Submission to the Department of Social Services

A new approach to programs for families and children consultation

Child and Family Focus SA

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'Reconciliation' by Kobe and Hamish Collins
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Acknowledgement

We acknowledge the traditional lands of the Kaurna people and acknowledge the Kaurna people as the custodians of the Adelaide region and the Greater Adelaide Plains. We pay our respects to Kaurna Elders past, present and emerging.

We acknowledge the traditional custodians of land beyond Adelaide and the Adelaide Plains, and pay our respects to all Aboriginal Elders past, present and emerging.

We acknowledge and pay our respects to the cultural authority of our Aboriginal and Torres Strait Islander colleagues and are grateful for the cultural expertise that they represent.

The role of Child and Family Focus SA

CAFFSA is the South Australian peak body for child safety and wellbeing and child protection, representing the needs of South Australian children, young people, families, and the non-government, not-for-profit organizations who support them.

Contributors

This report was created in partnership with members of CAFFSA's Policy and Advocacy Committee. Members of these groups comprise over 40 agencies across South Australia who provide services to children. young people and families involved in or at risk of involvement with the child protection system.

Purpose

Child and Family Focus SA (CAFFSA) provides this submission in response to the public consultation by the Department of Social Services on the discussion paper *A New Approach to Programs for Families and Children*.

Background

CAFFSA's member organisations provide crucial services and responses to vulnerable children, young people, families and communities across South Australia. Most members provide this support through a mix of state, national and philanthropic funding programs, often with augmentation through their own fund-raising efforts. Many of our members deliver one or more programs subject to this review through the department's child and family programs.

CAFFSA's membership encompasses the broad range of ACCOs and NGOs that work in the child and family sector in South Australia. Members share CAFFSA's commitment to the vision of:

A future where every child thrives, deeply connected to their family, community and culture, and empowered to reach their full potential. They are supported by a resilient and sustainable sector with the resources and innovation to drive meaningful change.

CAFFSA and our membership are keen to work with the department in the attainment of the aims of the reform and provide the following feedback in the spirit of genuine engagement and partnership. Together with the sector, the transition to new arrangements under the reform provides vital opportunities for realignment and improvements. We value the invitation to participate.

Structural Reform and Relational Contracting

There is broad support amongst membership for the proposed shift to relational contracting and longer-term contracts, noting the many clear benefits that would follow from this approach for both parties. CAFFSA members raised several key issues that will require resolution for these proposals to realise the desired positive differences.

Whilst recognising the potential benefits of relational contracting, the challenges that will be posed by frequent turnover of contract managers, lack of restorative practice skills on both sides of the relationship, and the need for training and orientation to ensure genuine power-sharing and shared decision-making was also raised.

Members felt a key component of relational contracting rests on contract managers staying long enough to build trust and use the banked relational knowledge to further the partnership and the effectiveness of the funded program, noting that this was not always their experience.

It is important to recognise that relational capability varies according to levels of skill, capacity and willingness to enact reciprocity, shared decision-making, and awareness of power dynamics. It was felt that a high challenge/high support operating environment is required to make this happen and that this will take trust, time and resourcing. Relational contracting specifically requires time and funding beyond service delivery dollars. It also requires recognition that the truth-telling and trauma responsiveness of restorative practice that we ask our families to engage in is not always reflected in current relationships between funding bodies and recipients and that all will need to embark on a relational journey together.

CAFFSA members also question whether relational contracting should be extended to the tendering process itself. It is understood that funding for all programs subject to this reform will be determined through a competitive tendering processes. CAFFSA asserts that, in some areas, particularly those in rural and remote area, a market does not exist, as only one provider has capacity to deliver services in that area, and a more sensible approach would be to apply the concept of relational contracting at this stage of the process in these cases.

Contract Length, Flexibility and Workforce Stability

Membership indicated strong support for longer-term contracts. Members noted that short-term contracts undermine:

- ✓ workforce retention
- ✓ planning certainty
- ✓ financial viability concerns for agencies
- ✓ ability to evolve practice
- ✓ trust-building across all settings, and particularly in rural and remote areas

The contradiction between short-term funding and the relational contracting model, especially in rural and remote communities, was particularly noted.

