



## Submission to the Commission of Inquiry Recommendations Scrutiny Committee

February 2025

### Introduction

Mission Australia is a national Christian charity that has been standing alongside Australians in need since 1859. We work to end homelessness, provide housing, assist struggling families and children, address mental health issues, fight substance dependencies, support people with disability and much more. Together, we stand with Australians in need for as long as they need us.

In 2023-24, across Australia we supported over 160,000 people through 477 programs and services across several areas including homelessness, housing, strengthening communities, children and families, youth, employment and disability. In Tasmania, we supported 23,420 Tasmanians on their journey towards independence, including over 10,000 people through our children and families services.

We work closely with vulnerable young people with complex needs, including through our Targeted Youth Support Service (TYSS), YouthBeat programs, Integrated Family Support Services (IFSS) including leading an alliance of IFSS providers, and our work on the Strong Families Safe Kids, Advice and Referral Line.

Mission Australia welcomes the opportunity to provide a submission to the Commission of Inquiry Recommendations Scrutiny Committee. Our submission focuses on four key areas that we wish to highlight to the Committee for consideration in the implementation of the Commission's recommendations:

1. Prevention and early intervention approaches to keep children and young people out of institutional settings.
2. Expansion of child safe measures to all organisations working with families, children and young people at high-risk.
3. Child and youth involvement in service and policy design.
4. Reform of commissioning processes to support sustainable, high-quality service delivery and the transition to a prevention-oriented system.

In particular, we wish to express our concern to the Committee that the focus of policy responses to childhood sexual abuse in Tasmanian institutional settings – via the Commission of Inquiry's recommendations and the *Change for Children* Strategy and Action Plan – is heavily focused on post-

harm measures at the expense of early intervention and prevention measures that can and should play a significant part in helping people avoid involvement in statutory and crisis responses.

## Summary of recommendations

That the Tasmanian Government **invest in early intervention and prevention** services that reduce harm to children and decrease the demand for high-cost crisis services.

That the **implementation of Recommendation 9.3** be broadened as outlined in our submission.

That the Tasmanian Government commit to **co-design with children and young people as a core principle** of policy/ program/ service design and delivery.

That the Tasmanian Government:

- **Fund the full cost of service delivery**, including infrastructure, management and administration costs, and appropriate indexation.
- Actively **involve community service organisations in determining the full cost** of service delivery to ensure arrangements are realistic, transparent and reflect evidence.
- Schedule opportunities prior to the beginning and during the life of contracts for government and community service organisations to **assess appropriate resource allocation**, including changing costs over time.
- Increase the use of **long-term contracts** when commissioning and recommissioning services, to at least seven years for most programs and 10 years for place-based programs in communities with persistent and entrenched disadvantage.
- Provide a minimum of **two years for any extensions** and issue official notice as soon as possible for contract renewals or retenders – at least six months before the end of the contract.

## Prevention and early intervention

Mission Australia is concerned that the Commission's recommendations have been narrowly focused on preventing harm once young people are already in institutional settings. In our view, policy approaches that prevent young people from becoming involved in youth justice and out-of-home care in the first place are vastly preferable from the perspective of both human and economic costs.

Early intervention looks after children when they need it and prevents children and families becoming caught in harmful cycles that exacerbate their trauma. Programs targeted to children, young people and their families at increased risk of involvement in justice or out of home care settings should be prioritised, supported by policy reform that allows for early identification of the at-risk cohort and cross-agency intervention where needed. This has been extensively noted in reviews of Australian policy settings:

*There have also been numerous inquiries across all jurisdictions in Australia, including Royal Commissions, investigating child protection and child justice systems. Many of these have*

*recommended greater investment in prevention and early intervention, combined with the implementation of evidence-based reforms that could make positive differences to child wellbeing ... and that prevention and early intervention requires coordinated action from systems across health, education and social services.*<sup>1</sup>

Recent Australian research has confirmed that early intervention programs are very effective at preventing later involvement in youth justice. Longitudinal analysis of data from the Pathways to Prevention Project showed that, among children who participated in an enriched preschool program coupled with a family support program, none went on to be involved in serious youth crime. Participation in the enriched preschool program alone reduced youth offending by 56%.<sup>2</sup>

Early intervention and prevention measures not only avoid negative outcomes for individuals and families, but also achieve significant economic outcomes for governments and society.

