Save the Children Response to Draft Recommendations of the Productivity Commission

Overview

Save the Children is pleased to provide a follow-up response to the work of the Productivity Commission. We recognise the significant work that has gone into developing the draft recommendations in the Commission's draft report, and feel that there are many positive steps embedded in them.

We generally agree with many of the recommendations outlined (see below). However, we would encourage the report to increase its focus on the **mechanisms** required to achieve system-wide change, rather than the specific programs or practices that need to be delivered. While we appreciate the level of detail in the recommendations, we feel that there remains an opportunity to better articulate the big-picture principles of how the system could work to better support children and families in the Northern Territory.

In particular, we feel that there is real opportunity for better and more joint decision-making by funders, informed by community as well as expert advice on practices or interventions that work. We recognise the importance of developing mechanisms that reflect the needs of disparate communities across the Territory, and ensuring that funders are able to make wide-ranging decisions to ensure that children and families in the Territory get the early and culturally appropriate support they need, regardless of where they live.

We would also encourage an acknowledgement of the issues associated with providing services in remote areas of the Northern Territory, where there is often insufficient access to accommodation or other essential infrastructure. We would encourage the Commission to consider including a recognition of the costs associated with addressing this reality in its recommendations (please see our original submission section 3.4 on realistic funding in sparsely populated regional areas where service delivery costs are high).

Specific Responses

Draft Recommendations	Our Response Agree	
3.1 Harmonise Record Keeping Practices		
The Commonwealth and NT Governments should work together to develop a common method for: - reporting location data at a level of granularity that reflects service catchment areas - describing and categorising children and family services. This method should be adopted by all relevant government departments for the purpose of keeping records and reporting about government expenditures, as they relate to services for children and families. The improved expenditure and services data should be used by the NT Government as a basis for putting together a single and cohesive service list that covers all of the	Ref our original submission: 2.2 (data collection), 1.1 (community voice) We would encourage the inclusion of communities in this process, and ensuring community sovereignty of data.	

3.2. A public children and family service list

The NT Government should compile and maintain a single and cohesive service list that covers, at a minimum, children and family services funded by the Commonwealth and NT Governments in the Northern Territory.

The service list should be made available to the public, in a manner that allows members of the public and service providers to easily identify the services that are available in their communities.

At a minimum, the service list should contain information about:

- the type(s) of service(s) provided
- who is eligible to receive the service
- the service provider (name and contact details)
- when the service is available (days and hours of operation), including whether the service is provided on a permanent or visiting basis
- where the service can be accessed
- other requirements for attending (costs of attending, whether an appointment or booking is required).

Over time the service list could be expanded to include services funded through other means such as royalties and philanthropic sources.

6.1 Community Plans and Coordinated Funding Decisions

To deliver on their shared responsibility for funding children and family services in the Northern Territory, the Commonwealth and NT Governments need a new way of working together. This should include both governments genuinely engaging with NT communities, coming to a shared understanding of the issues affecting children and families, and jointly committing to solutions, with collective ownership and accountability for outcomes. To put this new way of working into practice, the Commonwealth and NT Governments should establish a formal process to coordinate funding.

- 1. Both governments should collate community-level data on services, outcomes (risk and protective factors) and current expenditure on children and family services in each community.
- 2. The regional representatives of both governments should share the data with communities, and in collaboration with communities develop a short community plan that: provides a snapshot of the strengths, needs and priority issues of children and families in the community gives the community a voice about which children and family services they would like to retain, change or replace. The regional representatives should provide the community plans to the Children and Families Tripartite Forum, together with a summary of overall expenditure, headline data and any other relevant information for each region.
- 3. Drawing on the community plans and regional summaries, the Children and Families Tripartite Forum should provide advice to both governments about funding arrangements for children and family services across the Northern Territory, including advice about funds pooling for particular locations or services.
- 4. The relevant Ministers of both governments should consider the advice of the Children and Families Tripartite Forum and then agree on which children and family services each is going to fund and in which locations, and publish details of the agreed funding. This process should be repeated as necessary, including when there are significant changes in government or community priorities, or when new funding becomes available

Somewhat Agree

We encourage an understanding of all the services available to children and families in the NT, and for that to be available in a range of formats/languages/media/easy English so that it is genuinely accessible to members of the public.

However, we encourage this data mapping to reflect the complexities of providing services in some communities, and that context and local knowledge is vital to developing a 'true' understanding of need and access. We acknowledge that while some services may appear as duplications on paper, they may provide different services, ensure access for different groups or have varied areas of expertise. Therefore, any mapping should include local knowledge to reflect the situation on the ground.

