

Supporting improvements to the Families and Children Activity – Department of Social Services

ACOSS Submission

26 February 2021

About ACOSS

The Australian Council of Social Service (ACOSS) is a national voice in support of people affected by poverty, disadvantage and inequality and the peak body for the community services and civil society sector.

ACOSS consists of a network of approximately 4000 organisations and individuals across Australia in metro, regional and remote areas.

Our vision is an end to poverty in all its forms; economies that are fair, sustainable and resilient; and communities that are just, peaceful and inclusive.

Summary

ACOSS welcomes the opportunity to contribute to the Department of Social Services reform of the Families and Children Activity. Family and relationship support to families and children is critical to ensure that children and families thrive and communities are safe and cohesive.

It is essential that services in the Families and Children Activity be community led, co-designed with people accessing and eligible for the services, collaborative, and informed by the evidence.

Outlined within this document is a series of recommendations that have been informed by the expertise of the ACOSS Community Services Policy Network, and drawn from research and earlier work undertaken by ACOSS, including the most recent Australian Community Sector Survey. The recommendations and commentary focus on the key headings in the discussion paper, specifically outcomes and evidence, certainty and accountability, targeting and accessibility, collaboration and coordination, capability and innovation and recent impacts on service delivery. We look forward to an opportunity to discuss them with you.

Recommendations

- 1.** Include safety as an outcome and/or contextual factor for children and families in the outcomes framework.
- 2.** Adjust how the outcomes in the framework are described so that they are measurable.
- 3.** Directly engage with people and families accessing services to determine whether the draft outcomes framework meets their needs and accords with their aspirations.
- 4.** Provide comprehensive training and support for services on the DEX Partnership Approach.
- 5.** Ask services to detail the evidence that informs their practice, rather than to outline the evidence their practice is 'based on.'
- 6.** Align the broader work on outcomes that the Department is pursuing with the reform of the Families and Children activity.
- 7.** Extend the standard contract term for Families and Children Activity grants to 7 years.
- 8.** Develop a comprehensive and holistic assessment of performance grounded in the outlined principles for monitoring, evaluation and performance improvement.
- 9.** Encourage services to co-design their programs with people accessing or eligible for their services by including appropriate references in activity work plans.
- 10.** Encourage the establishment of sector led, departmentally supported regional service provider fora, fully funded by the Department.
- 11.** Ensure that expansion of the Communities for Children Facilitating Partners model does not result in a reduction in funding for the Children and Parenting Support Services and Budget Based funded services.
- 12.** Ensure that contract and activity work plan deliverables and requirements encourage innovation rather than drive standardisation.
- 13.** Ensure that face-to-face delivery remains a feature of services in scope for this reform.

Outcomes and evidence

ACOSS broadly supports the outcomes framework outlined in the discussion paper. We understand that it will undergo further adjustments through this consultation process and we look forward to seeing an updated version. As part of this process, we suggest two refinements.

Firstly, ACOSS recommends that the outcomes framework more strongly reflect safety as an aim and outcome. Safety is important for children and young people to thrive, to ensure that family relationships flourish so as to build cohesive communities and develop empowered individuals. It is also an important contextual factor to achieve other outcomes.

Recommendation 1

Include safety as an outcome and/or contextual factor for children, families and communities in the outcomes framework.

Secondly, while we broadly support the aims as outlined in the framework, we consider that the language could be adjusted for many of the outcomes. Currently, many of the outcomes would be difficult to measure, and/or are framed more as indicators than outcomes. Adjusting the language would ensure consistency and that services are able to measure the achievement of the outcomes in the framework.

Recommendation 2

Amend how the outcomes in the outcomes framework are described so that they are measurable.

We also understand that this consultation on the framework and other matters is largely targeted at the community sector. Community sector input is of course critical to ensuring that the framework is appropriate. Equally important is the input of the people and families who access services. If the framework is to reflect their needs and aspirations, then those people and families should actively participate in its design. Ensuring that the framework is designed in partnership with service users ensures that they and their expertise are respected.

Recommendation 3

DSS directly engages with people and families accessing services to determine whether the draft outcomes framework meets their needs and accords with their aspirations.

ACOSS sees the partnership approach as an important mechanism for sharing data and information about the outcomes being achieved in communities. We do not support its mandatory application to all services and service systems, particularly where the engagement with the service user is for a single instance of service or the relationship with the provider is only short term in nature. This includes the Families and Children Activity.

