



Submission to the draft *Service Delivery
Framework 2010 - 2013*

December 2010

www.youthcoalition.net

The Youth Coalition of the ACT acknowledges 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 Youth Coalition of the ACT celebrates Indigenous cultures and the invaluable contribution they make to our community.

Submission to the draft *Service Delivery Framework 2010 - 2013*
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December 2010

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Thank you to the Youth Coalition staff team for their support.

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Youth Coalition Submission to the draft Service Delivery Framework 2010 - 2013
December 2010

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1. Introduction

Section 1 of this submission provides contextual information about the Youth Coalition of the ACT, the process for developing and format of this submission.

1.1 Youth Coalition of the ACT

The Youth Coalition is the peak youth affairs body in the ACT. Comprised of 100 members, programs, and individuals the Youth Coalition is responsible for representing and promoting the interests and wellbeing of young people aged 12 to 25 years and those who work with them.

The Youth Coalition is represented on many ACT Government advisory structures and provides advice to the ACT Government on youth issues, along with providing information to youth services about policy and program matters.

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.

1.2 Process for Developing and Format of this Submission

The Youth Coalition has engaged in lengthy consultation with the youth sector during 2010, around the development of the Service Delivery Framework. Key activities have included:

- Coordinating the development of a joint sector submission from YSP and FSP funded services to the *Discussion Paper on Developing a Service Delivery Framework for OCYFS funded services working with vulnerable children, young people and their families*;
- Holding a forum in March 2010 on the role of peak bodies in the Youth and Family Support Program;
- Developing a submission to *Focus Area 7: Child and Young Person Centred and Family Focused Advocacy* in the *Discussion Paper on Developing a Service Delivery Framework for OCYFS funded services working with vulnerable children, young people and their families*;
- Participating in the Performance Indicators and Outcomes Group for the Youth and Family Support Program;
- Holding a forum for the youth sector at which Mr Frank Duggan, Executive Director of the Office for Children, Youth and Family Support presented on the changes to the Youth and Family Support Framework;
- Holding a consultative forum with Youth Coalition members in December 2010 on the draft Service Delivery Framework;
- Developing and disseminating a survey for Youth Coalition members and stakeholders on the future of peak activities in the Youth and Family Support Program;
- Holding a series of network meetings to discuss the Service Delivery Framework, including the Youth Centres Network, Youth Housing and Homelessness Forum, Youth Sexuality and Gender Diversity Network, and Multicultural Youth Affairs Network;
- Participating in on-going discussions with Families ACT around the future of peak activities for the Youth and Family Support Program;

- Meeting with MLAs and key ACT Government representatives during 2010 to provide on-going feedback on the process of developing the Youth and Family Support Program;
- Participating in YSP Directors' Group meetings;
- One-on-one consultations with member services and organisations; and,
- Current and topical research on youth affairs.

This submission has been divided into 8 sections, which include the following:

1. Introduction (this section)
2. Summary of Recommendations
3. General Feedback
4. Process for Developing the Draft Service Delivery Framework
5. Content of the Draft Service Delivery Framework
6. Conclusion
7. References
8. Attachments

This submission represents an opportunity for the Youth Coalition and stakeholders to identify and advise ACT Government of emerging issues, areas in need of additional resources and collaboratively develop social policy in the ACT.

While we recognise that written submissions were not specifically requested in response to the draft Service Delivery Framework, the Youth Coalition has developed this submission for the following reasons:

- The process outlined at the start of the change to aligning the Youth and Family Support funding streams identified that once the draft Framework was released there would be an additional opportunity to provide feedback in writing;
- The Youth Coalition was unable to attend the only sector briefing/consultation meeting following the release of the draft Service Delivery Framework, due to it being scheduled at the same time as an event we were organising with Minister Joy Burch; and,
- While we had meetings with the Manager of Strategy and Purchasing, OCYFS; the Chief Executive, DHCS; and Minister Joy Burch during the consultation period, it is important that feedback is on record and available to all working to produce a framework that best serves people who will need to access youth and family support services in the ACT.

2. Summary of Recommendations

Section 2 provides a summary of the recommendations this submission. It is vital that these recommendations be referred to in the context of the broader submission.

