

Tim Crosier
Branch Manager, Children's Policy
Australian Government Department of Social Services

PO Box 4093
Ainslie ACT 2602
T (02) 6230 1775
F (02) 6230 1704
anglicare@anglicare.asn.au
www.anglicare.asn.au

Via email: NationalFrameworkfeedback@dss.gov.au

26 July 2021

Dear Mr Crosier,

**Implementing the successor plan to the National Framework
for Protecting Australia's Children 2009-2020**

Thank you for the opportunity to offer Anglicare Australia's feedback on the consultation regarding implementing a successor plan to the National Framework for Protecting Australia's Children 2009-2020 (hereafter the Framework).

Anglicare Australia is a unique national network of independent, for purpose community services organisations, all with links to the Anglican Church. In 2019-20 Anglicare Australia's members supported over 5,000 children in out-of-home care services across a range of settings. These include foster and kinship care, residential care, family group homes, permanent care, adoption services, early intervention, and leaving-care support. Our members also provide youth-specific services across Australia, including mentoring, education and training, and specialist youth mental health and homelessness services.

Children need to be protected and nurtured. While the focus of policies and programs relating to child protection necessarily needs to be on individual children and their needs, adequate investment to support children who are struggling or at risk confers a broader social value. It is in the interest of every Australian that supporting Australia's children is given the highest priority.

Endorsed by the Council of Australian Governments in 2009, the National Framework was the first nation-wide plan to respond to child abuse and neglect. Anglicare Australia commends the Plan's public health approach, which focuses on primary or universal initiatives to protect children. The National Plan has been the basis of a collaborative approach between different levels of government and the children and family services sector. There has been additional expenditure on child protection, and some welcome initiatives, including the development and implementation of the National Principles for Child Safe Organisations, and the establishment of the office of the National Children's Commissioner.

Sadly, the rate of children in out of home care has remained stable at about 0.8 per cent of all children, as has the rate of children receiving child protection services, approximately 3.1 per cent of all children. The most concerning figures in child protection data are the rate of Aboriginal and Torres Strait Islander children receiving child protection services, which is 16.6 per cent, up from 15.1 per cent three years ago.¹

Opportunities and priority areas of focus for the successor plan to the National Framework

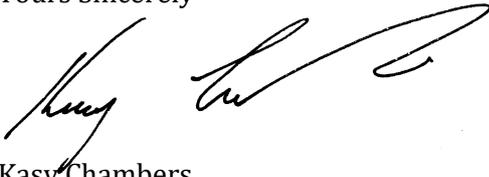
There are opportunities to build on the work of the last decade in the successor plan to the National Framework. The Commonwealth and State and Territory Governments have reached in-principal agreement that the successor plan should focus on several priority groups. These include Aboriginal and Torres Strait Islander children, children and young people experiencing neglect, including children in out-of-home care, and children and young people with disability or parents of children and young people who themselves have a disability.ⁱⁱ This approach is understandable, particularly considering the concerning data and trends for Aboriginal and Torres Strait Islander child protection. Anglicare Australia believes, however, that the focus on universal services must not be lost. A population health, or universal approach, is important. **Universal service provision must underpin any targeted responses.** Beyond the obvious benefits equality in service provision, this approach helps to avoid the stigma that can be associated with targeted services, and helps to ensure that other cohorts of children who are not subject to such targeting of policy and services do not in turn find themselves left behind.

In its evaluation of the National Plan, undertaken by PWC on behalf of the Department of Social Services, PWC noted that “the National Framework was not supported by a robust logic model or evaluation framework which limited its ability to measure its effectiveness”.ⁱⁱⁱ Anglicare Australia commends the Australian Institute of Health and Welfare for its data collection and reporting in this area, however this work would be of greater use to policy makers, not to mention the end users of services — children and their families — were it part of a solid monitoring, evaluation, and learning framework. This should include child-centred data. **Anglicare Australia calls on the signatories to the successor plan to include the development of a clear monitoring, evaluation, and learning framework to be undertaken at the commencement of the successor plan.** This will not necessarily require collection of significant further data, however conducting a data audit once a monitoring, evaluation, and learning framework had been agreed on would be sensible.

The consultation paper lists strengthening child and family sector workforce capability as a priority area. The paper asks respondents about what skills, competencies, and practices are required among workers who support children. It also asks what is needed to prevent high levels of burn out in the sector. **Rather than looking at ways to improve their skills, the first priority should be to increase resourcing for the child and family sector workforce.** Staff across the sector are highly skilled and committed. There are, however, not enough of them. This means unacceptably high caseloads, not enough time with families and children, and contributes to staff burn out.

The successor plan to the National Framework should be linked to other policy initiatives, such as the National Framework for the Prevention of Violence Against Women and Children. Furthermore, a new Framework, no matter how good, will operate in a broader context. There are two areas that significantly impact on children that require more focus and funding from the Australian Government. The first of these is improving housing affordability and decreasing homelessness, and the second is poverty. The Australian Government has both the resources as well as the responsibility in terms of national leadership and ensuring geographic equality across Australia to make significant contributions in these areas.

Yours Sincerely



Kasy Chambers
Executive Director
Anglicare Australia

ⁱ Australian Institute of Health and Welfare (2021) [Child protection Australia 2019-20](#).

ⁱⁱ Australian Government Department of Social Services (2021) [Consultation paper: implementing the successor plan to the National Framework for Protecting Australia's Children 2009-2020](#).

ⁱⁱⁱ PWC (2020) [Department of Social Services Evaluation of the National Framework for Protecting Australia's Children 2009-2020](#).