



youth  
coalition  
of the ACT

# Response to the Draft Strategic Investment Plan for the ACT Child, Youth and Family Services Program

The Youth Coalition of the ACT acknowledges the Traditional Owners and continuing Custodians of the lands on which we work, and pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of First Nations children and young people from their families as well as past racist policies and actions continues today. We acknowledge that First Nations peoples hold distinctive rights as the original people of modern-day Australia including the right to a distinct status and culture, self-determination and land. We celebrate First Nations cultures and the invaluable contribution they make to our community.

The Youth Coalition acknowledges the First Nations youth workers, young people and families who have come to Canberra from all across Australia and are making an ongoing contribution to the culture and community of our city. We acknowledge previous generations who have contributed to the history and culture of Canberra.

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

The Youth Coalition of the ACT is the peak youth affairs body in the Australian Capital Territory. The Youth Coalition's vision is for an ACT community that values and provides opportunity, participation, justice and equity for all young people. The Youth Coalition undertakes policy development, sector development, research and evaluation, advocacy and representation activities to improve outcomes for young people and their families.

A key role of the Youth Coalition is the development and analysis of ACT social policy and program decisions that affect 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.

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For more information, visit [www.youthcoalition.net](http://www.youthcoalition.net).

## Introduction

The Youth Coalition is pleased to submit this response to inform the continued development of the Strategic Investment Plan for the Child, Youth and Family Service Program (CYFSP), and thank the Community Services Directorate for the opportunity to provide feedback and suggestions. Our response discusses the (a) strengths of the Plan, (b) questions from services, and (c) concerns and areas requiring further development. We also put forward suggestions that may strengthen the Investment Plan and/or support the broader CYFSP commissioning process.

As part of developing this response, we heard from child, youth and family service providers both within and external to the current CYFSP. This was not a representative sample of service providers, and the items raised in this document will not represent all service providers' views. Engaging with service providers presented an opportunity to canvass their perceptions about what works well in the Investment Plan and what they are concerned about. In particular, it provided an opportunity to identify key questions or areas that require further clarification or information.

We understand that many service providers will be providing their own feedback and submissions to this process. As such, while we use this as an avenue to pass on identified questions and concern areas; this response presents the views of the Youth Coalition, as the peak body for young Canberrans and those who support them. The Youth Coalition is committed to continuing to work collaboratively and in partnership with community and government, to work towards strengthening service systems, to improve outcomes for children, young people and their families.

Where relevant, **suggestions and recommendations** that aim to strengthen the Investment Plan, support the broader CYFSP commissioning process, or work towards addressing other issues identified by services, are provided in boxes throughout this document.

## Strengths of the Investment Plan

We have heard from service providers that 'on the whole', the draft Investment Plan is a 'good plan'. It is clear that the Investment Plan builds on and has sought to listen closely to the findings of consultations conducted throughout the earlier commissioning process. It is evident that the Investment Plan seeks to learn from and avoid repeating the negative experiences of other sub-sectors engaged in commissioning, such as to minimise the impact of transitions upon frontline services. Furthermore, it endeavours to avoid repeating some of the challenges that services remember experiencing during the original establishment of the CYFSP. Particular strengths of the Investment Plan include:

- 1. Dedicated funding streams for Aboriginal and Torres Strait Islander, and culturally and linguistically diverse, children, young people and families; and the increased percentage of funding allocated towards the integrated service model for Aboriginal and Torres Strait Islander children, young people and families.**

We welcome the recognition within the Investment Plan regarding the need for a more integrated and culturally sensitive approach in funding, that enables services to span the support intensity spectrum. We note that evaluation processes will need to carefully monitor whether the total funding allocated to these two streams is adequate, particularly as these service models will function across the support spectrum.

- 2. Allocated funding for monitoring and evaluation activities within the new CYFSP.**

Non-government organisations across a range of community sub-sectors have advocated for funding for evaluation activities. It is our understanding that the CYFSP is the first sub-sector to enact it. The allocation of these funds will support improved transparency and accountability; and importantly, also provide an opportunity to understand the strengths and vulnerabilities of the CYFSP as a system. It will be necessary that evaluation processes take a cross-funding stream and systems-perspective, in order to understand how effectively the CYFSP is working as an integrated system of support.

- 3. Commitment to supporting transition processes without reducing frontline services.**

Service providers that have participated in other sub-sector commissioning processes have reported that 'service transitions' following the procurement phase of commissioning have been particularly problematic; in part due to the lack of additional funding provided to support this process.