Somewhat Agree Ref: our submission 2.1 (data), 1.1/1.2 (community and youth voice)

Save the Children would strongly advise ensuring that this process is adequately funded, recognising that communities should be reimbursed for their time and expertise in developing and building plans.

While we strongly support ensuring that community and youth voices are central to decision-making, we would encourage a review of existing community insights and build from that to avoid 'consultation fatigue' and to ensure that consultation is matched by concrete actions. We recognise that many communities may feel that they are regularly consulted without definitive outcomes or actions, so would encourage any planning process to be tied to genuine change, actions and commitment to enact decisions made.

Ongoing review, check-ins and feedback with community should be built into engagement models to ensure that activities remain in line with community expectations and input.

Shared understanding of the issues, collective ownership and accountability for outcomes means that the government must cede some power to communities - this is a significant change and should be managed carefully as communities will need to (re-)build trust with the government and in the process.

Community Plans should involve genuine

and meaningful community engagement and leadership. All parts of the community should be involved and listened to, with time taken to fully understand individual communities being consulted. We would encourage the government to understand different groups' needs, how to integrate all community members' input and how best to collect and use information.

Community plans should be genuinely collaborative - not 'driven' by government, but facilitated by them without preconditions or pre-requisites (and where they do exist, these should be transparent and made clear from the beginning).

We would encourage the government to be ambitious, and to go beyond just giving a 'voice', but also consider how to embed community leadership and decisionmaking on their preferred services.

We would suggest that communities should be responsible for the presentation of their plans to the Tripartite Forum, rather than government regional representatives, to allow for two-way communication and interaction.

We would encourage the advice to government and government decisions to be transparent and accessible, and presented back to communities wherever possible.

6.2 An Expanded role for the Tripartite Forum

The Commonwealth and NT Governments should expand the terms of reference of the Children and Families Tripartite Forum to include providing advice on funding arrangements for children and family services across the Northern Territory, including advice about funds pooling for particular locations or services (as per draft recommendation 6.1). The Tripartite Forum should be adequately resourced so that it can fulfil its expanded role, and should manage any potential conflicts of interest

6.3 Better data on outcomes for children and families

To provide a more complete picture of the wellbeing of children and families in the Northern Territory, the Commonwealth and NT Governments should improve their data so that it is:

- outcomes-focused seeking to measure outcomes for children and families using available child-centred indicators across all the domains of child wellbeing
- collected, tracked and publicly reported at the community level wherever possible

Agree

We would also encourage a review of the composition of the Tripartite Forum should this recommendation be accepted, particularly considering whether service providers should be better represented or have an articulated advisory function. The selection process should ensure coverage across the range of service providers.

Agree

Ref: our submission 2.2 (data)

We would encourage the government to ensure community ownership of data and adhere to best practice when it comes to data collection, research and evaluation in Aboriginal communities.

7.1 INCREASING CERTAINTY IN FUNDING

The Commonwealth and NT Governments should set service contracts such that they provide adequate time and resources for service providers to establish their operations, and improve service quality and outcomes.

- Default contract lengths for children and family services should be set at a minimum of seven years.
- Funding should cover the full costs of providing children and family services in the Northern Territory (taking into account the higher costs of delivering services in remote areas, capital investments needed to support service delivery, and the cost of monitoring and reporting on service delivery outcomes). Where exceptions to default terms are applied, for instance for program trials, agencies should publish a justification of why an exception was made. Pilot programs will be expected to have shorter initial terms, but contracts for such programs should include a contingency for long-term funding if the pilot is found to be successful.

Contracts should also contain adequate safeguards to allow governments to remove providers in cases where they fail to deliver an adequate service despite ongoing support from governments to rectify issues (draft recommendation 7.3).

7.2 INCREASING CERTAINTY IN THE CONTRACTING PROCESS

To reduce uncertainty in funding of children and family services, the Commonwealth and NT Governments should:

- publish a rolling schedule of upcoming funding opportunities over (at least) the next twelve months
- allow sufficient time (a default of three months) for providers to prepare considered responses, including the development of integrated bids across related services
- notify providers of the outcome of funding processes in a timely manner, well in advance of the end of the existing contract.

Agree

Ref: our submission 4.1 (partnership), 4.3 (workforce development), 4.5 (upscaling successes)

We would encourage government to also build in costs that facilitate and allow for ethical/quality service delivery, within realistic timeframes to allow for genuine engagement and partnership. This includes time and funding for:

- partnership development;
- community co-design;
- annual increases pegged to salary and costs of services/goods; and
- workforce development/capacity building.