It will be important, whether or not this approach is mandated, that adequate support is provided to services so that they are able to implement the approach appropriately. This will mean that in addition to the help desk already established, that training is provided so services are prepared for implementation. We support The Salvation Army's framework for this proposed training, ie that it needs to ensure staff:

- are aware of factors that threaten the integrity of the data
- understand the principle of informed consent
- understand and prevent the risk of subtle and unintended coercion
- guarantee anonymity and confidentiality of data
- use standardised questions and prompts
- make decisions based on respect for the participant and the integrity of the data

Recommendation 4

Provide comprehensive training and support for services on the DEX Partnership Approach.

Further, ACOSS supports asking funded services to outline the evidence informing their service delivery. We consider having an evidence basis for practice as important to ensure that it is rigorous and achieves outcomes for children and families. That said, there needs to be room for innovation in service delivery, and this sometimes means that a service's practice might be informed by the evidence, rather than translated directly from research to practice.

We note that throughout the discussion paper the terms evidence based and evidence informed are used, sometimes interchangeably. They in fact mean two different things.

In a social work context, evidence-based practice refers to a five-stage program design model. The model applies a scientific rationality for practitioners to determine the best practice intervention for a given social problem, considering findings from randomised controlled trials as at the top of a posited hierarchy of evidence that includes a range of different evidence types.

Evidence-informed practice is a more inclusive and interpretive model 'flexible and creative enough to meet the ongoing changing goals, conditions, experiences and preferences of clients and practitioners', enabling services to

innovate and tailor program design to local communities.¹ Evidence-informed practice serves to fill the gap between research and practice – recognising the value of empirical evidence while being mindful that findings from clinically based research may not be externally or ecologically valid in determining the best intervention approach. This more nuanced approach to evidence is particularly relevant where service users include hard to reach populations that lack substantial research in the available literature. As part of an evidence-informed approach, empirical evidence is considered alongside other sources of information also vital to shaping program design – such as the clinical experience of practitioners and the social context of the service user.

Consistently using the term 'evidence informed' rather than 'evidence based' would ensure a clear understanding of what is meant and support innovation in practice.

Recommendation 5

Ask services to detail the evidence that informs their practice, rather than what evidence their practice is based on.

Finally, ACOSS notes the policy and other work that the Department has underway focused on achieving better outcomes. While we understand that this work is still in its formative stage, and that the Community Sector Advisory Group will be briefed on it in due course, to date we only have limited information about it. The broader work on outcomes should complement and align with the reforms in the Families and Communities Activity, a significant component of which relates to outcomes and how they are achieved.

Recommendation 6

Align the broader work on outcomes that the Department is pursuing with the reform of the Families and Children activity.

¹ Nevo, I and Slonim-Nevo, V (2011): 'The Myth of Evidence-Based Practice: Towards Evidence-Informed Practice', *British Journal of Social Work*, 41, Oxford University Press, Oxford.

Certainty and accountability

ACOSS welcomes the department's proposal to implement longer-term grant arrangements, agreeing with arguments made that greater funding certainty is essential to enable service providers to build trust and engagement with people who access services, maintain workforce continuity and improve the quality of service delivery.

ACOSS reiterates our longstanding support² of the Productivity Commission's recommendation to increase the default contract term for family and community services grants to 7 years.³ As the Commission outlines, this contract length provides a level of funding stability that adequately reduces the 'costly distraction' of seeking short-term funding; freeing up community services to reallocate resources to focus on service delivery and improvement and developing the stable relationships with people using services that often underpin a positive outcome.

Further to this, a 7-year contract term would also provide longer periods for evaluation and outcomes measurement, improving our understanding of the quality of service delivery and the outcomes achieved.

Recommendation 7

Extend the standard contract term for Families and Children Activity grants to 7 years

ACOSS agrees with feedback from service providers to the department that performance management and accountability measures will largely rely on client outcomes data reported through the Data Exchange. We welcome the department's commitment to a comprehensive and holistic assessment of performance.

ACOSS has developed a number of principles for the monitoring, evaluation and performance improvement of service providers.⁴ These principles are informed by the literature and the perspectives of ACOSS members and stakeholders.

² ACOSS (2019): [Policy priorities for the next Australian Government: Community Services](#), ACOSS, Sydney.

³ Productivity Commission (2017): [Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services](#), Productivity Commission Inquiry Report, No. 85, 27 October 2017, p 263.

⁴ ACOSS (2018): [Commissioning and Getting Better Outcomes – Principles and Practice](#), ACOSS, Sydney.