Recommendation 1

That OCYFS implement the recommendations from the Youth Coalition's submission to the draft *Engaging Canberrans: A Guide to Community Engagement* in all future consultative activities.

Recommendation 2

That OCYFS finalise the Youth and Family Outcomes and Indicators document prior to the procurement process, and clearly articulates its relationship to the Service Delivery Framework.

Recommendation 3

Further to Recommendation 2, that OCYFS provide feedback to the sector on the level of engagement with agencies and programs in feedback to the Youth and Family Outcomes and Indicators document and performance measures, including what feedback was received, and if / how it was incorporated.

Recommendation 4

That, in recognition of the discrete issues experienced by vulnerable young people aged 18 – 25 years, the Service Delivery Framework reinstate a focus on vulnerable young people aged 12 – 25 years, rather than only young people aged 12 – 17.

Recommendation 5

That an evaluation framework be developed, with input from government and non-government agencies, and potential service users, and that a committee is created to review and evaluate the Centralised Intake and Information Coordination Service.

Recommendation 6

That all promotional material for vulnerable young people and their families is reviewed by a professional panel prior to publication, to ensure promotional materials are evidence-based and best-practice.

Recommendation 7

That the Service Delivery Framework clearly articulate how funding will be distributed between the four regional networks, ensuring that funding is allocated equitably to support vulnerable children, young people and families in these regions, and is based upon all of the following data sources:

- Population forecasting;
- Socio-economic information;
- Criminal justice data;
- Care and Protection data;
- Housing data;
- Education and health needs; and,
- Data from current youth and family services on service users and identified needs.

Recommendation 8

That the Service Delivery Framework increase the funding allocated for Youth Engagement Services to at least 18% of the overall budget, by reducing the Case Management Budget to 20%.

Recommendation 9

That the Service Delivery Framework define young carers as up to 25 years of age; who are caring for a family member.

Recommendation 10

That the Service Delivery Framework clearly articulate how all the funding for the YFSP will be allocated, including the 19.4% not currently included, with a detailed breakdown.

Recommendation 11

That the Service Delivery Framework clearly articulates the funding allocation for peak activities in the YFSP, and recognises peak activity as a key component of the new Framework.

Recommendation 12

That a comprehensive workforce development strategy be developed and implemented for the YFSP, in partnership between the government and non-government sector, and the proposed 1-2% funding allocation form the basis of this strategy.

Recommendation 13

That OCYFS establish an implementation and evaluation group for the Service Delivery Framework, comprising of representation from government and non-government services (both YFSP funded and from the broader youth and family sectors), and peak bodies, which should be directly accountable to the Children and Young People Sharing Responsibility Steering Committee.

3. General Feedback

The Youth Coalition and the youth sector have welcomed some positive aspects of the draft Service Delivery Framework, including the opportunity to provide innovative services to young people and their families.

While the alignment of the Youth Services Program and Family Support Program has been challenging for youth services and the youth sector, the Youth Coalition congratulates the youth sector for embracing the changes.

Youth services and the Youth Coalition have embraced aspects of the draft Service Delivery Framework. In particular, the Youth Coalition is pleased that services that support multicultural young people, and Aboriginal and Torres Strait Islander young people, will be offered funding through a single-select process. The Multicultural Youth Affairs Network (MYAN), coordinated by the Youth Coalition, has also reported they are pleased that the draft Service Delivery Framework has identified multicultural young people as a target group. As such, they have requested that the MYAN Issues Paper be attached to this submission for further consideration by OCYFS.

The Youth Coalition welcomes the inclusion of assertive outreach as a component of the draft Service Delivery Framework, recognising this as a key strategy to engage with 'hard-to-reach' young people and their families. We do note, however, that the funding allocated towards this is unrealistic.

The youth sector has also welcomed the focus on collaborations and partnerships, which recognises and formalises the strengths and relationships that youth services have already established and work hard to maintain within the sector. The Youth Coalition highlights the importance of providing support to developing and maintaining these partnerships and collaborations.

