

**Submission to the Office for Children, Youth and Family Support,
Department of Disability, Housing and Community Services, ACT
Government:**

Discussion Paper on Developing a Service Delivery Framework for
OCYFS funded services working with vulnerable children, young people
and their families

March 2010

Acknowledgement

The Joint Respondents acknowledge the Ngunnawal people as the traditional owners and continuing custodians of the lands of the ACT and we pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of Indigenous children from their families as well as past racist policies and actions continues today.

We acknowledge that the Indigenous people hold distinctive rights as the original people of modern day Australia including the right to a distinct status and culture, self-determination and land. The Joint Respondents celebrate Indigenous cultures and the invaluable contribution they make to our community.

Table of Contents

Acknowledgement	2
Table of Contents	3
1. Introduction.....	4
2. Overarching Comments and Definitions.....	6
3. Recommendations.....	10
4. Background and Context.....	12
5. Response to Focus Area 1: A Robust Secondary Intervention System in the ACT	14
6. Response to Focus Area 2: Collaboration and Service Integration.....	17
7. Response to Focus Area 3: Universal and Targeted Services; and Focus Area 5: Generalist and Specialist Services	19
8. Response to Focus Area 4: Service Reach.....	22
9. Response to Focus Area 5: Generalist and Specialist Services	24
10. Response to Focus Area 6: Service Excellence.....	25
11. Response to Focus Area 7: Child and Young Person Centred and Focused Advocacy.....	29
12. Response to Focus Area 8: Program Outcomes and Performance Measures	32
13. Conclusion.....	34
14. References	35

1. Introduction

This section provides an overview of the services who have endorsed this submission, the process of developing this submission and contact details for further information.

1.1 Joint Respondents

A number of services funded through both the Youth Services Program (YSP) and Family Support Program (FSP) have contributed to the development of, and endorsed this submission, including:

- ACT Council of Social Service;
- Anglicare Canberra and Goulburn;
- Barnardos;
- Belconnen Community Services;
- Canberra One Parent Family Support;
- CatholicCare Canberra and Goulburn;
- Communities @ Work;
- Companion House;
- Families ACT;
- Galilee Inc;
- Gungahlin Regional Community Service;
- Gugan Gulwan Youth Aboriginal Corporation;
- Kippax Uniting Care;
- Lifeline Canberra;
- Marymead Child and Family Centre;
- Northside Community Service;
- Parentline ACT;
- PCYC;
- Relationships Australia Canberra and Region;
- Richmond Fellowship ACT;
- Scouts ACT;
- Southside Community Services;
- St Vincent De Paul;
- The Smith Family;
- Tuggeranong Community Arts Centre;
- Woden Community Service;
- Youth Coalition of the ACT; and,
- YWCA of Canberra.

This submission refers to the above services as the Joint Respondents. The Joint Respondents welcome the opportunity to provide comment and input on the changes to the YSP and FSP, and the ACT Government's commitment to consulting with key stakeholders in the further development of the new framework.

This submission outlines key concerns and considerations from the Joint Respondents, and responds to each of the key focus areas outlined in the Discussion Paper. It should be noted that the response to each focus area has not been constrained by the questions provided in the Discussion Paper.

1.2 Process of Developing this Submission

A number of formal processes were implemented in the development of this submission, which are outlined below:

- On 3 February 2010, the Youth Coalition hosted a forum for YSP and FSP services to provide initial feedback on the Discussion Paper, to inform the Youth Coalition's submission. At this forum, services identified that they would like to collaborate to develop a joint submission from the sector. Additionally, services agreed to participate in further meetings, and to contribute to the development of a joint submission. It was agreed that the Youth Coalition would take a coordinating role in contacting stakeholders, identifying meeting times, and providing a venue to progress the submission.
- An email was sent to all key stakeholders communicating the decision to develop a joint submission, and inviting agencies to participate. It was agreed that participating in the joint submission would not preclude services from developing their own submissions. OCYFS approved an extension on the submission until 19 March 2010.
- A Working Group was established to write the submission, with feedback from broader stakeholders. The Working Group met on 15 February, 24 February and 11 March to work on the submission.
- A broader forum was held on 3 March, to discuss the role of peak bodies in children, youth and family services, which also informed the joint submission.
- The Working Group distributed the joint submission to the Joint Respondents three times during the process, to provide an opportunity for feedback and to contribute to the submission.

1.3 Further Information

If further information on this submission is required, please contact Emma Robertson at the Youth Coalition, on (02) 6247 3540 or director@youthcoalition.net. Ms Robertson will then liaise with the Joint Respondents to provide more information to the ACT Government.

2. Overarching Comments and Definitions

This section of the submission provides a summary of the overarching concerns, comments and considerations relating to the development of the framework, that are shared by the services involved in developing this submission.

2.1 Key Messages

1. Joint Respondents identified that the focus areas included in the Discussion Paper were leading and constrained the consultation process. It was agreed that, had these focus areas been developed in consultation with funded services, a different set of focus areas may have been identified.
2. While Joint Respondents support the alignment of the YSP and the FSP in principle, we share a number of concerns relating to the development of the new framework, and particularly the transition relating to 'inverting the pyramid' of funding provided to primary, secondary and tertiary services. Namely, we are concerned with how the new Framework will support the change in service delivery to early intervention and prevention, whilst supporting the continuum of needs across the community, and recognising the interrelationships that exist between statutory services, government agencies and child, youth and family support services.
3. Programs funded under the YSP and FSP, and services delivered by the ACT Government, work within a broader sector context in the ACT. It is vital that the development of a framework consider the broader sector that delivers services to children, young people and families, including services that are not funded by OCYFS. Services receive funding from a range of sources, including the Australian Government, other ACT Government departments (such as ACT Health, the Department of Education and Training, and Housing ACT), fundraising, philanthropic organisations, corporate sponsorship and private agencies. It is vital that the new program is not viewed in isolation to this very important broader context.
4. Joint Respondents share concerns about a number of key definitions included in the Discussion Paper, including children and young people, early intervention, prevention, vulnerability, and universal and targeted services. We have provided further information below regarding suggested definitions for these terms.
5. Joint Respondents are concerned that the Discussion Paper does not adequately articulate the purpose of the YSP and FSP; or the new alignment. The purpose of the new program needs to be clearly articulated and reflected in the new tenders; and needs to reflect the continuum of service user need in the ACT community, along with the broader ACT service system that supports children, young people and families.
6. Joint Respondents have serious concerns around the implementation of a competitive tendering process under the new program, which may preclude community services from developing effective collaborative models of practice with each other and with government agencies. If the new program has a focus on collaborative modelling, it is vital that additional resourcing for governance of these models be provided to services implementing those models, and that further work be done to support this process, prior to tendering.