Funding invested in early intervention and prevention saves people from needing a range of expensive crisis services including out-of-home care, emergency department, and justice interventions.<sup>3</sup> Funding for early intervention and prevention is also likely to achieve a high return on investment. An analysis of Federal Government-funded family and relationship services found that benefits outweighed costs for all services, calculating a benefit-cost ratio of 8.67. In other words, for every \$1 spent, there were \$8.67 worth of benefits including long-term benefits to age-appropriate development and improved wellbeing.<sup>4</sup>

Both children's wellbeing and economic resources could be saved by preventing escalation into the tertiary system. Early intervention and prevention services, such as IFSS - which focuses on working with parents to support children's wellbeing - make a critical contribution to the welfare of Tasmanian children and need further resourcing to meet demand.

## Recommendation

That the Tasmanian Government **invest in early intervention and prevention** services that reduce harm to children and decrease the demand for high-cost crisis services.

## Child safe measures

Having the highest standards of safety and wellbeing for children and young people is a core commitment for Mission Australia. We have a dedicated Child and Youth Safe team who collaborate

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<sup>1</sup> Australian Human Rights Commission. 2024. [‘Help Way Earlier!’ – transforming child justice for safety & wellbeing.](#)

<sup>2</sup> Allen, J.; Freiberg, K; Homel, R. 2024. [We tried a different preschool curriculum to prevent youth crime. Checking in 20 years later, it worked.](#)

<sup>3</sup> Australian Human Rights Commission op. cit.

<sup>4</sup> The Centre for International Economics, prepared for Family and Relationships Services Australia. 2023. [Family and relationship services economic evaluation: Using cost-benefit analysis to assess the value of services.](#)

with service delivery staff, managers, and the broader organisation to continuously strengthen practices in accordance with the National Principles for Child Safe Organisations. Ongoing improvements of our child and youth safe practices is overseen by our Child and Youth Safe Clinical and Care Committee ensuring our Tasmanian services are positioned to best meet the National Principles for Child Safe Organisations and State-specific Standards.

Mission Australia draws attention to recommendation 9.3 which outlines new funding agreements with non-government out of home care providers that set quality and accountability requirements. Mission Australia broadly supports recommendation 9.3 and recommends that its implementation be broadened to include:

1. Establishing minimum qualification standards for staff in key roles, along with mandatory training requirements, supported by adequate funding levels to meet these needs.
2. Ensuring that training for staff includes casework interventions, assessments, risk management, risk of harm and responding to disclosures, supplemented with ongoing professional development in areas such as problematic and harmful sexual behaviour, mental health first aid and other emerging needs. This will ensure that staff are equipped with the knowledge to intervene and appropriately support children and young people to prevent and respond to harm or risk of harm.
3. Expand the Commission's recommendations from residential and out of home care providers to include prevention and early intervention services who are working with high-risk families, children and young people.
4. Implement evidence-based, trauma-informed therapeutic models of care such as Therapeutic Crisis Intervention (TCI) as a minimum standard of practice. Using evidence-based models such as TCI supports a trauma-informed environment for children and young people. This aligns with Principle 7 of the National Principles for Child Safe Organisations.

## Recommendation

That the **implementation of Recommendation 9.3** be broadened as outlined in our submission.

## Child and youth involvement in service and policy design

Services and policies that affect children and young people should support meaningful, positive participation. Any service co-design or advocacy groups should be diverse and include those who are living through the relevant experiences. Participation from children and young people can both improve the design outcomes as well as improving individual's sense of self-efficacy and control.<sup>5</sup>

The core principle of service design and delivery that should underpin keeping Tasmanian children safe is 'nothing about me without me' or, in other words, co-design of programs, policies and systems with

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<sup>5</sup> Victorian Commission for Children and Young People. 2021. [Empowerment and participation: A guide for organisations working with children and young people.](#)

the children and young people who will use and be affected by them. Every element of policy, program/service and system design must be undertaken in alignment with this principle, from planning to development to implementation to evaluation.

