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Department of Social Services
Engage.dss.gov.au

Review team preparing the successor plan to the
National Framework for Protecting Australia's Children

By email: NationalFrameworkfeedback@dss.gov.au

26 July 2021

Dear Review Team,

To follow is FamilyCare's response to the Consultation Paper - Implementing the successor plan to the National Framework. We have chosen to focus on material disadvantage. We believe governments and in particular the Commonwealth Government, as the custodian of the social security system, can make changes that will reduce the incidence and impacts of disadvantage, in the process improving the safety and wellbeing of children.

Copies of this submission will also be provided to the National Children's Commissioner and the Victorian Commissioners for Children and Young People.

Please contact me if there is any clarification required. We look forward to further information as the process develops and thank you for the opportunity to comment.

Yours sincerely,

David Tennant
Chief Executive Officer

Cc: - National Children's Commissioner, Ms Anne Hollonds
- Victorian Principal Commissioner for Children and Young People, Ms Liana Buchanan
- Victorian Commissioner for Aboriginal Children and Young People, Mr Justin Mohamed

Implementing the successor plan to the National Framework for Protecting Australia's Children 2009-2020

Comments in response to the Consultation Paper – June 2021

Introduction:

Thank you for the opportunity to comment on the Consultation paper.

FamilyCare welcomes the commitment of all Australian governments to developing a successor plan to the National Framework for Protecting Australia's Children. We acknowledge the enormous potential in elevating issues to a national level and creating and maintaining consistent approaches. No issue is more important to our collective future, than the health and wellbeing of our children and young people.

The National Framework for Protecting Australia's Children 2009-2020 (the 'Initial National Framework') was aptly titled 'Protecting Children is Everyone's Business.' That title is just as appropriate in 2021 as it was in 2009 when the Initial National Framework was released.

There are other consistencies that are not as positive. The foreword to the Initial National Framework noted:

Over recent years the reported levels of child neglect and abuse in Australia have increased at an alarming rate. Child abuse and neglect has become an issue of national concern. Meanwhile, statutory child protection systems are struggling under the load.¹

The number of instances involving the neglect and abuse of children has continued to increase. So too have the pressures on child protection systems around Australia. Records of consultations facilitated by Families Australia and published in May 2020, confirm the causes and effects of problems undermining the safety and wellbeing of our children are multiple and complex. Families Australia reported participants as urging that the successor plan be 'transformative'. There was a clear message that 'more of the same' would not be sufficient.²

For that reason, we have decided to focus FamilyCare's comments on just one of the strategic priorities referred to in the Consultation Paper– A national approach to early intervention and targeted support for children and families experiencing vulnerability or disadvantage. Our key message is that the systems providing access to material basics require urgent attention. In particular, we join the broad coalition of voices calling for a recalibration of Australia's social security system to ensure it does not continue to cause or exacerbate disadvantage. Forcing families to live in poverty threatens the safety of children and undermines their wellbeing.

¹ Council of Australian Governments; *Protecting Children is Everyone's Business – National Framework for Protecting Australia's Children 2009 – 2020*; Canberra; April 2009; p.5

² Families Australia; *Beyond 2020: Towards a successor plan for the National Framework for Protecting Australia's Children 2009-2020 – Final Report on National Consultations*; Canberra; May 2020; p.13

About FamilyCare and its interest in the Initial National Framework and successor plan:

FamilyCare is the main provider of child and family services across the Goulburn Valley region of Victoria. FamilyCare's headquarters is in Shepparton, with offices in Cobram, Seymour and Wallan and outreach to Kinglake, Alexandra and Kilmore. The issues being considered by the successor plan are core business for FamilyCare and vitally important for our service users.

A series of tables were included in the Initial National Framework, detailing strategies, actions, responsibilities and measures, to support the intended priority outcomes.

Outcome 2 committed to ensuring:

Children and families access adequate support to promote safety and intervene early.³

The tables supporting outcome 2, made reference to the roll-out of Child FIRST that was occurring across Victoria at the time. Establishing Child and Family Information, Referral and Support Teams (Child FIRST), was an innovative approach to providing support and assistance with concerns about the wellbeing of children and young people. The role of Child FIRST was created and defined in the *Children, Youth and Families Act 2005 (Vic)*, providing a bridge between the statutory child protection system and community supports.