4. Process for Developing the Service Delivery Framework

Section 4 of this submission aims to provide feedback on the process for developing the draft *Service Delivery Framework 2010 - 2013* (draft Service Delivery Framework), including consultation and timeframes on the draft Service Delivery Framework.

4.1 Consultation on the draft Service Delivery Framework

The Youth Coalition notes several concerns regarding the consultation process for the draft Service Delivery Framework.

We acknowledge that at this stage there is time pressure to complete the contracting process 3 months prior to the end of existing contracts. However, the timeframe for consultation has changed a number of times and we note that in the *Future Directions of the Youth and Family Support Programs Newsletter Issue 11 September 2010* it was announced that the draft Service Delivery Framework would be released the week of 27 September 2010.

The draft Service Delivery Framework was eventually released to the community sector on 3 November 2010, with responses due 15 December 2010, allowing for the recommended six-week period of consultation. A single consultation session was advertised for the 11 November 2010, although there was some confusion about whether the purpose of this session was an information dissemination or consultation.

The Youth Coalition, along with our members and stakeholders, understood that OCYFS believed the draft Service Delivery Framework had gained the broad approval of the youth sector. Meetings with OCYFS indicated that only final comments were being sought, and agencies wanting to respond to particular or specific issues were to arrange face-to-face meetings, in place of written submissions.

The Youth Coalition believes that the 'broad approval' indicated by OCYFS was informed by a select number of service providers and did include the broader YSP and FSP services. This view has been informed by feedback received from services that have recently engaged with our consultative process.

The message to services within the YSP and FSP that the draft Service Delivery Framework was not open to meaningful feedback was strengthened when it was announced that the procurement phase would begin on 4 January 2011. This would only allow 10 working days after the closure of feedback, for OCYFS to receive and incorporate feedback; and for subsequent changes to be communicated back to the YSP and FSP prior to tendering commencing.

In a recent meeting, the Chief Executive Officer of DHCS advised that the department is committed to receiving feedback, and will respond to all feedback received.

The Youth Coalition is concerned that the flaws in the consultation process contradict the principles set out in 'The Social Compact: A partnership between the Community Sector and the ACT Government', and may have created barriers to useful and important feedback being provided to OCYFS. The Youth Coalition recently developed a submission to the ACT Government Draft Community Engagement Manual (please see Attachment).

Recommendation 1

That OCYFS implement the recommendations from the Youth Coalition's submission to the draft *Engaging Canberrans: A Guide to Community Engagement* in all future consultative activities.

4.2 Timeframes for the Service Delivery Framework

The Youth Coalition recognises the importance of the draft Service Delivery Framework, and acknowledges the goals to strengthen the service delivery system supporting vulnerable young people and families in the ACT.

We also recognise that DHCS received responses to the *Discussion Paper on Developing a Service Delivery Framework for OCYFS funded services working with vulnerable children, young people and their families* that indicated that current YSP and FSP service providers were keen for this process to begin in a timely fashion, partly to address the short extension to funding contracts.

The draft Service Delivery Framework places a strong emphasis on collaboration and partnerships, once again in line with key messages from DHCS stakeholder consultations, and the Youth Coalition supports this.

However, we are concerned that YFSP agencies are being unduly pressured to create these partnerships in a hasty fashion, which may result in poor outcomes for vulnerable young people and families, and the agencies that work to support them. Whilst agencies have been aware of the process of merging the funding streams for 12 months, and have had time to start partnership conversations, the draft Service Delivery Framework has only been available for 6 weeks. The release of the draft Service Delivery Framework was the first opportunity for agencies to realistically map where the services they have expertise in providing might fit, and what partnerships might look like in a practical sense.

In addition to the complex nature of the broader changes to the YFSP, and the time frames falling over the Christmas, New Year and school holidays periods, the raft of other reforms that are occurring, or are soon to occur, in the housing/homelessness, out-of-home-care and youth justice sectors are key things that will need to be considered by agencies in responding to the Service Delivery Framework.

Further to this, the Youth Coalition is aware that the Youth and Family Outcomes and Indicators draft document was released on 4 November 2010, and that this document, when finalised, will sit as a base document within the new Service Delivery Framework.