7. Joint Respondents commonly noted that the separation between Government services and non-government youth and family workers has a significant impact upon service delivery. For example, through this separation there is a tendency for service users to escalate to tertiary services earlier, and to stay there longer. Acknowledgement and enabling of the role of non-government workers to continue working with service users when they are involved in tertiary services would positively contribute to service users returning to secondary and primary services.
8. Joint Respondents also noted that recognition of the importance of service user endorsed key worker/organisation as primary support and advocate is crucial to reduce time spent in tertiary services, to advocate within it, and to transition both into and out of tertiary services.
9. Joint Respondents agreed that the service delivery structure, values and process will be best built within a human rights framework that ensures service users have the opportunity to inform all processes.
10. Joint Respondents agreed that it should be acknowledged that they work within a strengths based framework that focuses on early intervention and prevention. We are concerned that service users experience significant barriers to accessing services based on the degree of complexity of the issues they experience (for example, a service user not being able to access a relevant service until they reach crisis).
11. Although Joint Respondents understand there is no additional money for this program, in the long term, due to the growth in demand from service users with complex needs, further financial investment will need to be made.

2.2 Key Definitions

It is critical in this new environment to create clarity and common understandings across the service system and government agencies. Joint Respondents identified that a number of definitions within the Discussion Paper are inadequate and require further work.

These definitions include:

- Children and Young People;
- Early Intervention;
- Prevention;
- Vulnerability; and,
- Primary, Secondary and Tertiary Services.

It is very important that the ACT Government work to develop definitions for these terms, in consultation with the community services sector, as they underpin the development and implementation of the new funding stream. The Joint Respondents' discussion in relation to these key definitions is outlined below.

Children and Young People

Joint Respondents identified the need to expand the definition of children and young people as outlined in the Discussion Paper. It was expressed that the definition provided does not include pre-natal development, of children prior to birth. In addition, there was concern that the Discussion Paper focuses on children and young people aged 0 – 17, which does not account for young people aged 18 – 25. Young people aged 18 – 25 are a discrete group which may experience specific needs and unique transition points compared to other age groups of children and young people.

Services identified that there needs to be a significant emphasis on young people aged 17 – 18 years, as the transitions young people experience during this time can be critical. The recent changes in the educational attainment requirement highlight the importance of supporting this group.

It is imperative that the definition of children and young people include a key focus on young people aged 17 – 18 years, and 18 – 25 years of age.

Early Intervention

It was identified that 'early intervention' is a term that has multiple meanings and can be used in varied contexts and environments. The Discussion Paper refers to early intervention as 0 – 17 years, and in relation to care and protection. Joint Respondents agreed that this definition is too narrow. It was identified that early intervention should be viewed as both 'early in the life of the problem'; and, 'early in the life of the child and young person'. It was discussed that both children and young people experience specific challenges and transitions that require early intervention support. In addition to children and young people aged 0 – 17 years, young people aged 18 – 25 are likely to experience significant transition points, such as entering tertiary education or moving to independent living.

Prevention

Joint Respondents agreed that 'prevention' is specifically about preventing the development of risk factors. Prevention can sit at primary, secondary and tertiary levels, although would look different at each level. For example, prevention at a primary level may target whole population groups (e.g. health promotion). Prevention at a secondary or tertiary level may target specific population groups (e.g. Needle and Syringe Programs). Joint Respondents also noted that 'diversion' can sit within a prevention model.

Vulnerability

Joint Respondents identified that the definition of 'vulnerability' provided in the Discussion Paper is too broad and encompasses the entire population of children, young people and families, at some point in time. It is also not consistent with other ACT Government definitions of vulnerability. For example, ACT Health's consultation paper on a *Working with Vulnerable People Checking System for the ACT* defines vulnerable people as those who do, or are likely to, access the service system. Additionally, Joint Respondents identified that the *Vulnerable Families Steering Group* refers to vulnerable families as those requiring high level and intensive support.

Joint Respondents recommended that the ACT Government adopt a model similar to the Victorian model of vulnerability as outlined in the Vulnerable Youth Framework Discussion Paper.¹ Although this model specifically relates to young people, we agree that it could be adapted to be relevant to children, young people and families.

Joint Respondents identified that the ACT Government needs to identify the stages, and circumstances, that can create enhanced vulnerability for children, young people and families. The evidence indicates that particular population groups are at a much higher risk of vulnerability (such as Aboriginal and Torres Strait Islander children, young people and families) and should be included in the definition.

Primary, Secondary and Tertiary Services

For the purposes of this submission, Joint Respondents agreed on the following definitions relating to the level of intervention at which child, youth and family support services operate.

- Primary Services: 'Universal' services targeted at whole population groups. Services operating under this intervention level could include the education system or general health services.
- Secondary Services: 'Targeted' services that work with specific population groups, including services funded under the YSP and FSP.
- Tertiary Services: Highly targeted services that work with specific individuals, including non-government and government services, funded under the YSP and FSP. Statutory agencies such as Care and Protection Services, Youth Justice and Turnaround also operate at this level.

Recommendation 1

That OCYFS ensure that the new Framework is contextualised in relation to the broader service system in the ACT that provides services to children, young people and families.

Recommendation 2

That the new Framework defines 'children and young people' as aged 0 – 25 years, including pre-natal development, and ensuring young people aged 18 – 25 are included in this primary target group.

Recommendation 3

That the new Framework defines 'early intervention' as being both 'early in the life of the problem', and, 'early in the life of the child or young person'.

Recommendation 4

That the new Framework adopt a definition of 'vulnerability' similar to the Victorian model outlined in the Vulnerable Youth Framework Discussion Paper.

3. Recommendations

This section provides a summary of the recommendations put forward by the Joint Respondents.

Recommendation 1

That OCYFS ensure that the new Framework is contextualised in relation to the broader service system in the ACT that provides services to children, young people and families.

Recommendation 2

That the new Framework defines 'children and young people' as aged 0 – 25 years, including pre-natal development, and ensuring young people aged 18 – 25 are included in this primary target group.

Recommendation 3

That the new Framework defines 'early intervention' as being both 'early in the life of the problem', and, 'early in the life of the child or young person'.