We believe that these principles and practices should be applied across the human services sector by government and non-government organisations alike.

We often see 'co-design' used to describe a process of government and service providers working together. Certainly, service providers should be involved in these processes, to leverage the wisdom and experience of their practitioners and to build on their evidence and data holdings. However, co-design must necessarily also include the people and communities who are the intended beneficiaries. There are also many examples of expressed good intention for co-design in policy and service development, but in almost all cases the reality fails the promise: the solutions are predetermined, participation turns out to be only consultation, and the design parameters meet funders' - not users' - needs.

Co-design is a way of designing with, not for, people. It involves sharing power, prioritising relationships, using participatory methods and building capability from the beginning. It is a mindset, framework and a range of methods and tools that involves the people who use or are affected by policies, products or services in their design and development. To do well, co-design requires investment of time and resources and true commitment.

When we engage in co-design at Mission Australia, we bring together people with lived experience and professional expertise to understand and clearly define the issue, ideate and develop potential options, and test, iterate and implement ways of operating. Co-design leads to better outcomes because the people directly impacted by the issue are involved in coming up with the solution.

Co-design needs to be considered from a broad systems perspective. In addition to working with communities on individual policy/service/program responses (if that is the response that the community wants), it is imperative to work with people and communities on the design of the broader system settings, to ensure that the interaction of policies, programs, funding and so on makes sense for the community and that the various elements are not in conflict.

Our human-centred design work at Mission Australia also builds on the following characteristics, which we recommend also be taken up by in the implementation of the Commission's recommendations:

### **Participation**

- Facilitating a diverse range of stakeholders to make sure designs benefit from different perspectives.
- Including potential service users in the process where appropriate so that designs best meet their needs/wants.

### **Empathy**

- Spending time understanding the needs, experiences and behaviours of service users.

- Understanding the challenge from different perspectives before considering possible opportunities and solutions.
- Approaching all aspects of the design of services, including the ‘touchpoints’ for people accessing services as well as the processes behind the scenes.

### **Creativity**

- Valuing different styles of thinking to ensure a wide range of possible service solutions are considered before choosing the most viable and feasible for the context.
- Using creative tools and methodologies that enable ‘thinking outside the box’.
- Building upon existing evidence of what works.
- Embracing new ways of approaching old problems.

### **Iteration**

- Spending time ‘testing’ ideas to make sure final service models best meet the needs of service users.
- Questioning assumptions along the process so that services are based on what actually works for service users

Mission Australia has extensive experience in working with children and young people in co-designing services. We would welcome the opportunity to work with the Tasmanian Government on developing and implementing co-design approaches with children and young people.

### **Recommendation**

That the Tasmanian Government commit to **co-design with children and young people as a core principle** of policy/ program/ service design and delivery.

### **Reform of commissioning processes**

Services such as the Supported Youth Program, TYSS and IFSS, which are designed to prevent escalation into statutory services have not received increased funding (except CPI) for over a decade. Over this period there has been considerable social change, including as a result of the COVID-19 global pandemic, and increasing demands on these nominally ‘early intervention’ services to work with children and families with very complex needs who are at high and immediate risk of entry into the child protection or juvenile justice systems.

Services are operating at capacity across the sector, diminishing opportunities to triage and direct children and families into the services they need. This is directly leading to early intervention services needing to work with high complexity cases instead of the early intervention and prevention activities they are funded to deliver. Further information is provided at **Appendix A**.

Commissioning reform, including introducing longer-term grant funding that reflects the true cost of service delivery, is needed to overcome these challenges and ensure that community service organisations are adequately funded to meet the demand for services.