Principles for monitoring, evaluation and performance improvement

- **Proportionality** – the level of monitoring should reflect the level of risk associated with the delivery of the service. Low risk and lower cost projects and services should require less monitoring than higher risk or high cost projects and services.
- **Clarity** – the outcomes that service providers are accountable for should be clear and unambiguous, and agreed with the service provider.
- **Respect for the rights of service users** – monitoring and evaluation of services should respect the rights and interests of service users. Monitoring systems and evaluations should be designed to ensure that they do not interfere with the delivery of the service or expose client data to privacy risk.
- **Respect for the perspectives of service users** – the perspectives of the people that use a service should feature in the monitoring and evaluation framework, particularly their perspectives about the quality of the service being evaluated.
- **Respect for service delivery staff** – the perspectives of staff delivering a service on the ground should feature in the monitoring and evaluation framework.
- **Timely** – evaluation and monitoring systems and frameworks should be built and/or established at the outset of a project or when service delivery commences, or in the case of recommissioning, when the recommissioning occurs. While some changes to monitoring and evaluation systems along the way are necessary, commissioners should be careful not to move the goalposts on service providers.
- **Cost** – the costs of monitoring and evaluation should be considered a cost of the service, and included in the funding envelope.
- **Support for innovation** – systems should be built to ensure that innovation is supported, and that risk is managed well rather than avoided entirely.
- **Monitoring of financial performance** – the monitoring of the financial performance of a project or organisation should be kept to the minimum level required to establish the ongoing viability of the project and organisation. ACNC information should be used where possible in order to reduce duplicated reporting.
- **Government Stewardship** – a critical role for government is as system steward. As system steward, government's role extends beyond that of

funder, to one where they are actively involved in shaping the service system so that services that meet the needs of the community are in place. In fulfilling this role, government must develop and deliver a service system improvement and support function, in partnership with the community sector. It is important to note that the sector has views, input and expertise, that if we work collaboratively, can inform government stewardship.

- **Action-Based Research** - Preference should be given to investing in action-based research, including for evaluation purposes, and to ensure that maximum benefit is returned to the communities the subject of evaluation processes, including local services and civil society leadership structures. Monitoring and evaluation should be a part of a development approach to improvement outcomes for communities and individuals, with transparency and accountability back to the public and communities affected.

Recommendation 8

Develop a comprehensive and holistic assessment of performance grounded in the outlined principles for monitoring, evaluation and performance improvement

Targeting and accessibility

ACOSS considers it essential that services are accessible to children and families from a variety of backgrounds, including culturally and linguistically diverse children and families, Aboriginal and Torres Strait Islander children and families, children and families from LGBTI communities and families with diverse configurations. It is also important that services are designed to meet local needs.

The best way of targeting services appropriately is to enable services to co-design programs with the communities and families that use or are eligible to use them. Co-design, when conducted in a way that reflects its true meaning, recognises that people are experts in their own lives and their own communities. It also reduces unintended consequences, and provides insights into how services will be received and used.

Co-design is different from consultation, in that it goes beyond dialogue and discussion to ensure that all stakeholders are actively involved in the design process. The department will need to enable providers to undertake successful and locally-based co-design through funding and other forms of support, including through a comprehensive service needs analysis and demand mapping exercise undertaken in partnership with service providers.

Recommendation 9

Enable services to co-design their programs with people accessing or eligible for their services by including appropriate references in activity work plans.

Collaboration and coordination

ACOSS welcomes the department's commitment to explore with service providers how to work with local communities and ensure service delivery best meets local community needs.

ACOSS also notes the work of the department with the Northern Territory Government and the Northern Territory Children and Families Tripartite Forum. While it is too early to label the initiative a success, there are promising signs emerging from the process.

ACOSS supports mechanisms such as the regional service provider fora suggested by the department in the discussion paper, in order to bring together service providers in a shared region to identify emerging issues impacting service delivery, share learnings, identify service priorities and strengthen collaboration. We do however caution that in order for these fora to be successful it will be important that these mechanisms are sector led, with support from the department. This will ensure service providers feel freer to discuss and engage with colleagues in other services about their challenges without fear that those discussions will lead to performance issues.

Recommendation 10

Encourage the establishment of sector led, departmentally supported regional service provider fora, fully funded by the Department.

Ensuring service delivery is locally responsive requires a deep understanding of the unique contribution small, medium-sized and large community services make within the wider service ecosystem. Mechanisms for collaboration and coordination must account for the distinctive strengths of small, medium and large organisations and safeguard the diversity of the sector that is so crucial to enhancing outcomes. Noting this, it will be important that proposals to incorporate Children and Parenting Support Services and Budget Based Funded services into the Communities for Children Facilitating Partners model are undertaken in such a way that it does not reduce resourcing to smaller agencies, but rather increases resourcing for the activity. At the same time, it will be equally important that organisations delivering services and other functions are embedded in their local areas, with a sophisticated knowledge of their community's strengths and needs and an ability to draw on a workforce of local volunteers.

Recommendation 11

Ensure that expansion of the Communities for Children Facilitating Partners model does not result in a reduction in funding for the Children and Parenting Support Services and Budget Based funded services.