Recommendation 4

That the new Framework adopt a definition of 'vulnerability' similar to the Victorian model outlined in the Vulnerable Youth Framework Discussion Paper.

Recommendation 5

That OCYFS consider the specific needs and issues experienced by children, young people and families outlined in Section 4.3 of this submission; in the development of the Framework.

Recommendation 6

That OCYFS support the development and implementation of workforce development initiatives in the new Framework.

Recommendation 7

That OCYFS identify strategies to improve the engagement of the primary service system with secondary and tertiary level services, in the development of the new Framework.

Recommendation 8

That OCYFS identify strategies by which to strengthen working relationships between primary, secondary and tertiary level services; and their service delivery responses to children, young people and families, in the development of the new Framework.

Recommendation 9

That OCYFS identify strategies to respond to service gaps for Aboriginal and Torres Strait Islander children, young people and families, in the development of the new Framework.

Recommendation 10

That OCYFS aim to address the service gap for children aged 8 – 12 years in the development of the new Framework, and seek additional funding to resource this.

Recommendation 11

That if the new Framework is to have an increased focus on collaboration, integration, and consortium style models, adequate time and resourcing is provided to support this process, during planning, establishment and maintenance of these activities.

Recommendation 12

That the new Framework build in flexibility to respond to emerging, changing and long-term needs of children, young people and families.

Recommendation 13

That the new Framework seek to achieve a balance between outreach, centralised services, and regionally based service models for children, young people and families.

Recommendation 14

That the new Framework seeks to improve service pathways for children, young people and families in navigating the service system.

Recommendation 15

That the new Framework seeks to employ a multi-faceted and flexible approach to engage 'hard to reach' service users, that address barriers to accessing services.

Recommendation 16

That the new Framework seeks to implement strategies by which to ensure service reporting contributes to developing an evidence-base for the ACT.

Recommendation 17

That OCYFS undertakes social and demographic profiling of children, young people and families in the ACT to inform the development of the new Framework.

Recommendation 18

That OCYFS ensure that peak activities are adequately funded under the new Framework.

Recommendation 19

That OCYFS support key stakeholders to continue longer-term discussions around peak structure for children, youth and family support services.

Recommendation 20

That OCYFS clearly articulate the aims and objectives of the new Framework, prior to identifying program outcomes.

Recommendation 21

That the new Framework seeks to align with other ACT and national processes relating to measuring program outcomes.

Recommendation 22

That the new Framework build in flexibility, resourcing and longer term outcomes into reporting requirements for services.

4. Background and Context

This section of the submission provides background and contextual information that should inform the alignment.

4.1 Social Context

The YSP and FSP provide a continuum of support services to children, young people and families in the ACT. These services address the broad spectrum of needs within the community that range from primary services right through to support at the tertiary end of the spectrum. The new framework for the program will need to maintain a balance in services across the spectrum but with a particular emphasis on early intervention and prevention. The framework will need to articulate an agreed definition of early intervention and prevention.

It is vital that the merging of the YSP and FSP be framed within the unique ACT social and demographic context. Canberra does not have 'localised' areas of social and economic disadvantage; rather, children, young people and families experiencing disadvantage are dispersed throughout the community. Areas of greater concentration of social and economic disadvantage that have been identified through various indices are concentrated around high-density public housing and in some of the outer suburbs.

Although the ACT is relatively small it is important to create easy access to services for service users, which requires some aspects of service delivery to be regionalised with a significant capacity for the delivery of outreach services. It is difficult to compare social and economic disadvantage in the ACT with that in other Australian jurisdictions. The Canberra Social Atlas in 2006 identified 22,206 households with a gross weekly income of less than \$650. The ACT has the highest average weekly income in the country and evidence suggests that the experience of poverty and disadvantage is compounded when living alongside other much wealthier community members. This presents challenges for the provision of services to children, young people and families as the social and economic disadvantage gap is wider.

4.2 The Children, Youth and Family Services System

Over the last 5 years, the community service sector within the ACT and Australia have explored and implemented new innovative service delivery models based on developing collaborative practice between services and sectors. The family support sector has been engaged in learning from recent national and international innovations around integrating services to families, in particular, reforms in Victoria and the United Kingdom. The youth sector in the ACT has been engaged for a number of years in discussing and developing models of practice for youth work; and in implementing sector development and policy activities.

4.3 Equity in Service Delivery

Joint Respondents highlighted the importance of certain population groups of children, young people and families receiving targeted support through the alignment. These include:

- Aboriginal and Torres Strait Islander children, young people and families;
- Children, young people and families who are homeless or at risk of homelessness;
- Children, young people and families affected by alcohol and other drug issues;
- Children, young people and families affected by mental health issues;
- Children, young people and families with or affected by disabilities;

- Children, young people and families who have a family member who identifies as gay, lesbian, bisexual, transgender and/or intersex;
- Multicultural or newly arrived children, young people and families;
- Young and adult carers;
- Young parents;
- Sole parents;
- Children, young people and families involved with the out-of-home-care system; and,
- Children, young people and families who have been involved in the criminal justice system.

4.4 Workforce Development

Joint Respondents agreed that workforce development needs to be a key focus of the new alignment. The changes to these programs raise critical issues around the skills sets required by workers within both YSP and FSP services, who may be required to work with new target groups.

Workforce development also features strongly in the report *Professional Ethics and Youth Work: A Model for Strengthening Youth Work Practice in the ACT*, which was written for the Youth Coalition by Carrie Fowlie and Dean Cocking². The Report includes a number of recommendations relating to workforce development, including the development of a workforce development profile, developing sector policies and procedures, enhancing qualifications and designing supervisory mechanisms. The Youth Coalition has begun the process of establishing a committee to oversee the development of these initiatives, and has employed a Project Officer to complete a workforce profile for the ACT youth sector.

Recommendation 5

That OCYFS consider the specific needs and issues experienced by children, young people and families outlined in Section 4.3 of this submission; in the development of the Alignment.

Recommendation 6

That OCYFS support the development and implementation of workforce development initiatives in the new Alignment.

5. Response to Focus Area 1: A Robust Secondary Intervention System in the ACT

Joint Respondents acknowledged that children, young people and families should have access to the primary (universal) service system, and be able to access appropriate services through their engagement in the primary service system. The primary service system should have sufficient information regarding service availability, eligibility and access arrangements for those services.