### **Provide grants that reflect the real cost of service delivery**

Adequate funding must include the true cost of delivering quality services, including direct and indirect costs.

Government funders typically and rightly require service providers to meet core governance contractual requirements such as finance, auditing, essential HR functions, legal, IT security, WHS, risk management, procurement and property, compliance. On top of this, government funders are increasingly including a range of other important quality and compliance requirements into contracts, such as increased regulatory and accreditation compliance and Quality Assurance systems, redundancies and service closure costs, employment of staff members with living/lived experience, technology costs, costs specifically associated with increased cybersecurity risks, and costs associated with sub-contracting arrangements.

We acknowledge the importance of these requirements, but they must be resourced as genuine components of delivering a quality service. They all come at a significant cumulative cost to service providers. However, funders' program budgets limit what can be included as a direct cost of delivering the service, and almost always exclude the costs of meeting these new or increased requirements. Program budgets have remained stable over the years, while the contractual requirements have increased.

Mission Australia's experiences are supported by findings in the Social Ventures Australia and Centre for Social Impact report [Paying What it Takes](#). This report found that the average indirect costs of not for profits organisations (NFPs) across the human services sector was 33% of total costs, with significant variation between 26% and 47%. This contrasts with funding agreements which often only include indirect costs of between 10% and 20% of overall costs.

### **Provide long-term grant agreements and better grant extension arrangements**

Standard contract durations or extension durations of any less than three years are very difficult to manage, with implications for workforce stability and retention, longer-term planning and investment by service providers, and the ability to achieve outcomes in the provision of services to individuals and communities with complex needs. Funders also incur costs and administrative burden associated with continual tendering or extension processes.

Repeated short-term contract extensions are an even greater challenge than initial short-term contracts. This is a common experience across the community sector, often due to delays in procurement processes or review/evaluation processes that extend past a contractual end date, and is extremely detrimental to service and workforce stability. It is now common to see programs primarily operating on short-term extensions after the base contract has expired.

We recommend contract durations of at least seven years for most programs and 10 years for place-based programs in communities with persistent and entrenched disadvantage.

Ideally, between six and eight months should be given to negotiate grant variations and extensions. That would allow approximately two months to put a plan in place and between four and six months to execute it.

## Recommendations

That the Tasmanian Government:

- **Fund the full cost of service delivery**, including infrastructure, management and administration costs, and appropriate indexation.
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## Contact

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## **Appendix A Overview of relevant Mission Australia services and commentary on early intervention/prevention capacity**

### **Advice and Referral Line (ARL)**

The ARL was designed to focus on providing earlier intervention such as information and advice about service options, referral to another service, or in some circumstances if a child is considered to be at risk, the service may refer the matter to the Child Safety Service for assessment. Since the Strong Families, Safe Kids Advice and Referral Line was launched almost six years ago it has become evident that contact volumes to the service are far exceeding the service's capacity.

This current lack of sector capacity has resulted in cases being managed for extended periods within ARL without the capacity to refer out to appropriate supports.

### **Intensive Family Support Services (IFSS)**

IFSS was designed to provide early intervention for children and families at risk by supporting the family to identify, resolve and address issues affecting their parenting, thereby decreasing the likelihood of escalation into child safety services.

This program is also now working with highly challenging and complex cases. Front line workers are working with younger children, sexualised behaviour, and increasing impacts of mental health on children. While IFSS staff are capable of providing these services, they do not have the resourcing to take on both the current high level of complex care and still be able to effectively deliver the early intervention and prevention services to children at early risk of harm.

### **Targeted Youth Support Service (TYSS)**

TYSS offers intensive case management and therapeutic support for vulnerable young people aged 10-18 who are identified as having significant risk factors and who, without support, may require child protection or possibly escalation into the youth justice system.

This service is taking on young people suffering abuse and sexual violence who should be child safety clients because there is no service capacity in the system. Our staff are doing this work capably; however, as they are not resourced to do this highly complex work, it is reducing the time they can spend on effective early intervention and prevention work.