The final date for feedback on this important document is 24 December 2010. We understand that a date in January will be set, to offer YSFP agencies an opportunity to offer suggestions for performance measures; however we are concerned that this will occur in the procurement period meaning that agencies will not have all of the information to inform their tender development.

For the YFSP to respond to fundamental shifts in service delivery focus, develop new and meaningful partnerships, negotiate major reforms in allied sectors, and engage in a tendering process that begins before the Outcomes and Indicators document, and anticipated reporting conditions may be finalised, is concerning.

Recommendation 2

That OCYFS finalise the Youth and Family Outcomes and Indicators document prior to the procurement process, and clearly articulates its relationship to the Service Delivery Framework.

Recommendation 3

Further to Recommendation 2, that OCYFS provide feedback to the sector on the level of engagement with agencies and programs in feedback to the Youth and Family Outcomes and Indicators document and performance measures, including what feedback was received, and if / how it was incorporated.

5. Content of the Service Delivery Framework

Section 5 of this submission seeks to provide feedback on key aspects of the draft Service Delivery Framework. Comments provided are strongly founded in the feedback provided by a number of services currently funded by OCYFS, and the broader youth sector.

5.1 Loss of Focus on Young People aged 12 – 25 Years

The Youth Coalition is deeply concerned that the draft Service Delivery Framework may result in a significant loss of existing services for young people aged 12 – 25 years and their families in the ACT.

Following concerns raised by the youth sector with OCYFS after the release of the *Discussion Paper on Developing a Service Delivery Framework for OCYFS funded services working with vulnerable children, young people and their families*; the ACT Government committed that the ratio of funding currently delivered to children, young people and their families through the YSP and FSP would remain the same under the new YFSP. That is, \$5.2 million delivered through the YSP to support young people and their families; and \$3.2 million delivered through the FSP to support children and their families.

The draft Service Delivery Framework does not commit to ensuring the existing level of services to young people and their families will continue to be delivered; and in fact indicates that direct services to young people will be significantly decreased. The Youth Coalition is concerned that this reduction in services will result in an increase in young people and their families being pushed into crisis, and then into the tertiary service system, because they no longer have the same level of access to support through primary and secondary services. The reduction may also result in an increase in demand upon other services and sectors (such as housing and homelessness, mental health, and alcohol and other drugs), which do not have additional resourcing or capacity to support them.

The Youth Coalition is also disappointed that the draft Service Delivery Framework primarily focuses on children and young people aged 0 – 17 years of age; with supports for young people aged 18 – 25 years only focusing on their transition to independence and engagement with the adult service system. The Youth Coalition recognises that a key role for youth services is to support young people aged 18 – 25 years to transition to independence and adult services; and notes that this support work also requires specific resourcing and recognition. This vital support role has been recognised in other sectors, such as mental health (for example, through the development of CAMHS to support young people aged 12 – 25 years), and more recently through the out-of-home-care sector (with a recent focus on supporting young people to transition out of care, beyond the age of 18).

Additionally, the Youth Coalition notes the importance of supporting young people aged 18 – 25 years in a family context, particularly in light of the increasing role of the family to support young people who are staying at home longer and/or relying on their family for financial support. National policy has clearly articulated the responsibility of families to support young people beyond the age of 18, and the Service Delivery Framework should also reflect this.

The Youth Coalition notes that the focus on children and young people aged 0 – 17 years does not align with the ACT Young People’s Plan 2009 – 2014, which clearly defines young people as being aged 12 – 25 years. Additionally, it does not recognise the many transition points young people aged 18 – 25 years experience, particularly in relation to education, employment and housing; that were identified by young people who participated in the development of the ACT Young People’s Plan.

Recommendation 4

That, in recognition of the discrete issues experienced by vulnerable young people aged 18 – 25 years, the Service Delivery Framework reinstate a focus on vulnerable young people aged 12 – 25 years, rather than only young people aged 12 – 17.

5.2 Central Intake and Information Coordination Service

The Youth Coalition believes there are many positive aspects to the proposed Central Intake and Information Coordination Service (CIICS) model. Many benefits will be gained from the centralised data collection point, and will assist agencies in responding to unmet needs and facilitate better program focusing.