5.1 Strengthening Primary Services

Joint Respondents agreed that a robust primary service system needs to be developed that can respond to children, young people and families' concerns. The robust primary service system needs to understand their early intervention role, have knowledge of services provided in the secondary and tertiary levels of intervention; and how each of these levels can work together, rather than exclusively.

The improved engagement of the primary service system, particularly the education system and health services, is key in the early identification of issues experienced by children, young people and families; and in working with other services. Through this, primary and secondary services need to develop stronger working relationships to support the early intervention role, and prevent escalation to the tertiary service system.

5.2 Cohesive Intervention and Responses

Joint Respondents highlighted the importance of strengthening the working relationships between the primary, secondary and tertiary levels of intervention; and their service delivery responses to children, young people and families.

Key factors identified in working towards a more cohesive service sector included:

- Knowledge among workers and organisations about services in the primary, secondary and tertiary levels of intervention;
- A clearer understanding among workers and organisations about the roles of primary, secondary and tertiary level services;
- Shared responsibility between the primary, secondary and tertiary levels of intervention to work with service users, particularly when needs and issues have been identified early to refer appropriately;
- Faster assessment and responses by tertiary services, for service users; and,
- Development of referral pathways for young people exiting statutory services and other services in the tertiary level. This includes active engagement through collaborative practice of both the tertiary and secondary service systems in their work with children, young people and families to promote successful transitions.

5.3 ACT Service System Coordination

Joint Respondents noted the disparity in coordination of the broader service system, at an ACT Government level. Children, young people and families receive support from a number of ACT Government agencies, and ACT Government funded services; that are not restricted only to the YSP and FSP.

Joint Respondents agreed that there is limited coordination of the service system between ACT Government departments and other relevant agencies, including (but not limited to): ACT Health, Department of Education and Training, Justice and Community Safety, ACT Policing, and sub-agencies within the Department of Disability, Housing and Community Services, such as (but not limited to) Housing ACT, Community Youth Justice, and the Office of Multicultural, Aboriginal and Torres Strait Islander Affairs.

Joint Respondents recommended that these agencies establish a regular meeting or committee by which to begin looking at aligning the service systems and developing a vision, purpose and commitment to a service system based on the needs of individuals (in this case, children, young people and families), rather than the primary functions delivered by each agency. Joint Respondents recommended that these agencies look at the development of agreed service pathways between systems (and including 'up and down' primary, secondary and tertiary levels), referral processes, and service standards.

5.4 Services for Aboriginal and Torres Strait Islander Children, Young People and Families

Joint Respondents identified a significant gap in the existing framework for Aboriginal and Torres Strait Islander children, young people and families. A range of strategies were suggested to reduce this gap, such as engaging Aboriginal and Torres Strait Islander specialist staff and agencies in the broader service system, improving resources to Aboriginal and Torres Strait Islander services to acknowledge their increased service delivery demand, and reviewing the training provided to those working with Aboriginal and Torres Strait Islander children, young people and families.

Additionally, Joint Respondents highlighted the importance of addressing the causes of over-representation of Aboriginal and Torres Strait Islander children, young people and families in the statutory system, rather than only the consequences of over-representation. Joint Respondents also noted that certain population groups, including Aboriginal and Torres Strait Islander children, young people and families, require long-term support from the service system, and the new alignment should not hinder this.

5.5 Services for Children Aged 8 – 12 Years

Joint Respondents identified a significant gap in the existing framework for children aged 8 – 12 years, which should be a key focus in early intervention and prevention measures, particularly as they transition into the high school system.

Joint Respondents raised significant concerns, that although we understand the Alignment aims to address this key gap, no additional resourcing is being provided by the ACT Government, which we believe to be vital.

Joint Respondents identified that specialist programs should be developed that assist this age-group as part of the service continuum, and should include children in families in the tertiary system as a specific target group. Effective models include programs which engage children before transition periods, and then build rapport to maintain a strong relationship with the child (and family) to support them through, and out of, the transition. It was noted that transitions should not be limited to that of primary to secondary school, but also look at other expected and unexpected changes (e.g. family separation). In the provision of services to this age group, Joint Respondents also noted the importance of providing training to existing workers to work with children aged 8 – 12.

Recommendation 7

That OCYFS identify strategies to improve the engagement of the primary service system with secondary and tertiary level services, in the development of the new Alignment.

Recommendation 8

That OCYFS identify strategies by which to strengthen working relationships between primary, secondary and tertiary level services; and their service delivery responses to children, young people and families, in the development of the new Alignment.

Recommendation 9

That OCYFS identify strategies to respond to service gaps for Aboriginal and Torres Strait Islander children, young people and families, in the development of the new Alignment.

Recommendation 10

That OCYFS aim to address the service gap for children aged 8 – 12 years in the development of the new Alignment, and seek additional funding to resource this.

6. Response to Focus Area 2: Collaboration and Service Integration

Joint Respondents welcomed the aspiration that we should be aiming for service users to access services provided in an integrated or seamless manner. Current research that has engaged young people around their experiences in the service system highlights their desire to 'walk their journey with one worker'.³ Many services already have good working relationships across the broader service sector and there are some good examples of collaborative work amongst providers that supports service integration:

- The Integrated Family Support Program;
- The Protecting Australia's Children Project;
- Turnaround; and,
- Youth Coalition Comorbidity Bus Tours (as an example of a sector development activity that leads to skilling workers to better understand what other agencies do and how to make good referrals).

6.1 Barriers to Collaboration and Service Integration

While collaborative and consortium models can work well in a small jurisdiction like the ACT, Joint Respondents identified that there are many challenges in the current service funding framework that provide barriers to collaboration and service integration, including (but not limited to):

- A lack of clarity about the purpose of the YSP and FSP;
- Competitive tendering processes;
- The range of services provided;
- Staff recruitment and retention issues;
- The need for agencies to triangulate funding sources in order to be viable; and,
- Limited collaboration and integration across government agencies and other services that we work with; that are not funded through the YSP or FSP.

6.2 Existing Systems

Joint Respondents agreed that there is a need to examine and possibly build upon the work being done in other sectors relating to collaboration and integration, such as the notion of 'no wrong door', which is discussed for the homelessness sector in *The Road Map*, the ACT Discussion Paper on homelessness.⁴ Features of a 'no wrong door' system include:

- Mainstream services assessing the housing needs of service users;
- Specialist homelessness services assessing other needs beyond housing like education and employment needs of service users;
- Strong service networks and agreements between all human service providers at a local level;
- Joint assessment, planning, coordination and case management; and,
- Sharing information about service users.