Agree

Ref: Our submission 3.1 (submission process)

We would encourage funders to remain flexible and committed to best practice in the contracting process. This includes providing adequate time post-award for partnership development and finalising coalition agreements if successful, based on the need and requirements of the project rather than default timeframes. Even 3 months may not be enough time to ensure that the agreements and other requirements of coalitions/partnerships are completed, so we would recommend that there is flexibility in implementation start dates to ensure that parties can ensure quality agreements amongst partners.

We would recommend that providers receive confirmation at a very minimum 3 months in advance of ending contracts, providing confirmation of cessation of service provision and/or opportunities to extend.

Where services will close, funders should take a lead role in informing the community and ensuring that communications are clear and timely regarding the reasons why services will end and any contingency planning

7.3 A RELATIONAL APPROACH TO CONTRACTING

The Commonwealth and NT Governments should adopt a relational approach to contracting, in which governments, service providers and communities work collaboratively towards shared outcomes. A relational contracting approach would involve:

- governments and service providers engaging in collaborative, regular reviews of service outcomes (after consulting users of the service) to assess progress against user needs, with continuous improvement and adaptation of services when required
- regular reviews that are proportionate to the dependency between governments and providers — for example, more regular reviews where there is lack of competition — and where the risk and complexities associated with the service are high
- management of the relationship with service providers at the local or regional level, using existing regional network staff and infrastructure already in place. Governments should ensure that regional network staff have the skills, capacity and authority to make independent decisions on minor changes to service delivery, and in consultation with head offices when more substantial changes are required.

7.4 AN EXPANDED ROLE FOR REGIONAL NETWORKS

The Commonwealth and NT Governments should ensure that their regional networks have the skills, capacity and authority to:

- undertake community planning and provide advice to the Children and Families Tripartite Forum (as per draft recommendation 6.1)
- adopt a relational approach to contracting at the local or regional level (as per draft recommendation 7.3).

7.5 TRANSITION TO ABORIGINAL CONTROLLED SERVICE DELIVERY

When commissioning children and family services primarily targeting Aboriginal and Torres Strait Islander people, the Commonwealth and NT Governments should ensure that service providers have the capacity to deliver physically accessible and culturally appropriate services.

- Funding decisions should take into account the characteristics and capabilities of providers (such as their cultural competence and connection to communities) and their ability to deliver improved outcomes. To support this, grant rules and guidelines should be adapted where necessary.
- Where an Aboriginal Community Controlled Organisation (ACCO) is expected to deliver better outcomes for children and families over the longer term, but lacks the capacity to effectively deliver services, the Commonwealth and NT Governments should engage non-ACCO service providers to partner with them, with funding agreements outlining a clear succession plan over defined timeframes and appropriate resourcing and incentives for building the capacity of the ACCO to deliver services.

Agree

Ref: our submission 3.3 (flexible funding)

We agree that local staff should be empowered to make decisions and develop collaborative relationships with service providers.

We would encourage transparency in all decision-making, and to ensure that collaboration and engagement is appropriate and does not require extra resources or efforts of service providers. Where it does, this should be adequately resourced (see Draft Recommendation 7.1).

We also would encourage the capacity building of government officials to engage in relational approaches to contracting, to ensure mutual understanding of expectations, to ensure consistency.

Agree

See response to 6.1 regarding community representing community interests at Tripartite Forum.

Agree

Ref: our submission 4.1 (partnership), 4.2 (transitions), 4.3 (workforce development), 1.1 (community voice)

8.1 BUILDING THE EVIDENCE BASE THROUGH EVALUATION

The Commonwealth and NT Governments should embed requirements (and appropriate resourcing) for monitoring and evaluation into contracts for children and family services where:

- the service lacks an existing, relevant and context-specific evidence base
- the service is expected to be adapted over time (for example, because the exact inputs and outputs of the program may not be known in advance).

At a minimum, funding should support the use of an evaluative approach that facilitates learning by doing and continuous improvement in services (draft finding 8.2). This should include funding to run periodic surveys that seek to understand user experience and community views on the functioning of the service and how it could be improved. This is an important complement to the collection and reporting of data on outcomes for children and families at the community level (draft recommendation 6.3). Governments should prioritise and fund more formal, rigorous evaluations for programs or services that:

- involve a high level of expenditure and risk, or that cover a large number of children and families
- have been introduced in communities where there have not been significant changes in policies or other programs (to enable reasonable attribution of the impact of the program on outcomes).

