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11 March 2010

Dear Ms. Fisher;

On behalf of the Youth Coalition of the ACT (Youth Coalition), I would like to thank the Office for Children, Youth and Family Support (OCYFS), DHCS, for the opportunity to respond to the *Discussion Paper on Developing a Service Delivery Framework for OCYFS Funded Services Working with Vulnerable Children, Young People and their Families* (the Discussion Paper).

#### **1. About the Youth Coalition of the ACT**

The Youth Coalition is the peak youth affairs body in the ACT. As a representative organisation, the Youth Coalition has a broad membership base of around 90 members programs agencies and individuals. This membership includes community youth services, youth led organisations, other non-government organisations, youth workers and young people.

The Youth Coalition is responsible for representing and promoting the interests and wellbeing of people aged between 12 and 25 years and those who work with them. Our vision is 'to actively promote the human rights, well being and aspirations of young people in the ACT community, with particular respect to their economic, political, cultural, spiritual, educational, and social development'.

The objects of the Youth Coalition are to:

- (a) Promote and encourage the participation of young people in the development of policy, programs and service development.
- (b) To raise awareness of access and equity principles and practice for young people, including direct service delivery, employment, education and participation in decision making within the community.
- (c) Develop and maintain coordinated networks and linkages between government, non-government organisations, private sector and young people in order to establish a positive strategic vision for the ACT youth sector.
- (d) Promote unity and collaboration within the non-government youth sector of the ACT.
- (e) Facilitate and coordinate information dissemination between service providers, young people, government and the wider community.

- (f) To engage in advocacy and facilitate policy debate.
- (g) Undertake and promote sector development, encourage and demonstrate best practice approaches which assist services and the ACT Government in improving client outcomes.
- (h) When appropriate auspice and support the establishment of new services which fill identified gaps in service provision to young people.
- (i) Undertake research.
- (j) Convene and actively participate in forums and/or bodies ensuring that the issues relevant to youth organisations, employees and young people in the ACT are raised.
- (k) Encourage, support, promote and facilitate effective professional development.
- (l) Such other activities that may be incidental to achieving the objectives of the Coalition.

As an incorporated organisation, the Youth Coalition has organisational, individual and associate members. The Youth Coalition is governed by a Board of Management, whose membership must include both young people and organisational members, and who is responsible for the overall strategy and direction of the organisation.

The Youth Coalition is represented on many ACT Government advisory structures and provides advice to the ACT Government on youth affairs as well as providing information to youth services about policy and program matters. The Youth Coalition also participates in the national arena, through engagement with other state and territory, and national, youth peak bodies.

A key role of the Youth Coalition is the development and analysis of ACT social policy and program decisions for young people and youth services. The Youth Coalition facilitates the development of strong linkages and promotes collaboration between the community, government and private sectors to achieve better outcomes for young people in the ACT.

## **2. Response to the Discussion Paper**

In response to calls from the agencies and programs funded under the Youth Support Program (YSP) and Family Support Program (FSP) to work collaboratively in responding to the Discussion Paper, the Youth Coalition has contributed our resources to the coordination and support of the development of a joint submission from these sectors, to be submitted on 19 March. For this reason, this letter responds only to *Focus Area 7: Child and Young Person Centred and Family Focused Advocacy* (Focus Area 7) in the Discussion Paper.

The Youth Coalition has identified a number of areas in Focus Area 7 that require further consideration by OCYFS, including:

- The role of a peak body;
- Accountability of peak bodies;
- Peak services to the child, youth and family support sectors;

- The value of youth work and young people; and,
- Youth Coalition funding.

### 3. The Role 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.’<sup>1</sup>*

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 client 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*.<sup>2</sup> 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.

While all of the organisations identified in Focus Area 7 of the Discussion Paper provide important and valuable functions, they are not all considered to be ‘peak bodies’, as they may not deliver each of the specific services outlined above.

The Youth Coalition provides a number of activities related to policy development and advocacy, sector development, and membership. For an overview of activities implemented in the 2008/2009 financial year; please see the Youth Coalition 2008/09 Annual Report, provided as an attachment to this submission.

In the 2010 Annual Members and Other Stakeholders Survey, key stakeholders provided feedback on Youth Coalition activities. The findings from this survey indicated that all respondents participated in one or more Youth Coalition activities, with the weekly Youth Coalition eBulletin and Monthly Youth Coalition Forums having the highest level of sector participation.

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<sup>1</sup> Chief Ministers Department (2004) The Social Compact, ACT Government, Canberra

<sup>2</sup> ACTCOSS (2009) ACT Peaks Forum Terms of Reference, ACT Peaks Forum, Canberra

Some comments provided by stakeholders who completed the survey included:

*'The Youth Coalition is a fabulous representative body for young people and services, and does a great job in our community!'*

*'Keep doing what you're doing.'*

*'You're all awesome and very strong advocates for young people and the sector.'*

*'Keep up the good work.'*

*'Doing a great job!'*

#### **4. Accountability of Peak Bodies**

Services involved in the development of the joint sectors submission by YSP and FSP services agreed that peak bodies are accountable to a range of stakeholders, but ultimately to the constituents they represent.