Joint Respondents agreed that it is important to recognise that collaboration and integrating services, whether in the form of networks, agreements, partnerships or delivery under consortium models, requires an investment of time and resource to develop, and then to sustain.

The process of collaboration and integration are organic processes that can be effective when developed by services with a vested interest in building and maintaining a working relationship. Services also need to be provided with training and support to develop effective collaborations. Joint Respondents discussed that the Construction Industry provides training and professional development opportunities to contractors in developing and maintaining partnerships.

6.3 Developing Effective Collaborations

Joint Respondents discussed the key components in developing effective collaborations and integrations in services, based on previous experiences and desired outcomes.

A well-developed consortium implies a pact for work based on shared understandings, backed by protocols as to outcomes and the required methodologies to achieve these. The value for money comes in benefits won through system deceleration outcomes (ie increase in secondary inclusion over tertiary exclusion) as opposed to outputs for money. An aspect of consortiums is the willingness for mutuality; that is, each organisation comes with a preparedness both to bend their own culture and to place goods on the table for a common and overarching outcome.

However, Joint Respondents a number of factors that are critical in this discussion, including:

- It is crucial that the notion of a 'seamless experience of support for service users' is not seen as an outcome that YSP and FSP providers can deliver in isolation. As such, we would call upon ACT Government to model this in the way that departments, such as the Department of Education, the Department of Disability, Housing and Community Services, ACT Health and Justice and Community Safety work together with each other and within themselves.
- A considerable amount of work needs to be completed prior to a tender process focusing on collaborative or consortium models. There needs to be clear, and shared, definitions of different collaborative models, such as 'consortium' or 'sub-contracting' model; and what is expected in a tendering process. Additionally, services must be supported, prior to the tendering process, to develop structures and processes by which to go about developing a collaborative model.
- Collaborative and consortium models are highly resource intensive, in both set-up and maintenance; and adequate resourcing needs to be allocated to reflect this. If the ACT Government is aiming to move administration and management to the community sector, then the resourcing that would be allocated to this within the ACT Government, also needs to be moved out to the community sector.
- Specific strategies need to be developed to support small agencies to participate in these processes, along with larger organisations.

Recommendation 11

That if the new Alignment is to have an increased focus on collaboration, integration, and consortium style models, adequate time and resourcing is provided to support this process, during planning, establishment and maintenance of these activities.

7. Response to Focus Area 3: Universal and Targeted Services; and Focus Area 5: Generalist and Specialist Services

Joint Respondents responded to have responded to both Focus Area 3 and Focus Area 5 in this section, due to the similarities in these areas.

7.1 Definitions

For the purposes of the alignment, Joint Respondents agreed there needs to be clarity around the definition of service provision. In the context of this submission, these definitions are:

- **Universal Services:** Services provided by and large by government to whole population groups, for example: Education or health services.
- **Targeted Services:** Services provided by both government and non-government services to address the needs of specific population groups, for example: A multicultural youth service or family support program.
- **Specialist Services:** Services provided by both government and non-government services to address specific issues, for example: Therapy ACT.
- **Generalist Services:** Services provided by government and non-government services that are available to the broader community – who may have a specific need or live in a specific area, for example: A local community centre.

Universal and targeted, and generalist and specialist services usually overlap and interface with each other; often dependent on collaboration to be successful. For example, a young carer program that focuses on carers supporting a family member experiencing a mental illness would require services that are able to bridge the areas of young people, carers, families and mental health.

7.2 Implications for the Alignment

Joint Respondents noted that it is essential that the alignment has the capacity to drive increased awareness and understanding in universal service provision, and to clarify their role and identity in the continuum of service delivery. The new alignment must also ensure that targeted and specialist services are not so tightly defined that they become small and inaccessible to the individuals they are contracted to support.

To address some of the needs in the community, highly specialist services will always be required. This needs to be supported by the alignment, which needs to ensure that those specialist services are of the highest quality. Joint Respondents highlighted the importance of certain population groups of children, young people and families who may require specialist support through the alignment. These include:

- Aboriginal and Torres Strait Islander children, young people and families;
- Children, young people and families who are homeless or at risk of homelessness;
- Children, young people and families affected by alcohol and other drug issues;
- Children, young people and families affected by mental health issues;

- Children, young people and families with or affected by disabilities;
- Children, young people and families who have a family member who identifies as gay, lesbian, bisexual, transgender and/or intersex;
- Multicultural or newly arrived children, young people and families;
- Young and adult carers;
- Young parents;
- Sole parents;
- Children, young people and families involved with the out-of-home-care system; and,
- Children, young people and families who have been involved in the criminal justice system.

Similarly, issues-based experiences that may require specialist support include (but are not limited to):

- Alcohol and other drug issues;
- Anger management issues;
- Comorbidity;
- Disengaging from education;
- Domestic Violence;
- Employment/training issues;
- Family breakdown;
- Health issues;
- Homelessness (at risk of);
- Homelessness;
- Issues accessing government services;
- Legal issues;
- Literacy and numeracy issues;
- Mental health issues;
- Sexual health issues; and
- Transport issues.

Joint Respondents identified that for some service users who experience highly complex needs; specialist and targeted services need to provide support over a prolonged period of time, which requires flexibility in the Alignment to respond to the emerging and changing needs of these service users.

Generalist services have the capacity to provide important early intervention for vulnerable children, young people and families. Generalist services provide an initial point of contact for service users who may not otherwise contact the service system. These services provide an initial point of contact that can ultimately lead to referral to specialist services. Additionally, specialist services can also provide a gateway, for service users who initially seek support on a specific issue, to access referrals to other services. Joint Respondents agreed that the alignment should put in place processes to ensure that referrals occur on a two-way basis, when appropriate; and referred to service users' preference to 'walk their journey with one worker' (previously discussed in Section 6).

Joint Respondents noted that the alignment needs to avoid a continuum of service delivery that is based on referral and tight eligibility criteria. The alignment needs to rest on notions of collaboration and integrating services – at both and between non-government and government services. There needs to be clarity on how the systems work together and what mechanisms are going to be embedded in the alignment to ensure that best outcomes for children, young people and families are at the core of operation.

Recommendation 12

That the new Alignment build in flexibility to respond to emerging, changing and long-term needs of children, young people and families.