Capability and innovation

In this section, we address a number of barriers to innovation that ACOSS has identified and propose two recommendations to address them.

- **Short-term funding arrangements** – The Productivity Commission has noted that “The lack of certainty (in short-term contracts) inhibits planning, collaboration between service providers, innovation and staff retention⁵.” DSS’ shift to longer-term contracting arrangements for the Families and Children Activity will support innovation.
- **Competition on price** – Driving down the cost of service delivery when agencies are already extremely efficient, and reinvest surpluses in service delivery, stifles innovation and creates a focus on achieving the lowest cost rather than the best outcome for children, their families and their communities. ACOSS supports the contract extensions offered to existing service providers in this round, as a mechanism to avoid significant competitive disruption at a time of policy and practice change.
- **Policy instability** – Constantly adjusting the policy framework that governs the service delivery stifles innovation. ACOSS supports the opportunity for policy stability that this reform, coupled with longer-term contracting and contract extensions provides.
- **Lack of input by people using services** – It is vital that people accessing services or who are eligible for them are engaged in policy and service delivery design. Their insights and input build a better quality service, and also drive innovation. It will be important that activity work plans and contracts encourage services to seek the input of people accessing services in the design and delivery of those services.
- **A drive towards standardisation** – There is a risk that moving to a standard outcomes reporting framework (DEX and SCORE) and a common activity work plan will lead to standardisation of service delivery rather than innovation. It will be important in this context for DSS, via contract and activity work plans, in deliverables and requirements, to encourage innovation rather than drive to achieve standardisation.
- **Lack of resources** – While the complexity of service delivery and the population have expanded over time, there has been little growth in the funding envelope for services in the Families and Children Activity. Growth in funding would build the capacity of organisations to innovate.

Recommendation 12

Ensure that contract and activity work plan deliverables and requirements encourage innovation rather than drive standardisation.

⁵ Productivity Commission (2018): *op. cit.*, p 245.

Recent and emerging impacts on service delivery

In September 2020 ACOSS published a [detailed report](#) on some of the factors impacting the community sector in 2020 as a result of bushfires and COVID-19. The report is based on survey data collected in July 2020 from 744 community sector workers around Australia. Respondents included 201 frontline practitioners, 264 leaders of organisations (CEOs and senior managers) and 279 staff in other roles. The survey explored the ways community sector workers are experiencing the crisis; the changing circumstances and patterns of demand that services are confronting; and how the sector is responding to high levels of poverty, social disadvantage and inequality in the community in the context of the pandemic. The report noted that Australia's community sector has rapidly adjusted its service delivery methods to sustain operations during the pandemic, and to continue to address poverty and disadvantage.

The report highlights significant changes to how services were delivered, with the vast majority of services shifting to remote or online delivery at some point during the pandemic. This highlights the agility of services, and their capacity to rapidly adjust to the needs of the people and families accessing their service and the prevailing conditions. In particular it noted that:

- 96% of respondents reported that their organisations shifted at least part of their service from face-to-face service delivery to other modes.
- 24% of respondents reported that their entire service shifted from face-to-face delivery to other modes.
- 89% of workers experienced some change to their working arrangements. Most frequently this was a change in their location of work: 77% of respondents reported working remotely due to the crisis.

While this agility was important during the initial stages of the pandemic (and remains critical), it is also important that digital or remote delivery is not seen as a long-term replacement for face-to-face delivery.

Digital delivery remains inappropriate for the provision of certain services- and digitally excludes hard to reach populations. For instance, the high cost of broadband creates a cost barrier for low-income households to find and access digital services. For households in the lowest 10% of incomes, around 10% of their disposable income is spent on communications. ACCAN estimates that the cost of communication services means approximately 1 million low-income households are at risk of not switching over to the NBN.⁶ This has substantial implications for the effectiveness of services reliant on digital provision that target households with people who are older, First Nations, live with disability, receive an income support payment or live in a regional area.

⁶ ACCAN (2020): [No Australian Left Offline: affordable broadband for all Australians](#), ACCAN, Sydney.

In addition to cost, vulnerable groups are further excluded by digital services that assume an unrealistic level of digital ability among intended service users- in spite of growing evidence of a widening gap in digital ability between these groups and the average household.⁷ Other key practicalities to consider is the implications that a reliance on digital delivery has for people in households with little to no privacy, as reaching a positive outcome often requires the service user to feel comfortable and safe disclosing personal information.

Recommendation 13

Ensure that face-to-face delivery remains a feature of services in scope for this reform

⁷ Thomas, J et al. (2020): [Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020](#), RMIT and Swinburne University of Technology, Melbourne.

Acknowledgements

ACOSS prepared this submission in consultation with the ACOSS Community Services Policy Network.

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