We acknowledge the intention within the Investment Plan to minimise the impact on 'client-focused funding streams' during the transition, by using funds made available through the future cessation of Network Coordination and the Workforce Development and Training Fund. We note that some service providers have raised concerns with regard to this decision, which we discuss later in this response. Broadly, however, we acknowledge that there are no additional funds available to support transitions and support the intention to minimise the impact upon front-line services.

#### **4. Shifting towards evidence-based practice and service models.**

We welcome the emphasis in the Investment Plan on strengthening evidence-based practice and service models, both as part of the procurement process and longer-term delivery of the CYFSP. Later in this response, we put forward some suggestions to strengthen this component of the Investment Plan.

#### **5. Inclusion of programs, and associated funding, working in the preventative early support stream of the CYFSP.**

We support the inclusion of programs operating in the preventative early support stream, within the CYFSP. This is an opportunity to improve referral pathways between preventative services and targeted services. As these pathways are strengthened, there are opportunities to also improve linkages with government early support services for families, such as child and family centres.

#### **6. Community-led collaboration between services, where appropriate.**

While it is implicit rather than explicit within the Investment Plan, it is our understanding that it is anticipated that any funding applications that include service provider partnerships will be led by those service providers and occur organically. This is a positive departure from the original establishment of the CYFSP which strongly encouraged collaboration and led to a range of challenges for service providers. In moving away from this, there is recognition that collaboration can be difficult to achieve and requires genuine commitment and interest from service providers.

#### **7. Enabling 'step-up' (community-based) referrals to Intensive and Therapeutic Services.**

It is our understanding that services funded through the 'Intensive and Therapeutic Services' stream will be able to receive community-based referrals in addition to referrals from CYPS. This is in contrast to the current CYFSP in which referrals to intensive case management services can only be received from CYPS. The capacity for these services to accept community-based referrals provide a necessary diversionary pathway away from statutory services, and an opportunity for earlier intervention.

## **Questions from Services**

In our consultations with service providers, several questions and areas emerged that require further information or clarification. These areas may be addressed within the final version of the Investment Plan, and/or through other communication processes and mechanisms.

#### **1. Lack of clarity regarding 'Integrated Service Models'**

Several service providers identified that they felt unclear about what 'integrated service models' (p. 21) specifically refers to, as this section discusses both service models and integration across sectors. Service providers were unsure whether this section of the Investment Plan relates primarily to a broader system-level intention to improve integration across the human services system. If so,

service providers were unsure whether they should be considering how to incorporate this into planning their service models.

Upon further conversation with CSD, we understand that this component of the Investment Plan relates to the preference for service providers to design *holistic service models that provide multi-faceted support to children, young people and families* (noting this may include different practices, approaches and programs for working with different family members). This distinction from integration of the broader human services system may need to be further clarified in the Investment Plan.

Furthermore, these discussions prompted broader questions and continuing uncertainty regarding how the CYFSP will be positioned in relation to other key reforms, including *Next Steps* and the raising of the *Minimum Age of Criminal Responsibility*. Service providers suggested that it could be beneficial for CSD to host a child, youth and family service system presentation and 'Q&A' session. This would allow service providers to better understand the 'bigger picture' of these reforms and how different components are intended to complement each other.

**Suggestion:** That the Community Services Directorate host a child, youth and family sector presentation and 'Q&A' opportunity. It was suggested this include an opportunity to ask questions about the CYFSP Investment Plan, and also broader current and forthcoming reforms. It would be beneficial for this to be planned in collaboration with the relevant peak bodies, to support sector engagement.

## 2. How the procurement process will operate, and the need for flexibility

Service providers highlighted that the 'blue sky' approach to service model design across the funding streams is a potentially welcome shift away from the over-prescriptive model under the previous/current CYFSP. However, this also contributed to uncertainty regarding how the procurement team would build a cohesive and consistent CYFSP service system across the ACT, from service providers' respective funding applications.

Service providers queried whether there would be flexibility and opportunities built into the procurement process, to allow the procurement team to discuss and negotiate adjustments to service providers' funding applications. It was felt that this would be beneficial in order to provide service providers with an opportunity to amend their offers to respond to gaps identified by the procurement team. It was also noted that these processes need to be communicated to service providers prior to the procurement process taking place.

**Suggestion:** Consideration and further clarification regarding how the procurement process will operate; with planned processes (including for negotiation and adjustments) clearly communicated prior to the procurement process commencing.

