

Submission

To	Department for Child Protection
Topic	State Strategy for the Safety and Support of Children and Young People
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About

We are an inclusive not-for-profit community service provider working alongside more than 110,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities. Uniting Communities provides a range of services within the child protection system in South Australia. These include:

- **Jo's:** Provides therapeutic residential care for young people under the Guardianship of the Minister, supporting safety, stability, healing and positive developmental outcomes.
- **Newpin (New Parent and Infant Network):** An intensive therapeutic reunification program that supports families to break cycles of abuse and neglect, strengthen parent-child relationships, and create safe and nurturing environments for children to return home.
- **Specialist Foster Care:** Provides therapeutic family-based care for children and young people with complex needs who are unable to safely live with their families, supporting stability, healing and positive long-term outcomes.
- **Ruby's Reunification Program:** Combines short-term accommodation, therapeutic counselling and family support to help young people and their families address conflict, improve relationships and achieve safe reunification where possible.
- **GRIT:** Early intervention counselling and prosocial group work for young men and non-binary youth who have experienced family, domestic or sexual violence, or who are using or at risk of using it.
- **Family by Family:** Peer-led family support that connects families experiencing challenges with families who have navigated similar experiences.

Submission to State Strategy for the Safety and Support of Children and Young People

Uniting Communities thanks the Department for Child Protection for the opportunity to provide feedback on the draft *State Strategy for the Safety and Support of Children and Young People*. We strongly support the Strategy's public health approach, which is essential to reducing over-reliance on the out-of-home care system. Wherever it is safe to do so, families are the best place for children and young people to grow, develop and maintain connections to family, culture, community and support networks. Early investment and timely support can strengthen families, prevent harm and reduce the need for statutory intervention.

The Strategy provides a positive vision for the child and family support system for improving outcomes for children and young people. Its success will ultimately depend on effective implementation, accountability and oversight. Subsequent agency plans and ongoing consultation will therefore be critical to translating the Strategy into meaningful change, supported by appropriate resourcing and future budget commitments.

We believe the Strategy could be further strengthened in several areas. In particular, we are very concerned by the absence of a clear focus on reunification and family preservation within the Strategy. Given these are central to improving long-term outcomes for children and families, their omission represents a significant gap in the proposed plan. In order to improve outcomes for children in out-of-home care there needs to be a strong emphasis on preserving and restoring family relationships. We are also concerned that separate agency plans may reinforce siloed approaches without stronger cross-government governance and accountability mechanisms. Finally, the Strategy would benefit from greater recognition of the needs of culturally and linguistically diverse (CALD) children and families.

Our key recommendations:

- **Include reunification and family preservation as core objectives throughout the Strategy, particularly within Positive outcomes for children in care. Safely preserving and restoring family relationships should be a central goal of the child protection system. The absence of reunification from the current Strategy represents a significant gap in its outcomes, measures and indicators of success.**
- **Ensure agency plans are developed through public consultation and supported by governance mechanisms that promote cross-agency accountability, collaboration and coordinated responses for children, young people and families.**
- **Include a commitment to strengthen triage and care coordination pathways for vulnerable children and families, supporting earlier access to appropriate services and reducing escalation to statutory intervention.**
- **Expand the proposed success measures to include reductions in the number of children in out-of-home care, and successful reunification outcomes.**

- **More clearly distinguish significant harm from unmet need, recognising that poverty, housing instability and disadvantage should be addressed through family support and early intervention responses rather than statutory intervention.**

Consultation

Strong families, thriving communities & supporting the most vulnerable children and families

Prevention and early intervention

A key preventative mechanism for supporting families in South Australia will be increased investment in family support services for vulnerable children and families to address current gaps in the system. Demand for intensive family support services frequently exceeds available capacity, creating bottlenecks and missed opportunities to address concerns early.

When notifications are made to CARL but do not meet the threshold for a statutory response, there is currently no effective mechanism to coordinate support and ongoing engagement with those families. Many families who do not require a statutory response would nevertheless benefit from targeted community-based services, but are not consistently connected to the right supports at the right time.