Members also emphasised the importance of including diverse voices, particularly those of Aboriginal and Torres Strait Islander people and communities, in commissioning processes, and advocated for community co-design and respectful engagement to ensure cultural relevance and effective service delivery. Cultural representation, lived experience input and community co-design were deemed essential to ensuring these reforms realised departmental and sector ambitions.

CAFFSA members also urge DSS to consider financial concerns in the construction of the funding parameters of the reformed program. There is an opportunity to address long-standing concerns that impede flexible, localised responses. By way of example, the Communities for Children commissioning through a subcontractor partnership model aims to leverage specialist providers for niche local support areas. However, the

commissioning approach does not adequately account for the financial sustainability of subcontracted organisations. Funding allocations cover direct service delivery but fail to include essential overheads such as corporate governance costs, rent, and wage increases aligned with industry standards.

Over time, these subcontractors experience mounting financial pressure, making service delivery economically unviable. As a result, several providers withdraw or close, creating significant gaps in community support, particularly in specialised areas where dependency has grown. For example, last year a Circle of Security Parenting Group for father's who had their children removed from their care had to close. This group was a safe place where fathers could share, learn and build their parenting capacity without shame and stigma. The disruption of closing this service not only affected vulnerable individuals relying on this service to regain care of their children, but also undermined broader sector stability and trust in partnership-based commissioning.

Prioritisation of Investment and Early Intervention

CAFFSA membership are strongly in agreement that reform must prioritise early support and prevention. This is consistent with the long-standing policy and advocacy position of the CAFFSA Board and membership in South Australia. Great concern was also expressed, however, that support for families at risk must not be reduced as an outcome of this reform, noting the need to address current and growing service gaps for high-need families in South Australia and across the country. For example, unmet need for intensive family support in South Australia (understood to be currently at least 54% of eligible families) means that demand pressures are pushing families (and agencies) into tertiary systems and responses.

Defining Families

Several consultations CAFFSA members joined, raised the importance of including much inclusive concepts of 'family' including extended family, kin and networks of support. It was also argued that existing family and relationship services (FaRS) that support and strengthen relationships between couple relationships should also be considered under a broader definition of 'family.'

Defining Outcomes

Outcomes should reflect the strength and resilience of communities as well as families, given the known benefits to child and family wellbeing. In the context of Aboriginal social and emotional wellbeing, it is well understood that healthy outcomes include connection to county, cultural identify, cultural resilience, and language.

A range of members have asked for greater clarity in relation to how concepts such as 'healthy' and 'resilient' will be defined and what will be used as measures, while others

raised the silence on the issue of the safety of children and young people and urge further discussions about this matter. Recognising the diversity of families in all their forms and structures is an important factor in ensuring just and inclusive services.

Defining Early Intervention

CAFFSA members urge a reframing of 'early intervention' as 'early support', suggesting we need much greater sensitivity when using the word 'intervention' with vulnerable groups, and particularly with Aboriginal and Torres Strait Islander families and communities, given the history associated with that terminology. It was noted that many families in distress may not proactively seek help, compounding the need for client-facing roles to facilitate warm referrals, especially for families at risk of child protection involvement. Further barriers to families receiving much needed early support include referral-only federal programs (such as CAPS, FINS) and mismatches between federal and state requirements. It was further noted that early intervention should be understood as:

- ✓ responding early in presentation of issues
- ✓ respond beyond age-based definitions, and
- ✓ span, at the very least, the 12–25 age group where risk is high

Recognising Service Gaps and System Barriers

Members raised concerns about gaps in services for older children and young people, the disconnect between federal and state programmes, and the need for better integration and referral pathways to homelessness, specialist services, and particularly mental health support.

Data and Partnership Approaches

The importance of using data to understand unmet need, avoiding duplication of services, and fostering partnerships among organisations to ensure consistent support and reduce postcode-based disparities was strongly supported.

Joined-Up Systems, Place, Data and Decision-Making

The Importance of Community Development

The foundational role of community development and the importance of considering the cost to communities when transitioning providers was examined during this section of the consultation, with members advocating strongly for the inclusion of local voices and outcomes in programme design. The risks of fragmented tendering and duplication were discussed, with uneven timelines between the grants subject to this reform and other relevant Federal grant programs and initiatives, such as the Attorney-General's Department Family Relationships Services Program and the Department for Health and

Ageing's newly established Thriving Kids Initiative, were highlighted, with a request that greater integration of these be considered.