## 3. Lack of clarity regarding the Next Steps Panel

Through consultations, it emerged that service providers had varying understanding of what the 'Next Steps Panel' is (particularly due to the emergence of other panels, such as the MACR Therapeutic Support Panel for individuals), how it is intended to function, and when/how they can apply to be part of the Panel for the procurement of Intensive and Therapeutic Services.

It is our understanding that the Next Steps Panel will operate as an 'organisational merit list' of sorts, allowing services to pre-qualify for procurement, and enabling more efficient procurement processes. It may be beneficial to provide further information in the Investment Plan regarding the broad purpose and function of the Next Steps Panel, and when available, clarify the anticipated timelines for the Panel 'refresh' and application requirements.

**Suggestion:** Include further information in the Investment Plan regarding the broad purpose and function of the Next Steps Panel, and when available, clarify the anticipated timelines for the Panel 'refresh' and application requirements.

#### 4. Reporting requirements in the first year of the CYFSP

Service providers queried what the reporting requirements are likely to be in the first year of the CYFSP, noting that the evaluation team will not yet be in place. Following further discussions with CSD, it is our understanding that reporting requirements will be minimal and flexible during the first year, to provide services with time to manage the transition and establish their processes.

**Suggestion:** Include further information in the Investment Plan to clarify that initial reporting requirements will be minimal and flexible during the first year.

## Concerns and areas requiring further development

In our consultations with service providers, several concerns and areas requiring further development emerged.

### 1. Impact on the CYFSP Workforce

The most significant concern that service providers raised, related to the retention of the CYFSP workforce, and the potential loss of practitioners from the community sector. It was noted that the risk of 'staff leaving early' will need to be considered in transition planning and expectations of services. Services raised the importance of communicating change as early and clearly as possible, to support both individuals and organisations to manage these processes, including with clients.

We acknowledge that there is a strong 'human element' to the commissioning process, that is an inevitable but distressing part of these processes for individuals and services. While this will be a difficult process for the CYFSP, we also note the intention within the Investment Plan to provide longer contracts within the new CYFSP, which will support longer-term retention of staff.

### 2. Potential gaps in priority population cohorts

It was noted by service providers that young people aged 14–24 with multiple and complex needs who do not fit into another priority population cohort, were absent from the Investment Plan. There is a concern that they will fall through the gaps in support. It was suggested that young people be explicitly included in the priority population cohort 'families with multiple and complex needs', to ensure that these young people are not left behind.

Service providers were also unclear about whether or how the CYFSP would respond to the support needs of young people transitioning from out-of-home care. This related to a broader ambiguity regarding how the CYFSP aligned with the broader Next Steps reforms; reiterating the need for a child, youth and family service system presentation to explain how these systems components and reforms will complement each other.

### **3. Absence of sector coordination or training opportunities in the first year of the CYFSP**

As highlighted earlier, the Investment Plan proposes ceasing Network Coordination and the WDT fund in 2025-26, to enable funding to be made available to support the transition process without adversely impacting on client-focused funding streams.

There are varying views within the sector regarding the discontinuation of Network Coordination. We understand that the intention of the Investment Plan is to move away from a specifically region-based model for the CYFSP, allowing greater flexibility and opportunity for consistency in service support across the ACT. It is hoped that this will still allow for place-based responses that meet local needs, whilst preventing region 'boundaries' that may contribute to inconsistent supports across regions. We note that valuable projects are being undertaken by the Network Coordinators, and anticipate that those focused more on direct service provision will be included in organisational funding applications to the preventative and targeted funding streams.

We have heard concerns about the absence of sector coordination support and training / professional development during 2025-26, at a time when the CYFSP is experiencing a high level of change. It is unknown at this stage, what nature of sector coordination would be required, particularly given the shift away from region-based models. However, there is time and opportunity to learn from other sub-sectors that have already experienced procurement; regarding what types of sector coordination and support may have been helpful during the transition and establishment phases. This may include, for example, communication mechanisms or opportunities for service providers to engage with and understand service models across the CYFSP.

**Suggestion:** That scoping and planning be undertaken in 2024-25 to understand the potential sector coordination needs of the CYFSP in 2025-26. Scoping and planning activities would need to be undertaken in partnership with the CYFSP and key stakeholders, to determine the potential scope and nature of support needed.

Noting that the WDT often underspends its funding allocation, it is feasible that WDT funding could be expended in the 2024-25 year, to allow for the delivery of these coordination activities in 2025-26, if they are found to be necessary.

