has resulted in high staff turnover due to disaffection, insecurity and frustration. This in turn is leading to inexperienced staff (and in the extreme students on placement) having to deal with complex and high risk child protection cases.

RECOMMENDATIONS FOR ACTION

SIU's investigations of complaints made about volunteer Foster Carers should be undertaken in a constructive, sensitive and timely manner and with due respect to the principle of 'innocent until proven guilty'.

Carers have their names and reputations 'cleared' if investigations do not substantiate the allegations.

A review of Families SA staffing structure and employment conditions is conducted in order to provide stability and security of tenure enabling the employment and retention of appropriately qualified and experienced staff.

To ensure that appropriately experienced staff are dealing with complex and high risk child protection cases, clear guidelines should be established and implemented regarding:

- the minimum amount of child protection experience required by caseworkers to effectively assess and deal with various levels of case complexity and risk
- maximum reasonable caseloads relative to both client numbers and case complexity

AREAS OF CONCERN

Service procurement process

The South Australian Government's procurement and contracting system for child protection services is counter-productive in relation to the quality of services required. Whilst giving public assurances that quality is the driver for decision making when contracting a new service, the child protection system will not publicise the price (or a price range) that they are willing to pay for a particular service. When this approach is coupled with a competitive tendering process it has the effect of forcing potential providers into bidding down to a perceived price point, rather than up to an agreed quality, in order to win the contract.

There also appears to be limited repercussions for those service providers who win a service through a competitive process but fail to deliver that service to the quality and within the timeline stated.

RECOMMENDATIONS FOR ACTION

- ongoing training and professional development opportunities
- access to regular professional supervision
- competitive and secure conditions of employment and remuneration are offered.

Workforce development strategies must be developed and implemented to attract 'the right people' and retain them by providing attractive employment conditions and clear pathways for career advancement.

The upper limit, or a range, for the price of a service should be published when that service is released for tender. This is currently the practice for child protection services in other jurisdictions including Victoria and Tasmania and is also standard practice for other state government departments including Department for Communities and Social Inclusion. This will have the effect of not wasting time on development of service models and submissions that cannot be delivered at that price. The transparency of this approach will ensure that submissions are based around the quality that can be delivered for that stated price, rather than forcing bidders to 'guess' at what government may be willing to pay for an service.

Within the procurement framework, there should be opportunities for innovative unsolicited service models to be presented and considered.

It must be acknowledged that provision of high quality, effective child protection services for children and young people with high and complex needs can be costly and this needs to be appropriately resourced by government.