The Youth Coalition has over 90 members, and works with a number of key stakeholders, which broadly includes young people aged 12 – 25 in the ACT, and those who work with them. Service stakeholders include youth and community services in the ACT, ACT Government agencies, Australian Government agencies, and other bodies. These are outlined in further detail below.

1. *Youth services in the ACT:*

Youth services work in a range of disciplines, models and sub-sectors, and receive funding from a variety of sources. Youth services often don't sit solely in the 'youth sector', but also work across a number of sectors in the ACT, such as family support, alcohol and other drug, mental health, housing and homelessness, justice, education, employment, disability, and health. Services includes government and community youth services as well as those who work with specific groups of young people, such as Aboriginal and Torres Strait Islander, multicultural and newly arrived, or young carers, to name a few.

2. *Community services in the ACT:*

It is vital that the youth sector develops and maintains strong linkages with broader community services in the ACT, due to the complex nature of issues young people may experience. The Youth Coalition also has strong relationships with other peak bodies in the ACT, such as the ACT Council of Social Service (ACTCOSS), as well as other service sectors such as the housing/homelessness sector and alcohol and other drug sector.

3. *ACT Government Agencies:*

The Youth Coalition works with a number of ACT Government agencies. Although we are accountable to OCYFS in relation to the outputs currently funded through the YSP, we also work with the broader Department of Disability, Housing and Community Services, as well as other agencies such as ACT Health, Justice and Community Services, Department of Education and Training, and Territory and Municipal Services. The Youth Coalition is called upon to sit on many ACT government advisory groups to provide a youth affairs perspective a sample of which has included:

Crime Prevention and Community Safety Forum (JACS)  
Joint Community Government Reference Group (DHCS)

Children and Young People Sharing Responsibility Framework  
Steering Committee (DHCS)  
Mental Health Promotion, Prevention, Early Intervention and  
Evaluation Group (ACT Health)  
Youth Commitment Steering Group (DET)  
Government and Community Advisory Group for Young People  
(DHCS)  
Alcohol, Tobacco and Other Drug Strategy Implementation and  
Evaluation Group (ACT Health)  
Community Advisory Group (TAMS)

4. *Australian Government Agencies:*

The Youth Coalition receives some funding from Australian Government agencies, and is therefore accountable in the provision of outputs funded. Additionally, we have participated in Australian Government initiatives and consultations that could affect young people in the ACT. Examples of this include the Youth Coalition's contribution to the consultation around the National Youth Strategy, as well as contribution to DEEWR commissioned research around the sector development needs of the youth sector nationally.

5. *Other Bodies:*

The Youth Coalition regularly engages with other bodies, including training providers, interstate youth services, national peak bodies (such as the Australian Youth Affairs Council, AYAC), and other state and territory youth peak bodies.

The Youth Coalition does not limit its work to services funded by OCYFS. In order for our activities as a peak body to be effective, we need to work with other services and sectors in an integrated, holistic way. The youth sector in the ACT is broader than those services funded by OCYFS.

## **5. Peak Services to the Child, Youth and Family Support Sectors**

Services involved in developing the joint submission by YSP and FSP services engaged in robust discussions about how the provision of advocacy and other peak activities to children, young people, their families and those who work to support them should look. This letter outlines the Youth Coalition's position on this issue, with specific support expressed by a number of member organisations who do not receive YSP funding.

Firstly, the Youth Coalition is concerned that this process is being initiated because of the need to find efficiencies in ACT Government funding, rather than an identified need by the sector. While we understand there is a desire to build on efficiencies and current functions, the Youth Coalition is concerned that these processes are not necessarily being dictated by the need to improve outcomes for children, young people and families; nor those who work with them.

The Youth Coalition acknowledges the important role that peak bodies play in furthering the aspirations and experiences of the sections of the community they represent for the benefit of the whole community. In doing this peak bodies will often secure funding from a range of sources in order to progress short term projects, test best practice, model new ideas, and support establishment of new services that meet service gaps. However, this capacity is dependent on stable core funding. For example the Youth Coalition's participation in the Crime Prevention and Community Safety Forum has led to the securing of a small amount of funding from ACT Health

and JACS for the Youth Coalition to be able to conduct a youth peer led research project investigating young people's experience of and response to alcohol use and related violence.

As highlighted at Minister Burch's recent community sector round table, the funding structures of many community services rely on a number of sources, and the removal of one source may have a disproportionate effect on the capacity of the service related to its other funding.

The Youth Coalition recognises the need for the family support sector to have increased peak body capacity, but strongly believe that this should not be at the expense of the youth sector. We understand that the pool of funding for peak activities is unlikely to expand through the alignment of the YSP and FSP funding streams, and that any reduction or movement in current funding will have a significant impact upon provision of peak services to all stakeholders. We have provided further information about the impact of funding changes later in this submission.