8. Response to Focus Area 4: Service Reach

Joint Respondents identified the need to consider geographic constraints and barriers; and models of service delivery to children, young people and families, to ensure ease of access to services.

8.1 Geographic Constraints

Joint Respondents discussed that geographic constraints in the ACT are compounded by varying population growth across its regions. As discussed in Section 4.1; children, young people and families experience challenges in accessing adequate public transport, which further inhibits their ability to access services. Geographic inaccessibility of services aggravates critical circumstances increasing vulnerability and presentation by children, young people and families in the tertiary system.

8.2 Geographic Service Modelling

Joint Respondents agreed that the alignment must acknowledge and support the valuable relationship and rapport that a community, and especially its more vulnerable members, has with a service based within it geographically. It is important to find a balance between outreach, centralised services, and regionally based service models.

Outreach should be a key component of a framework that supports children, young people and families to access support without experiencing geographic constraints. However, Joint Respondents noted the importance of developing a clear understanding and implementation of the varying types of outreach models, such as differentiating between 'in-reach' and street-based outreach.

Joint Respondents also discussed the value of having regionally based services, such as 'school clusters', and identified the need for these to be complemented by specialist and outreach services to support children, young people and families. It was also noted that children, young people and families should still have the opportunity to access a range of service options.

In this section, Joint Respondents again noted the importance of children, young people and families being able to continue working with a key worker or services to access support; and acknowledged this as being central to the support of vulnerable and complex-needs service users, particularly highlighting:

- Key workers and organisations support vulnerable service users by providing ongoing secondary level advocacy and support along with addressing transport difficulties;
- Key workers and organisations are recognised as ongoing fundamental supports at a secondary level even as service users move in and out of the tertiary services; and,
- Service users moving between geographical regions need both outreaching key workers and organisations moving with them and recognisable neighbourhood centre responses to them where they move.

Recommendation 13

That the new Alignment seek to achieve a balance between outreach, centralised services, and regionally based service models for children, young people and families.

9. Response to Focus Area 5: Generalist and Specialist Services

Please note that services responded to Focus Area 5 as part of Focus Area 3, due to the similarities in these focus areas.

10. Response to Focus Area 6: Service Excellence

It should be noted that this section interrelates with information provided throughout this submission, and should therefore be read in the context of the broader submission.

Joint Respondents identified a number of key factors that can be implemented to begin to address the gaps in the broader service system. Moore states that universal services need to provide a broader range of services and that specialised services need to be supported to deploy the expertise of specialists more broadly.⁵

10.1 A Systems Approach

Joint Respondents identified that a systems approach needs to be applied, supported by an appropriate and supportive governance structure, which incorporates both government and non-government service providers. This approach would encourage agencies to see themselves and to function as part of a whole rather than as isolated units in competition with each other. This approach would also need to be allied with funding arrangements. The amalgamation of the YSP and FSP is a positive step in this direction, however there is much work to be done to foster and maintain a coherent collaborative cross-sectoral system.

One of the major difficulties in the broader service system is its complexity. Children, young people and families often find the service system confusing and frustrating to navigate. Once they have made the decision to seek help and/or support, they are then issued with numerous questions and forms, to justify their critical situation or need for support. The use of common referral forms and processes, and common intake and assessment processes could alleviate this situation.

The dissonance between how problems manifest and age limited, time limited, compartmentalised service provision further frustrates the gaps in the broader service system. Joint Respondents identified that more flexibility needs to be incorporated into services. Whilst there is still a need for specialist services, the accessibility of generalist services needs to be maintained at a high level, to negate the impacts of the challenges that children, young people and families experience in navigating the service system.

Additionally, Joint Respondents noted that service users are made to compartmentalise their experiences, situation or demographics, in order to receive support. As previously discussed in Section 5, if a 'no wrong door' approach is to be implemented, primary (universal) services need to have appropriate support, training and resources, where appropriate, to provide that broader range of support for service users.

The multiplicity of services in the ACT also contributes to the gaps in the broader service system, as it makes it challenging for services and service users to have a good understanding and knowledge of what is available. A number of strategies need to be employed to ensure that service users are aware of the supports available and that service providers are making appropriate referrals. Strategies may include:

- Resources such as *The Big Red Book: A Handbook and Directory for People Working with Young People in the ACT* may be a way to provide information for service providers in relation to pathways to other support for service users;
- Continuing community development initiatives;
- Common referral forms across services;
- Central information lines that may provide clarity or direction for service users; and,

- Reduction in the duplication of resources/services/programs.

10.2 Community Participation Programs

Joint Respondents noted the critical role that community participation and social integration programs play in building rapport between services and children, young people and families. These strengths-based programs can be the foundations from which quality service provision can start and are vital in engaging with children, young people and families that are hard to reach.

Joint Respondents expressed that outreach workers should have more of a presence in schools and early childhood centres. Children, young people and families need to access services within their own community and the less barriers that present (such as transport, and paperwork), the more likely hard to reach families are to engage with services. Meeting children, young people and families on their own terms and in their own environment has been proven to increase trust and respect between workers and service users, in addition to uncovering details and issues which may not be obvious in an initial office meeting. Joint Respondents again emphasised the importance of having a key worker to provide support to service users.

Programs and service delivery needs to be run in consultation with the community and support children, young people and families to access the space in which it will be held, the context in which it will be delivered and the outcomes that the program hopes to achieve.

10.3 Integrated Service Delivery

In the 2006 literature review⁶ conducted by the *Centre for Parenting and Outreach*, NSW Department of Community Services, it was noted that a key theme in the literature that discusses the challenges of responding to children and young people with high needs is the necessity for integration across service delivery systems.⁷

Currently there are agencies in the ACT who are committed to collaborative and integrated approaches, and who have some experience in these models through the Integrated Family Support Program, Protecting Australia's Children panel, IMPACT and other programs. Some of the learning's from these programs include:

- A cultural shift is required which takes commitment, time, and effort;
- Appropriate resources are required;
- Training and supervision are important to support new practice;
- If the above are available, change can happen rapidly;
- Commitment has to be more than rhetoric;
- The benefits of building on existing initiatives rather than 'reinventing the wheel' (for example: code of practice, Common Assessment Framework); and,
- There does not need to be only one model- case management, case co-ordination, community based care and protection workers, common assessment and referral processes are examples of different models that could all be implemented, amongst others.