To achieve the Strategy's vision of "transformative, enabling systems", there is a need for a central triage and care coordination function that works across government departments and community services to support appropriate referrals, service navigation and coordinated support for families. Such a model would help break down silos where multiple services and departments are working with the same family, ensuring responses are coordinated and complementary. A statewide triage and care coordination service could proactively connect families with appropriate supports, facilitate referrals, and provide case coordination to address emerging concerns before they escalate. A two-pronged approach could include both a general access pathway for families seeking support and referral pathways from CARL for families identified as vulnerable.

Recommendation: *Establish a statewide triage and care coordination system for vulnerable children and families.*

The gap for adolescents

The Strategy refers throughout to "children and young people" but gives no attention to adolescents as a distinct cohort. This is concerning given adolescence is a period where multiple risk factors can converge and where prevention and early intervention responses are particularly important.

A significant gap exists for adolescents who are excluded from the family home, whether due to experiencing violence from a parent or because of adolescent violence towards a parent. In both circumstances, dedicated responses are limited and intervention orders are often relied upon despite being designed primarily for adult circumstances. These adolescents frequently sit outside child

protection and out-of-home care systems, resulting in limited visibility within policy, service responses and outcome measures.

Recommendation: *Explicitly recognise adolescents as a distinct cohort within the Strategy and include dedicated outcomes, measures and responses for adolescents who are excluded from the family home without entering care.*

Interconnected issues

Families in contact with the child protection system often experience challenges relating to housing, alcohol and other drugs (AOD), mental health, and family and domestic violence. These issues are frequently interconnected and can contribute to child protection involvement, highlighting the need for early intervention and family preservation supports that address the needs of the whole family.

While the Strategy briefly recognises these areas within targeted prevention supports, there is an opportunity to strengthen their integration across other priority areas and targets. A more coordinated and holistic approach, both before and after a child's removal, would better support families to address underlying issues, improve safety and wellbeing, and create stronger pathways to family preservation and reunification where possible.

Recommendation: *Strengthen the integration of child protection, family violence, mental health, alcohol and other drugs, and housing responses across Strategy priorities and targets.*

Distinguish significant harm from unmet need

We support a child and family-centred approach to safety that distinguishes between significant harm and unmet need, recognising that not all adversity requires a statutory child protection response. The Strategy should more clearly articulate this distinction. Factors such as poverty, housing insecurity and limited access to services should not, in isolation, result in child protection involvement. However, there are currently limited indications within the Strategy of how the child protection system intends to prevent unmet need from escalating to a statutory response.

Distinguishing unmet need from significant harm requires a holistic assessment of both the child and their family. This should include consideration of the underlying causes of concerns, including systemic barriers and disadvantage; parents' efforts and capacity to meet their child's needs; the direct impact on the child; and whether alternative responses or specialist supports may be more appropriate, such as family and domestic violence, housing, mental health or alcohol and other drug services.

Recommendation: *More clearly distinguish significant harm from unmet need within the Strategy and recognise the role of poverty, disadvantage and systemic barriers in driving child protection involvement.*

Unmet Need

There is currently a gap in identifying and measuring unmet need, with relevant data and insights dispersed across government departments and services. Information gathered through CARL, Health,

DHS and community services could provide a more comprehensive understanding of unmet need and better inform policy, service planning and investment decisions. Improved information sharing and coordination across systems would support the Strategy's focus on prevention and early intervention by enabling concerns to be identified and addressed before they escalate.

Recommendation: *Strengthen data and information sharing across government and non-government agencies to improve identification and measurement of unmet need and support the Strategy's prevention, early intervention and service planning objectives.*

Working collaboratively with families

The Strategy commits to supporting families to participate in decisions affecting their children and build on their strengths and capacities. We strongly support this commitment and believe there is an opportunity to further strengthen collaborative practice within the child protection system, both as a preventative measure and to support successful reunification. Meaningful family participation in case planning and safety planning is critical to achieving sustainable outcomes for children and families. However, many parents report limited opportunities to have their voices heard and contribute to decisions affecting their family, which can impact trust, engagement and shared ownership of plans.

Strengthening a partnership-based approach that recognises families as active participants in planning and decision-making would support engagement and improve the implementation of agreed actions. Improved practice guidance, clearer shared goals and greater accountability for meaningful family participation would help foster stronger relationships between families and DCP, leading to better outcomes for children and families.