The Youth Coalition has been engaged in activities with the family support sector, through coordinating activities such as the Family and Adolescent Network, the Ethics and Youth Work Project, providing training and networking opportunities, and engaging in research around Family-Aware Youth Work Practice.<sup>3</sup>

Initial conversations around the best models of providing advocacy and other peak activities to children, young people, their families and the workers and services providing support to them have identified a number of key differences in philosophical and practice approaches of the youth support sector and family support sector.

Stakeholder discussions have also included identifying alignment points and similarities in desired functions. Whilst stakeholders have openly discussed a range of models, including the feasibility of a single peak body for the children, youth and family support sector; the Youth Coalition notes that any significant change or transition would require significant time and effort; much more-so than the 6-month process of aligning the funding streams. Additionally, these transitions should not be progressed due to an economic climate, but rather, should follow a considered process in which all stakeholders, including those not funded under the YSP and FSP streams, agree on a model that will improve outcomes for children, young people and families, and those who work with them.

## **6. The Value of Youth Work and Young People**

The Youth Coalition maintains a strong position, that through the alignment of two funding streams, the important role, identity and value of youth work is not overlooked. Additionally, that the specific support needs of young people aged 12 – 25 years are not 'lost' or 'absorbed' through this process.

The ACT Young People's Plan 2009-2014 recognises that;

*Between the ages of 12 and 25, young people experience a number of significant developmental stages and transitions from early to late adolescence, to early adulthood. This life stage brings considerable physical*

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<sup>3</sup> Strong Bonds Project (2009) Family-Aware Youth Work Practice, Jesuit Social Services, Victoria

*and emotional change and growth as young people develop their identity and increase their independence.*<sup>4</sup>

The Youth Coalition recently launched a report titled *Youth Work and Professional Ethics: A Model for Strengthening Youth Work Practice in the ACT*. The report was developed following the Professional Ethics and Youth Work Project that was initiated by the Youth Coalition in 2008, and highlights the importance of youth work:

*Young people are a distinct, but not homogenous group. They frequently experience disadvantage, discrimination and unequal access to communal resources. This is systematically and systemically embedded at all levels, including individual, social, legal, cultural and political...*

*Young people's needs and interests are specific enough to justify specific services delivered by professionals who are both knowledgeable and skilled in working with young people and in youth affairs. Youth work is the only profession dedicated to, and with distinctive skills and knowledge in working with, young people.*<sup>5</sup>

The Youth Coalition is committed to promoting the principles and practice of youth participation, particularly of young people who access youth services. Youth participation has become more prominent in the ACT youth sector, with services working to develop strategies and mechanisms by which to support youth participation within their services. It is vital that this work continues to progress.

## **7. Youth Coalition Funding**

The Youth Coalition Board is very concerned that the alignment of funding streams may result in reduced core funding for the Youth Coalition; which would have a significant impact on the advocacy and other peak activities we provide to young people and the youth and community sectors.

Member organisations have voiced their concerns that reduced funding, which would result in reduced advocacy and other peak activities, may have further-reaching negative impacts on their service delivery also. 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.'*<sup>6</sup>

This issue is particularly pertinent in the youth sector, as issues young people may experience are highly complex and inter-related; and cannot be viewed as silos. For example, reduced funding may result in the Youth Coalition being forced to make decisions about prioritising such as engagement with the youth housing/homelessness sector versus the education sector. An inability to engage

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<sup>4</sup> DHCS (2009) The ACT Young People's Plan 2009-2014, ACT Government, Canberra

<sup>5</sup> Cocking, D; Fowlie, C (2009) Youth Work and Professional Ethics, Report to the Youth Coalition of the ACT, Canberra

<sup>6</sup> ACT Council of Social Service (2010) Comment on DHCS Discussion Paper, Focus Question 7, Canberra

with either sector would have further negative consequences for other areas of the Youth Coalition's work.

Additionally, the Youth Coalition is concerned that the alignment may seek to change the model of funding for peak organisations, such as the Youth Coalition, without adequate or comprehensive consultation processes.

At a recent service-visit with OCYFS, our funding manager raised the possibility of moving to a funding model in which a selected group of child, youth and family service providers become responsible for tendering out funding for peak activities, rather than the ACT Government. The Youth Coalition Board has serious concerns regarding this model, for the following reasons:

- Stakeholders and services supported by peak bodies are broader than those services funded by OCYFS;
- It should not be the responsibility of service providers to implement the administrative functions of the ACT Government, and are unlikely to receive additional funding to implement them; and,
- Service providers have limited capacity to deliver their own services.

We look forward to having further discussions with OCYFS regarding these issues.

The Youth Coalition again thanks OCYFS for providing the opportunity to input into this process.

Please do not hesitate to contact Emma Robertson, Director of the Youth Coalition, on (02) 6247 3540 or at [director@youthcoalition.net](mailto:director@youthcoalition.net) if you wish to discuss this letter further.

Sincerely,

Alex Lewis  
President  
On behalf of the Board of the Youth Coalition of the ACT