Education providers will also benefit from having a single desk to approach when seeking assistance, support and referral for vulnerable young people and families, and we believe this will enhance the level of engagement between government and non-government agencies.

However, the Youth Coalition is concerned that the proposed CIICS has several logistical issues that have not been addressed in the draft Service Delivery Framework. The function and description in the draft Service Delivery Framework outline a single place of intake and referral, partly staffed by the proposed 4 regional network coordinators. The proposed model has potentially negative implications for both young people and the youth and family support sector.

Youth and family support agencies may find it difficult to station a regional network coordinator part-time at the single desk CIICS, and still maintain an effective presence in their respective region. Potential conflicts of interest may arise, or been seen to arise, in the case of preferential referrals. The position of the CIICS, which is also tasked with overseeing cross-sector collaboration and integration, must be seen as neutral and fair to effectively engage with youth and family support agencies and programs, including those not funded through the YFSP. The Youth Coalition believes this last task will be vital to ensuring the success of the transition to a CIICS, and will require a dedicated and well-resourced position/s.

The Youth Coalition believes this model may negatively impact on young people who do not have mandated structures of support, and do not have the same level of access to referral pathways as a young person with Care and Protection Services or Youth Justice linkages.

The barriers we anticipate include: access to the CIICS and/or regional hubs, beyond that already experienced by vulnerable young people and families; a potential delay and/or doubling up of service visits or interviews for episodes of support, in the case of a young person seeking assistance from a agency that does not have ties to either the CIICS or the nominated network coordinators agency; and a potential for a perceived lack of confidentiality, in that sensitive information may be shared between agencies, regional network coordinators and the CIICS.

It is anticipated that many of these barriers could be addressed in due time, with more detail of the physical and practical implications to be revealed in the procurement process. However, an evaluation framework is required to ensure the best outcomes for vulnerable young people and families in the ACT, and those that work to support them.

The promotion of the CIICS will also be very important. Young people and their families have unique engagement processes, and young people in particular may need targeted and focused communication strategies to facilitate engagement and awareness. The Youth Coalition believes that this issue requires a strong youth participation and consultation process.

Recommendation 5

That an evaluation framework be developed, with input from government and non-government agencies, and potential service users, and that a committee is created to review and evaluate the Centralised Intake and Information Coordination Service.

Recommendation 6

That all promotional material for vulnerable young people and their families is reviewed by a professional panel prior to publication, to ensure promotional materials are evidence-based and best-practice.

5.3 Regional Networks

While the Youth Coalition and the youth sector have identified some positive aspects of delivering services through locally based services, a number of concerns have been identified, relating to loss of services for young people, competitive tendering and distribution of funding.

The Youth Coalition notes that with the exception of Belconnen, each of the other three regions have existing youth services provided by more than one service provider. It is unclear within the draft Service Delivery Framework how funding will be distributed between the four regional networks (i.e. by general population, general target group, vulnerable target group, future population growth, or equal division of resources).

Services have raised concerns that a simple equal division of resources between the four networks would result in inequitable service delivery to children, young people and families across the ACT. The Youth Coalition strongly supports that this allocation of funding is based upon a comprehensive analysis of need, including all of the following sources: population forecasting, socio-economic status, criminal justice data, Care and Protection Services data, housing data, identified education and health needs, and data from current youth and family services on their service users (such as the numbers of young people currently accessing services within each region).

The Youth Coalition is also concerned that the establishment of the regional networks and redistribution of funding may undermine the work undertaken by the youth sector to establish services in response to identified needs; such as through the 8 regionally-based drop-in youth centres in the ACT.

Recommendation 7

That the Service Delivery Framework clearly articulate how funding will be distributed between the four regional networks, ensuring that funding is allocated equitably to support vulnerable children, young people and families in these regions, and is based upon all of the following data sources:

- Population forecasting;
- Socio-economic information;
- Criminal justice data;
- Care and Protection data;
- Housing data;
- Education and health needs; and,
- Data from current youth and family services on service users and identified needs.