9.1 AN AGREEMENT ON COORDINATED FUNDING

The Commonwealth and NT Governments should negotiate an agreement for a coordinated funding framework for services relating to children and families in the Northern Territory. This framework should include:

- the mechanism by which governments will agree on how they will coordinate funding (including any pooling of funds) in line with the needs and priorities of children and families, as outlined in community plans (as per draft recommendation 6.1)
- the institutional arrangements for enacting this coordination, including the role of the Children and Families Tripartite Forum and the NT Children's Commissioner (as per draft recommendations 6.1 and 9.2)
- a commitment to transition to longer-term contracting and a relational approach to engaging with service providers (as per draft recommendations 7.1 and 7.3)
- criteria to guide the selection of service providers and partnerships between Aboriginal and non-Aboriginal providers (as per draft recommendation 7.5)

The coordinated funding framework should be developed in consultation with the Children and Families Tripartite Forum and with community representatives in the Northern Territory.

Agree

Ref: our submission 4.4 (evaluation costs), submission to IES

We would encourage evaluation costs to be included as standard for all contracts, even if an evidence-base exists, to ensure that programs have the capacity to build evidence, properly monitor progress and to provide ongoing insight into the outcomes and impact of programs. Funding could include:

- technical support (i.e. national or or state-level MEAL staff)
- implementation of monitoring/evaluation activities (including data collection, analysis, presentation, training etc)
- training for local staff in evaluation methods (including in evaluating in Aboriginal communities)

We would encourage the government to avoid over-reliance on surveys in communities, but to be open to innovative ways to collect community experiences and view, feedback etc.

Agree

We would encourage transparency in the funding framework and how it is developed. We would encourage any consultation to facilitate formal public consultation mechanisms on the funding framework, and not be limited to the Tripartite Forum and selected community representatives.

9.2 INDEPENDENT OVERSIGHT OF REFORMS

The NT Government should task the NT Children's Commissioner (and its future replacement in the Commission for Children and Young People) with ongoing monitoring and public reporting on the progress of reforms to children and family services in the Northern Territory.

This should include reporting annually on the progress of:

- implementation of the recommendations of the Royal Commission into the Protection and Detention of Children in the Northern Territory
- implementation of the recommendations of this Productivity Commission study.

Where Commonwealth services or funding are involved, the Commonwealth Government should proactively assist the NT Children's Commissioner.

Agree

We would encourage mechanisms for holding government to account to their commitments to improve the situation for families and children across the territory. There should be transparent reporting requirements, with adequate explanations for a lack of progress against commitments or policy changes.

Information Requests

Information		
Requests	Question	Our Response
Information Request 6.1	Which locations or service types should be considered as priority candidates for pooled funding? How could funds pooling be best put into practice in these areas?	We would encourage this to be part of improved mechanisms existing at state level
Information Request 6.2	What are the sensitivities involved in releasing data at the community level on risk, protective and wellbeing factors of children and families (such as statistics on child protection, police, justice, health and education)? How could these sensitivities best be managed?	There is a risk of stigmatising communities as a whole when releasing this data. We would encourage a strength-based framing of data to avoid focusing on deficits or stereotyping of communities, particularly based on racial or other grounds. We would also encourage reviewing data to ensure that it is sufficiently-deidentified, so that it is both useful for programming but also avoids providing specific information or identifiable information regarding individuals or families. We would suggest these sensitivities could be managed in a number of ways: 1. establishing standing MOUs or agreements with service providers related to the use of sensitive data (for example, where service providers need specific local data that this is provided with provisos on using it for programming purposes only). For example, our agreements through the Youth Partnership Project in WA: http://www.youthpartnershipproject.org.au/ . 2. where small communities may mean that data could be identifiable, then service providers could apply for access to the data with caveats around use (with refusal to access only in circumstances where the government has evidence or strong suspicions that it would not be used for the reasons stated). This could mitigate the risk of full access to sensitive data where there is a risk of identification, while also ensuring that service providers have the information that they need to design and provide services which are responsive to community needs and identified issues. We would also encourage community ownership of data, based on best practice models in Aboriginal communities.

Information Request 8.1

How could the reporting burden be reduced for service providers that receive multiple grants from different funding agencies? Should providers only have to report to one funding agency? For example, should a 'lead agency' receive a unified report covering all reporting obligations for the children and family services the provider has been funded for in that jurisdiction? What other options are there to reduce reporting burdens?

We would encourage funders to accept 'pooled' reports, as often different funders require the same or similar information presented in different ways, which can be time consuming for organisations. This could be through a shared portal, or through a 'standardised' report. This would allow organisations to provide all the data related to service provision in one format that can be used by multiple funders through a unified report. We would be interested in exploring the idea of a 'lead agency' model, noting the similarity to Communities for Children reporting, where individual agencies provide reports to the facilitating partner, who then reports directly to funders. If this methodology is accepted, we would encourage transparency in reporting, so that all organisations could see how and where their information is reported.