Recommendation: *Strengthen commitments to meaningful family participation in decision-making, case planning, safety planning and reunification processes.*

Family Group Conferencing

Evidence indicates that Family Group Conferencing (FGC) can help prevent children entering out-of-home care and support reunification where children have already entered care. FGC should be prioritised both before and after removal, providing opportunities for families and their support networks to contribute to decision-making and safety planning.

While FGC can be a valuable mechanism for family-led planning and decision-making, we have observed variation in how it is implemented. Where families are not meaningfully engaged, the intended benefits of collaboration, shared ownership and early intervention may not be fully realised. Strengthening practice guidance and promoting more consistent implementation would help ensure FGC supports genuine family participation and creates additional opportunities to safely prevent removal and support reunification. FGC should complement, rather than replace, intensive wraparound supports where required.

Recommendation: *Include a commitment to the earlier and more consistent use of Family Group Conferencing before and after children enter care, with clear expectations for genuine family engagement, shared decision-making and collaborative planning.*

Consistent practice

The Strategy should include a clear commitment to supporting consistent implementation of the new Act across the child protection system. Given the significant powers exercised under child protection legislation, families should be able to expect equitable, evidence-based and proportionate responses regardless of where they live or which worker is involved in their case.

Consistent implementation will require robust training, clear practice guidance and ongoing professional development. Guidance should support the practical application of key aspects of the Act, including the guiding principles, removal thresholds, active efforts and reunification. Active efforts must translate into thorough investigations of a family's circumstances and the exploration of all reasonable options to prevent unnecessary statutory intervention. Child Protection Officers should have a strong understanding of child and adolescent development and undertake holistic assessments that consider unmet need, family strengths, protective factors and alternative responses alongside harm. Application of the best interest's principle should be informed by these assessments, recognising that while safety is always considered, removal is not always the response most likely to support a child's long-term wellbeing.

Assessment and decision-making

While the CARL assessment process is generally consistent, variation in how concerns are subsequently interpreted and responded to remains a key challenge. Similar family circumstances can lead to different outcomes across offices and practitioners, creating inconsistency in decision-making. Clear practice guidance and a shared understanding of significant harm, risk and unmet need are needed to support equitable and proportionate responses.

Recommendation: *Include a commitment to consistent implementation of the Act, supported by practice guidance, training and professional development on the guiding principles, removal thresholds, active efforts and reunification.*

Judicial Decision-Making

The successful implementation of the Act will require a shared understanding of its principles across all parts of the child protection system, including the courts. Judicial officers should be engaged in implementation activities, including guidance, training and other opportunities that support consistent interpretation and application of the Act.

Given the significant and long-term impact of decisions such as care orders, it is important that courts have access to a holistic picture of a family's circumstances. Decision-making can be strengthened by considering information from a broader range of professionals and services involved with the family, ensuring balanced consideration of family strengths, progress, supports and risks. This would support more informed decision-making and contribute to better outcomes for children and families.

Recommendation: *Include actions within the Strategy to support judicial engagement in implementation of the Act and promote consistent understanding of its principles across the child protection and court systems.*

Positive outcomes for children in care

Reunification

While the Strategy includes a section on positive outcomes for children in care, there is no corresponding focus on reunification or family restoration. The absence of reunification initiatives, services, measures or goals for children who have been removed from their families is a significant gap in the Strategy. Reunification should be a prominent objective for children in care, supported by active efforts and coordinated supports throughout a child's care journey. Achieving long-term success in the child protection system requires reducing both the number of children entering out-of-home care and the time children remain in care where reunification is possible. There is a significant opportunity to strengthen South Australia's reunification and family preservation system to address current gaps and improve outcomes for children and families. For example, there remains a gap in the availability of family preservation and restoration supports for families involved in the out-of-home care system.

Reunification should be treated as an ongoing process, with families provided meaningful opportunities to address concerns and demonstrate progress over time. Consistent, transparent and restoration-focused practice is needed to support equitable decision-making and ensure families are assessed on their strengths, progress and capacity for change, alongside consideration of risk.

Achieving safe reunification also requires coordinated therapeutic, practical and parenting supports, with decisions informed by both clinical assessments and the experience of professionals and services with direct knowledge of the family's circumstances and progress. Involving a range of professional perspectives can strengthen decision-making and support more balanced assessments of risk, safety and opportunities for family restoration.