### **4. Usability of the Evidence-Rating Scale**

As discussed earlier, we support the emphasis on evidence-based practices and service models in the Investment Plan. Strengths of the evidence-rating scale include the invitation to service providers to consider the evidence-base for existing and proposed service models, a clear theory of change articulated through program logics, and the early focus on developing alignments between evidence, program delivery and evaluation.

It has become evident that there are varying understandings among service providers regarding 'evidence', and how they will apply the evidence-rating scale. This has contributed to a sense of anxiety about procurement. There is a risk that this lack of clarity of what is expected from services, will lead to poorly or misinformed funding applications, and ultimately, missed opportunities to develop a robust CYFSP.

We have observed in the commissioning of other sub-sectors, including through research processes, varying capacity within organisations to (a) engage in tender processes, and (b) access resources regarding evidence and develop program logics. We have also heard feedback from CYFSP services that there is concern smaller organisations, or those with limited 'centralised' capability, may be disadvantaged in the application process.

We understand that further work is already planned to refine the evidence-rating scale. With this in mind, we note that the current limitations and risks of the Scale include:

- a. Organisations may find it difficult to determine where their proposed model fits, and procurement teams may also find it difficult to score programs against the Scale, due to:
  - The conflation of items within the Scale that are associated with, but not directly related to, the hierarchy of evidence for service models. For example, evaluation methodologies may sit variously across the tiers of the evidence hierarchy;
  - The existence of program procedures and monitoring and evaluation (M&E) frameworks may not (necessarily) be a demonstration of good or best practice (see below);
  - Service providers may design multi-faceted service models incorporating a range of different practices and approaches, which may align with different parts of the Scale.
  
- b. It may be beneficial to delay the development of program procedures and M&E frameworks until after procurement, for the following reasons:
  - It may be more useful for these detailed program documents to be developed once the new CYFSP landscape is known. This will allow service providers to consider opportunities to align processes and/or respond to community needs, with an informed understanding of how the CYFSP landscape will function more broadly.
  - To enable service providers to focus their procurement efforts on developing evidence-based models, clear theories of change and detailed program logics; rather than too much on the 'daily nuts and bolts' of service delivery (especially if these are amended through negotiation processes).
  - To enable the development of detailed M&E Frameworks to coincide with the development of outcome measures.
  - The inclusion of detailed program procedures and M&E frameworks would potentially require additional time capacity from the procurement team and adds a risk of delays to the procurement process due to the time required to consider the rigour of those documents.

The evidence-rating scale could be strengthened through a clearer focus on evidence for the model and its delivery; and clarifying accompanying requirements:

- (1) *Clarifying the requirements for demonstrating the use of evidence in service model design*

The Youth Coalition hopes to undertake a small project to develop a shared language and definitions regarding evidence and to support services to understand where and how to access evidence to inform their service models. In the meantime, the Investment Plan may benefit from more clearly articulating the expectations on services regarding how they will demonstrate the evidence to support their proposed service models.

For example, the Investment Plan may need to clarify that services are not being asked to conduct RCTs or quasi-experimental studies in the lead-up to procurement; but rather, that they might look towards the national and international literature for other studies that support their proposed practice or model. Service providers may also consider matching different types of 'evidence'; for example, drawing upon literature relating to their specific practice/model, and 'matching' this with client testimonials or case studies.

### *(2) Detailed Program Logics and Theories of Change*

It would be reasonable to require service providers to develop a detailed Program Logic as part of the procurement process, which includes a clear theory of change. At a minimum, Program Logics should include the following key components:

- The program's purpose and target group
- The 'problem' or area of need that the program is seeking to respond to
- The 'theory of change' underpinning the program
- The key assumptions, theories and/or principles of the program
- Program inputs (what is required to deliver the program)
- Program activities and outputs
- The intended outcomes of the program

If Program Procedures and M&E Frameworks are not required as part of the procurement process, Program Logics should provide enough detail that the procurement team can easily understand how the program is expected to operate.

**Suggestion:** The evidence-rating scale could be strengthened through a clearer focus on evidence for the model and its delivery; and clarifying accompanying requirements. This could include (1) clarifying the requirements for demonstrating the use of evidence in service model design, and (2) requiring detailed program logics articulating a clear theory of change.

We further propose that Program Procedures are developed within the first 12 months of program delivery; and corresponding M&E Frameworks within the first 18 months.

## Contact details

Thank you for the opportunity to contribute to this process. For more information about the items included in this submission, please contact:

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