A more integrated system would require appropriate connections to be made between the primary and secondary levels. Evidence highlights that a significant number of service users are currently directed straight to the tertiary level; bypassing the secondary level, due to a lack of pathways and knowledge within current service providers, and/or contractual restrictions. The alignment that is developed needs to have strong synergies across all sectors and levels, and include both government and non-government services and

programs (as previously discussed in Section 5.2). The alignment needs to ensure that pathways are created, that are safe and accessible for children, young people and families, who require various types of support.

Joint Respondents commend the ACT Government for endeavouring to develop a framework that will aim to ensure engagement and retention of 'hard to reach' service users, and note that a multi-faceted and flexible approach is required to seek to achieve this, that address barriers to accessing services (such as location, cost, language barriers).

10.4 Early Intervention

If service users have positive 'early intervention' experiences, this may significantly alter their willingness to continue to access the service system.

The introduction of *Paint and Play* programs throughout the ACT is an excellent example of early intervention and partnership arrangements. 'Paint and Play' is a universal outreach style, prevention and early intervention playgroup. The playgroup is delivered outdoors at a local park, with no cost and no requirement to provide personal details or commit to regular attendance. The aim is to encourage attendance by those who might otherwise not participate in playgroup or other early childhood activities. A range of activities that facilitate physical, social and cognitive development is provided for young children from babies to preschoolers. Outcomes identified by the NSW Department of Community Services include a lack of stigma attached to attending Paint and Play; and that the positive attendance framework allows very strong relationships to be built between the family and the workers. This provides the workers with the capacity to influence a family over an extended period in a positive way by enhancing parenting skills, and ensuring children are meeting their developmental milestones and are better prepared for preschool and school.⁸

[Early intervention and prevention] provides important building blocks that develop resilience to, or skills to avoid, challenges that may be faced, particularly at key turning points and transitions in people's lives. Government's investment in early intervention also potentially avoids or reduces the need to direct significant amounts of public money in the future toward the lengthy and expensive support programs that are required to address serious and engrained problems.⁹

10.5 Human Rights

Under a human rights-based approach, the plans, policies and processes of the service delivery framework would be anchored in a system of rights and corresponding obligations established and supported by both international and domestic law. This would assist in the sustainability of the alignment, empowering children, young people and families themselves—especially the most marginalised—to engage with the service system and hold accountable those who have a duty to act.

10.6 Evidence Base

Joint Respondents agreed that the alignment must consider the evidence base in the context of the ACT. While interstate and international evidence may be valuable, it must be contextualised to match the landscape of the service system in the ACT.

It is also important that any existing evidence or evaluation of programs is collated, evaluated and considered in establishing the new alignment. Funded services participate in reporting to the ACT Government to justify their outputs, however there is a lack of circulation of any of the evidence that these programs generate. This information may

provide crucial feedback to the sector on learnings and best practice. Where this responsibility sits is something that needs to be considered. If the funding body were to collate and disseminate this information appropriately, it may have a positive and significant impact on service provision and practice in the ACT. This is also discussed in Section 12.

Joint Respondents also discussed the possibility of the Chief Ministers Department collating information from the Department of Education; Disability, Housing and Community Services; and ACT Health to provide a clearer indication of the needs, service systems and outputs within the ACT. This may lend itself to not only increasing the evidence base, but also supporting current service provision and future proposed models.

Joint Respondents agreed that using 2006 Census Data as a basis for program development and key frameworks is no longer appropriate. The social, economic and demographic profile of the ACT has significantly shifted from 2006. Up to date statistics are vital. Social and demographic profiling of children, young people and families plays a key role in supporting the both the Alignment and service provision.

Recommendation 14

That the new Alignment seeks to improve service pathways for children, young people and families in navigating the service system.

Recommendation 15

That the new Alignment seeks to employ a multi-faceted and flexible approach to engage 'hard to reach' service users, that address barriers to accessing services.

Recommendation 16

That the new Alignment seeks to implement strategies by which to ensure service reporting contributes to developing an evidence-base for the ACT.

Recommendation 17

That OCYFS undertakes social and demographic profiling of children, young people and families in the ACT to inform the development of the new Alignment.

11. Response to Focus Area 7: Child and Young Person Centred and Family Focused Advocacy

Joint Respondents noted that this response does not directly discuss the structure or model of a peak body in child and young person centred and family focused advocacy; but discusses the role and functions that peak bodies provide. This is in recognition that discussions relating to peak structure and models are a broader conversation that should begin with an expressed desire by children, youth and family support services to explore this.

While Joint Respondents did discuss peak body structure and modelling issues, it was agreed that these discussions should not stem from a need to find efficiencies in government funding; and that the ACT Government should support the sector in longer-term discussions about what peak structure looks like.

11.1 Definition of a Peak Body

ACT Government has stated its commitment to supporting and acknowledging the role of peak bodies through the Social Compact, which states that the ACT Government will undertake to:

*'Understand and recognise the role that peak bodies and representative groups play in advocating issues on behalf of their constituencies.'*¹⁰

While community sector-based peak bodies work within varied models of practice, the role of peak bodies is broadly defined as representing the needs of a particular target group, which may include a service user group or service provider group.

Membership of the ACT Peaks Forum, facilitated by the ACT Council of Social Service (ACTCOSS), includes peak bodies that devote the majority of their resources towards *Policy Development and Advocacy*, *Sector Development*, and *Membership*.¹¹ Each of these activities are further outlined by the ACT Peaks Forum:

- *Policy Development and Advocacy*: The organisations have a substantial role in systemic analysis of ACT Government policy in their areas based on sound research and credible evidence, and seek to communicate those ideas to government, the sector and the broader community.
- *Sector Development*: The organisations seek to empower community organisations to improve and develop their services and ensure that they provide appropriate services to their users.
- *Membership*: The organisations are democratic and have strong links with members who they represent.