5.4 Case Management and Youth Engagement Services

The youth sector has raised significant concerns with the Youth Coalition regarding the allocation of 28% of funding in the draft Service Delivery Framework to case management.

Youth services have been reporting to ACT Government for a number of years that they have experienced difficulties in meeting their funded case management hours - not because there are not enough young people to case manage – but because young people often identify as wanting more informal supports. In response to this, youth services, and particularly youth centres, have identified innovative and more appropriate ways of engaging and supporting young people. The further development of the Service Delivery Framework must use an evidence-based approach to including case management for young people and their families.

While Youth Engagement Services have been included in the draft Service Delivery Framework, the Youth Coalition notes that allocating only 9% of the overall budget, across 4 networks, is inadequate to achieving its outputs. Youth Engagement Services are a fundamental component of supporting young people aged 12 – 25 years in the ACT, particularly with its new emphasis on assertive outreach. Youth workers providing practical support to young people and their families will be implementing a significant proportion of case-work.

In light of this, the Youth Coalition urges the ACT Government to increase the funding allocation for Youth Engagement Services to at least 18% of the overall budget, by reducing the Case Management budget.

Recommendation 8

That the Service Delivery Framework increase the funding allocated for Youth Engagement Services to at least 18% of the overall budget, by reducing the Case Management Budget to 20%.

5.5 Young Carers and their Families

While the Youth Coalition is pleased that funding has been allocated to support young carers and their families, we urge the ACT Government to recognise young carers as aged up to 25 years, recognising the vital supports that young carers aged 18 – 25 years provide to their families.

We also recommend that the definition of a young carer be expanded to include young carers who are supporting a family member; rather than only parents, to

acknowledge the fact that many young carers care for siblings, grandparents, and other relatives.

The Youth Coalition supports the written feedback provided on the draft Service Delivery Framework by Mr Tim Moore, President of Carers Australia:

- Recognising the raft of issues experienced by young carers that are not causally related to their parent's capacity: including their own mental health issues, their educational difficulties, their social and financial needs, their employment prospects;
- Including young carers caring for family members other than their parents and those who have 'capable' parents who are experiencing difficulties due to the system's inability to meet their needs;
- Determining impact for young carers, and thus access to service, on the basis of level of care provided and the level of support gathered; and,
- Adopting the broad definition of carers as: 'a person who provides unpaid primary care to someone else who is dependent on the person for ongoing care and assistance'.

Recommendation 9

That the Service Delivery Framework define young carers as up to 25 years of age; who are caring for a family member.

5.6 Allocation of Total Funding

The Youth Coalition notes that 19.4% of funding has not been included in the draft Service Delivery Framework. While it has been assumed that this funding will go towards services receiving funding by single-select tender, including peak activities, it is important that the breakdown of this additional funding is clearly articulated within the Service Delivery Framework.

Recommendation 10

That the Service Delivery Framework clearly articulate how all the funding for the YFSP will be allocated, including the 19.4% not currently included, with a detailed breakdown.

5.7 Peak Activities

The Youth Coalition is concerned that the draft Service Delivery Framework provides minimal information on peak activities for the YFSP; including the funding allocation towards this component of the YFSP.

In addition, the Youth Coalition notes that the graph in Section 1.6 of the draft Service Delivery Framework does not link peak activities to the remainder of the Framework. Peak activities should be a core component of the new Framework, and will provide key support to the sector.

Recommendation 11

That the Service Delivery Framework clearly articulates the funding allocation for peak activities in the YFSP, and recognises peak activity as a key component of the new Framework.

5.8 Professional Development

The draft Service Delivery Framework asks for responses to a proposal for funding to be identified for training for community sector employees to obtain recognised qualifications. The Youth Coalition welcomes this proposal, however, believes that the professional development needs of the YFSP are complex, and require a long-term, sustainable and comprehensive workforce development plan for the ACT.

In November 2010, the Youth Coalition prepared a report titled *Motivation, Money, Making a Difference: A Profile of the ACT Youth Sector Workforce*. A major finding was that over 50% of respondents aged 18 – 25 years, and over 40% of respondents aged 26 – 35 years hold a Bachelor or Postgraduate degree, with many more also holding tertiary qualifications in allied community sector fields. This was a welcome finding of the report, and supports the argument that the youth sector is a highly skilled and motivated workforce.