Recommendation: *Include reunification and family preservation as core objectives throughout the Strategy, with specific goals, measures and actions to support family restoration for children in out-of-home care.*

Parent advocacy and support

The Strategy currently does not include parent advocacy and support. Parents require access to independent advocacy and case management both before and after a child enters care. Prior to removal, these supports can help parents understand concerns, navigate processes, access services and participate meaningfully in decision-making. Following removal, parents are often expected to navigate a complex service system during a period of significant stress and trauma, which can create barriers to addressing concerns and progressing towards reunification. Strengthening access to independent

advocacy and case management would support family engagement, participation in decision-making, and reunification outcomes.

Recommendation: *Expand access to independent parent advocacy and case management before and after children enter care to support engagement, participation and reunification outcomes.*

Foster care

Addressing pressure on the foster care system requires action across the continuum of care, including preventing unnecessary removals, prioritising reunification wherever safe and possible, and strengthening support for foster carers to improve retention. Better support for carers, consistent with the Statement of Commitment, would help retain experienced foster carers and support placement stability for children who cannot be reunified.

The Statement of Commitment for Foster and Kinship Carers is now reflected in the new Act, making its consistent implementation essential. Carers continue to report varying experiences across DCP, with some feeling insufficiently supported or consulted in decisions affecting the children in their care. Clear practice guidance, training and accountability mechanisms are needed to ensure the principles of support, consultation and respect are consistently applied. Strengthening implementation of these commitments would improve carers' experiences, contribute to foster carer retention, and help maintain a stable and sustainable foster care workforce.

Recommendation: *Include a stronger commitment to supporting foster and kinship carers through consistent implementation of the Statement of Commitment.*

Transformative enabling system

Agency plans

We are concerned that separate agency plans may create silos rather than strengthen cross-government collaboration, potentially missing opportunities for more integrated and coordinated responses. Additionally, there is no clear governance structure to oversee collaboration between departments and ensure complementary approaches, reducing opportunities for innovative, wraparound responses for families. This is particularly important where families are interacting with multiple government systems and services. Greater shared accountability and coordinated planning across agencies are needed to support better outcomes for children and families.

As highlighted above, there is also a need for greater parent advocacy and case management to support families navigating a complex service system, particularly where responsibilities and supports span multiple departments.

While we recognise that the prescribed agencies for plans are those identified within the Act, it will be important that other departments, including the Department for Housing and Urban Development, are also accountable for shared commitments. This is particularly important given the strong relationship between housing instability, ongoing crisis, cumulative harm and child protection involvement.

Recommendation: *Include governance mechanisms that promote cross-agency accountability, collaboration and coordinated responses for families with complex needs.*

Better Collaboration Across the System

Improving outcomes for children and families requires stronger collaboration between child protection, health, education and community services. Greater sharing of information, expertise and training across sectors would support more consistent decision-making and help ensure families receive the most appropriate response, recognising that many concerns are better addressed through health, education or community-based supports than a child protection response.

Community services should also be supported with flexible funding and referral pathways to respond to unmet need early. Practical assistance such as food, medication or transport vouchers, alongside coordinated therapeutic, practical and parenting supports, can help stabilise families, address underlying issues and reduce the likelihood of child protection involvement.

Recommendation: *Improve collaboration between child protection, health, education and community services to support more coordinated and effective responses to vulnerable children and families.*

Conclusion

Uniting Communities appreciates the opportunity to provide feedback on the draft *State Strategy for the Safety and Support of Children and Young People*. We welcome the Strategy's adoption of a public health approach to child protection and its focus on prevention and early intervention. We believe the Strategy would be strengthened by an explicit focus on reunification and family preservation particularly within *Positive outcomes for children in care*. Given reunification is a key objective of the Act and a crucial pathway to improved long-term outcomes for children and families, its absence from the Strategy's goals, outcomes and measures is a significant omission.

We also encourage the inclusion of strong implementation, governance and accountability mechanisms to support consistent application of the Act and ensure the Strategy's objectives translate into meaningful outcomes for children and families. We look forward to ongoing consultation on agency plans and implementation arrangements to support effective delivery of the Strategy.