11.2 Peak Activities

Joint Respondents identified a number of important advocacy and other peak functions that need to be undertaken. These include:

- Policy: Analysis and development, responding to government policy, working with government to develop policy, submissions to inquiries, development of new policies and programs, media comment
- Representation: Provide a voice before and linkages to the government on behalf its constituents and the cohort they represent; engaging with other bodies
- Advocacy: For membership services, related services, and for the people being represented (e.g. children, young people and families), lobbying for specific issues, services, system gaps or population groups,
- Sector development: Provision of information to services, training, innovation and facilitating communication between services and sectors, identifying systemic issues (such as workforce development), support to individual services
- Engagement: with the people being represented (e.g. consultation with children, young people and families), community education
- Member support
- Research: Undertaking research projects, communicating evidence to services, linking research with sector activities

11.3 Funding for Peak Activities

The ACT Council of Social Service (ACTCOSS) submission to Focus Area 7 of the Discussion Paper reinforces that all functions of a peak body are connected:

*'All roles of peak bodies are intertwined, and separating them would be problematic. The significant advocacy role of peak bodies is informed by their policy work, which is informed by their links through to the sector and the strong evidence base they bring. This work also feeds into capacity building of the sector and broader community education.'*¹²

Joint Respondents agreed that peak activities need to be adequately funded to be implemented effectively, and that activities cannot be separated (e.g. sector development from policy).

11.4 Accountability

Joint Respondents agreed that peak bodies are accountable to a range of stakeholders, but ultimately to the constituents they represent. Accountability is an imperative element of a peak body. Determining who a peak body is accountable to requires a very careful deconstruction of the functions of the Peak Body and its assumed outputs. For example:

- Staff accountability to the organisational Board;
- Organisational reporting to various funding bodies on outputs;
- Organisational accountability to population groups they represent;
- Organisational accountability to services they represent;
- Organisational accountability to their membership; and,
- Legal accountabilities to the Registrar General.

Recommendation 18

That OCYFS ensure that peak activities are adequately funded under the new Alignment.

Recommendation 19

That OCYFS support key stakeholders to continue longer-term discussions around peak structure for children, youth and family support services.

12. Response to Focus Area 8: Program Outcomes and Performance Measures

Joint Respondents are particularly concerned that framework outcomes cannot be identified until the new alignment has clearly articulated aims and objectives.

Additionally, Joint Respondents are concerned that program outcomes and performance measures are being developed for this framework, that do not align with the work being progressed through the *Outcomes Based Service Funding Agreement Purchasing Framework Committee*, which is being developed more broadly through DHCS; or with national changes such as that being currently progressed for FAHCSIA's Family Support Program.

It is vital that ACT Government departments work in an integrated manner to identify population-based outcomes, and systems that need to be put in place.

12.1 Results-Based Accountability (RBA)

Joint Respondents acknowledged the value of the RBA model as an evaluation and planning tool. There are concerns that the current use of RBA in the output reporting has a significant focus on the quantitative and excludes the stories behind the work. We welcome the opportunity to work together to further expand the reporting to include qualitative aspects of the RBA model.

Joint Respondents suggest that the process of implementing RBA needs ongoing support. The capacity of services to meet the contracted outputs whilst engaging in a significant change process is a challenge.

12.2 Principles in Designing Outcomes and Performance Measures

Joint Respondents identified that flexible integrated service delivery requires flexible integrated contract management. Joint Respondents agreed that in designing program outcomes and performance measures; outcomes needed to be longitudinal, rather than only short-term, in recognition that change for children, young people and families occurs over a number of years. They should also be reflective of the primary, secondary and tertiary levels of intervention.

In relation to building the capacity of the sector to implement new outcomes and performance measures, Joint Respondents identified that adequate resources need to be allocated, not only to the up-skilling of workers; but to services' time and efforts in implementing it.

Joint Respondents also identified that current reporting can be restrictive. It was identified that reporting requirements need to be tailored to each funded service, to ensure ease of reporting for services; and the provision of appropriate information. Measurements also need to be viewed in context, rather than in isolation.

Additionally, Joint Respondents identified that it would be useful for OCYFS to develop feedback loops with funded services regarding reporting. Data received through reporting could be compiled into a complete document, to indicate the entire program's outcomes; and to be used in further program and policy development.

Recommendation 20

That OCYFS clearly articulate the aims and objectives of the new Framework, prior to identifying program outcomes.

Recommendation 21

That the new Framework seeks to align with other ACT and national processes relating to measuring program outcomes.

Recommendation 22

That the new Framework build in flexibility, resourcing and longer term outcomes into reporting requirements for services.

13. Conclusion

Joint Respondents would again like to thank OCYFS for providing the opportunity to contribute to the alignment of the YSP and the FSP.

We would particularly like to highlight the impact that this process is having on workers and services currently funded under the YSP and FSP. Joint Respondents noted that this process has impacted upon recruitment and retention processes for services; and emphasise the further impact that this will have in relation to service delivery for children, young people and families.

Joint Respondents also request the opportunity to provide formal feedback to the ACT Government on its process of aligning the YSP and FSP, and on consulting with funded services; both prior to the next consultation round and at the end of the process.

14. References

- ¹ Victorian Government (2008) Vulnerable Youth Framework Discussion Paper, Victoria
- ² Cocking, D; Fowlie, C (2009) Professional Ethics and Youth Work: A Model for Strengthening Youth Work Practice in the ACT, Report to the Youth Coalition of the ACT, Canberra
- ³ Noble-Carr, D; Moore, T; McArthur, M (2009) Who Cares? Experiences of Young People Living with a Family Members who has an Alcohol or Other Drug Issue, Institute of Child Protection Studies, Canberra
- ⁴ Department of Disability, Housing and Community Services (2009) The Road Map: A Discussion Paper on the Way Forward for ACT Homelessness Services and Related Services, ACT Government, Canberra
- ⁵ Institute of Child Protection Studies (2009), *ACT Youth Services Program: Future Directions*, Australian Catholic University National, p58.
- ⁶ Centre for Parenting and Research (2006), *Models of service delivery and interventions for children and young people with high needs: Literature review*, NSW Department of Community Services,
http://www.community.nsw.gov.au/docswr/assets/main/documents/research_service_delivery_models.pdf as at 19 February 2010.
- ⁷ Centre for Parenting and Research (2006), *Models of service delivery and interventions for children and young people with high needs: Literature review*, NSW Department of Community Services p33,
http://www.community.nsw.gov.au/docswr/assets/main/documents/research_service_delivery_models.pdf as at 19 February 2010.
- ⁸ NSW Government (May – June 2008) Inside Out, NSW
- ⁹ ACT Government (2005) ACT Government 2005-06 Budget Paper 3, Canberra.
- ¹⁰ Chief Ministers Department (2004) The Social Compact, ACT Government, Canberra
- ¹¹ ACTCOSS (2009) ACT Peaks Forum Terms of Reference, ACT Peaks Forum, Canberra
- ¹² ACT Council of Social Service (2010) Comment on DHCS Discussion Paper, Focus Question 7, Canberra