The draft Service Delivery Framework indicates a 1 - 2% investment in professional development for youth and family support services, which equates to approximately \$180,000. It is unclear at this stage what this funding will go towards, or the efficacy of such a relatively small amount.

Considering the size and scope of the current YSP and FSP sectors, and the increase in role and responsibilities the draft Service Delivery Framework and YFSP merger is anticipated to bring, the Youth Coalition is concerned that unless the proposed funding is balanced against a needs assessment and targeted approach to professional development, the goal of improved capacity could be diluted and ineffective. We believe that current work being undertaken by the Workforce Development sub-group of the Children and Young People Sharing Responsibility Committee would be well placed to inform the YFSP professional development plans.

Recommendation 12

That a comprehensive workforce development strategy be developed and implemented for the YFSP, in partnership between the government and non-government sector, and the proposed 1-2% funding allocation form the basis of this strategy.

5.9 Evaluation and Review

The Youth Coalition is concerned that the draft Service Delivery Framework does not appear to include any scope for evaluating the new structure of YFSP services.

The shift for services to move to Outcomes Based Reporting is an un-resourced change. The majority of Youth Coalition members have indicated an interest in Outcomes Based Reporting, and believe that the change will result in a better service for young people, as a well as a more reflective reporting tool for funding bodies.

This, combined with existing Raising the Standard processes, and commitments outlined in the ACT Young People's Plan 2009-2014, will allow for some evaluation of the overall changes. We also recognise the various governance structures set out in the draft Service Delivery Framework.

However, the broader draft Service Delivery Framework represents significant change for the entire YSFP, as well as many other agencies, such as specialist homelessness services, which are not funded by OCYFS. Such fundamental shifts in focus for YFSP services will need a rigorous and consistent cycle of review and

evaluation, particularly in the first 3 years, to ensure that the best possible service is provided to vulnerable young people and families in the ACT, and that the overarching framework does not have any unforeseen negative impacts on services.

The Youth Coalition recommends the establishment of an implementation and evaluation group for the Service Delivery Framework, comprising of representation from government and non-government services (both YFSP funded and from the broader youth and family sectors), and peak bodies, which should be directly accountable to the Children and Young People Sharing Responsibility Steering Committee.

Recommendation 13

That OCYFS establish an implementation and evaluation group for the Service Delivery Framework, comprising of representation from government and non-government services (both YFSP funded and from the broader youth and family sectors), and peak bodies, which should be directly accountable to the Children and Young People Sharing Responsibility Steering Committee.

6. Conclusion

The Youth Coalition would like to thank the ACT Government for providing the youth sector with the opportunity to provide feedback on the draft Service Delivery Framework.

While the Youth Coalition acknowledges that substantive changes will not be made to the Service Delivery Framework, the recommendations outlined in this submission provide simple and key opportunities to ensure that the Youth and Family Support Program delivers adequate and quality services to support young people and their families throughout the ACT.

7. References

Chief Minister's Department (2004) The Social Compact, ACT Government, Canberra.

Office for Children, Youth and Family Support (2009) ACT Young People's Plan 2009 – 2014, Department of Disability, Housing and Community Services, ACT Government, Canberra.

Office for Children, Youth and Family Support (2009) Discussion Paper on Developing a Service Delivery Framework for OCYFS Funded Services working with Vulnerable Children, Young People and their Families, Department of Disability, Housing and Community Services, ACT Government, Canberra.

Office for Children, Youth and Family Support (2010) Draft Service Delivery Framework 2010 – 2013, Department of Disability, Housing and Community Services, ACT Government, Canberra.

Youth Coalition of the ACT (2010) Motivation, Money, Making a Difference: A Profile of the ACT Youth Sector Workforce, Canberra.

8. Attachments

The following attachments were provided electronically with this submission:

- The Multicultural Youth Affairs Network Issues Paper, December 2010; and,
- The Youth Coalition's submission to the draft *Engaging Canberrans: A Guide to Community Engagement*, which was released by the Chief Minister's Department.