Data Interpretation and Indigenous Sovereignty

Membership urges DSS to avoid deficit perspectives in data analysis and to uphold Indigenous data sovereignty, ensuring that Aboriginal and Torres Strait Islander communities control both the narrative and use of their data.

Self-Assessment and Risk Screening

The adoption of self-report risk screening tools to empower families in assessing their own needs, supporting a shift towards family-led decision-making and more accurate identification of risk is seen as an important opportunity that could be harnessed in this reform.

Aboriginal Leadership, ACCO Voice and Funding Transition

CAFFSA members uniformly support increasing Aboriginal Community-Controlled Organisations' (ACCOs) role in service delivery, noting it is consistent with their support of Priority 2 under the Closing the Gap National Agreement and the Safe and Supported Action Plan. CAFFSA recognises that better outcomes are achieved for Aboriginal and Torres Strait Islander children and families through a strong and sustainable ACCO sector that can deliver high-quality services to meet the needs and aspirations of Aboriginal and Torres Strait Islander people. It also accords with evidence regarding cultural safety, and the principle that Aboriginal communities are best placed to design and lead services for their families.

Members wish to register concern that the proposed transition is to be funded by reallocating resources from existing NGO providers rather than through additional investment. Given the promotion of choice necessitates designing and delivering services and programs that maximise cultural safety and responsiveness, increased investment in ACCOs should be ***additional*** rather than reallocated from existing NGO funding. This area has been chronically under-funded for many years. While the sector strongly supports greater funding for ACCOs, a genuine commitment to reform at the Federal level should incorporate resourcing to meet need, rather than delegating the discomfort of potentially limiting funding for currently successful programs to achieve transition.

This "either/or" approach does not address the chronic underfunding across the sector, risks creating competition, reducing service capacity, and undermining genuine choice for Aboriginal families. Many Aboriginal families currently choose to access NGO services for a range of reasons, including (but not limited to) trusted relationships, local cultural safety, specialised therapeutic supports and privacy. Removing resources from

these organisations diminishes—rather than strengthens—self-determination by reducing choices Aboriginal people make.

CAFFSA membership also felt very strongly that government—rather than the sector—should take responsibility for designing and resourcing an equitable transition, capacity building and ensuring genuine choice for Aboriginal families. Without clear commitment from DSS, there is a risk that NGOs and ACCOs will again be left to negotiate redistribution among themselves, repeating past patterns that create conflict, strain collaboration, and destabilise a system already managing workforce pressures, rising costs and regulatory reform.

A sustainable approach requires new, dedicated investment to grow ACCO's infrastructure and ability to 'scale up' while maintaining the viability of existing NGO services that also provide services to Aboriginal children, young people, families and communities. The reform goals of DSS —flexibility, integration, outcomes focus, and community-led design—can only be achieved through a 'both/and', rather than an 'either/or' model that expands the overall funding envelope. CAFFSA urges DSS to commit to an adequately funded transition that strengthens ACCOs, protects service continuity, and upholds the right of Aboriginal families to choose where they receive support.

Reform Implementation Timeline

Members have raised concerns that the proposed six-month notification period of outcome (from August 2026 for new agreements to be in place by January 2027) does not accord with financial and business planning processes that ordinarily will have been completed before the end of FY26.

Similarly, a longer extension period beyond January 2027 would help to avoid the real risk of service disruption or failure in rural and remote areas. Rushing the consultation and re-contracting process to meet an arbitrary deadline undermines the successful outcomes the reform is attempting to achieve.

Closing Remarks

CAFFSA is grateful for the opportunity to contribute the range of views of our membership in considering the reforms proposed by in *A New Approach to Programs for Families and Children*. The contribution of the services and responses funded through the proposed new approach contribute significantly to the wellbeing of children, young people, families (in the broadest definition) and communities across the nation and CAFFSA would be pleased to contribute further detail on any aspect of this submission. Should this be required, contact details are as follows:

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