FamilyCare has been the host of Child FIRST across our region in the years since its inception. We have also hosted and chaired the network of service partners known as the Child and Family Services Alliance, throughout that period and acknowledge our Alliance partners, Rumbalara Aboriginal Co-operative, The Bridge Youth Service and The Victorian Department of Families, Fairness and Housing. Both the Child FIRST and Alliance roles provide FamilyCare with an informed perspective about what works and where there are gaps, stressors, or inconsistencies in approaches.

There is an additional reason for our interest in making comment, focused on the impacts of material disadvantage. Shepparton was selected as one of ten place-based welfare reform trial sites around Australia, in May 2011. The experience of the welfare trials and their impacts on our service users, have provided us with a more detailed perspective on the effectiveness of government supports available to vulnerable families and the children in those households.

Access to material basics and child safety and wellbeing

The Initial National Framework acknowledged directly the influence that access to material basics has on child safety and wellbeing. The outline of a national approach for protecting Australia's children referred specifically to the Australian Government's responsibility for providing income support payments.⁴

References to material support proposed for the successor plan are not as direct and in FamilyCare's submission, that opens a potentially significant gap. Sufficiency of access to material basics appears most logically linked to the second strategic priority – 'A national approach to early intervention and targeted support for children and families experiencing vulnerability and disadvantage'. None of the consultation questions explore the structural

³ *ibid*; Council of Australian Governments; *National Framework for Protecting Australia's Children*; pp.18-20

⁴ *ibid*; Council of Australian Governments; *National Framework for Protecting Australia's Children*; p.9

causes of vulnerability and disadvantage, or governments' roles and responsibilities in addressing those structural factors. These issues do appear to have been raised however in preceding consultations.

Families Australia was commissioned by the Australian Government Department of Social Services, to lead national consultations on the successor plan. It did so between March 2019 and March 2020. FamilyCare is a member of Families Australia and has provided feedback relevant to the Initial National Framework and the successor plan directly to Families Australia and to other relevant peak bodies.

The final Families Australia consultation forum was held in Melbourne on the 17th of February, 2020. FamilyCare was unable to attend the forum, although this comment from a participant quoted in the final report, accords with our concerns:

*'Poverty is the elephant in the room and a key driver of child maltreatment. The rate of some income support payments and allowances is working against improving outcomes for children and breaking cycles of disadvantage.'*⁵

The comment is consistent with the outcomes of a survey FamilyCare undertook with the Centre for Excellence in Child and Family Welfare and presented to the Australian Social Policy Conference on 10 September 2019. The 169 respondents, who were predominantly direct service providers working in the Victorian Child and Family Services system, shared similar stories of clients struggling to look after their children, with benefit incomes that were too low and relying on regular emergency relief and material aid. That perpetual cycle of struggle can have lifelong impacts.

For children, living in poverty can increase the likelihood of stressful experiences that affect a child's developing brain architecture, increasing the risk of mental health problems later in life.⁶

These are not new or remarkable observations. For example, ARACY released a report entitled *Measuring Child Deprivation and Opportunity in Australia* in February 2019, which observed:

Children facing more difficult life circumstances are significantly more likely to have deprivations across all areas of their wellbeing...⁷

ARACY hosts The Nest, an evidence-based framework for national child and youth wellbeing, which includes six wellbeing domains. The second of those domains is Material Basics.

The Families Australia consultations on the successor plan were largely complete before the full impacts of the COVID 19 pandemic on the way Australians live, work and interact, unfolded. The unprecedented nature of the threat the pandemic posed, produced some equally unprecedented policy responses. No single response was more unexpected or immediately impactful than the provision of a Coronavirus Supplement of \$550 per fortnight to select categories of Commonwealth support payments, including Parenting Payment (Partnered and Single) and JobSeeker. The relevant payment categories included a large number of households with dependent children, lifting many out of short-term income poverty as soon as the payments commenced.

⁵ *ibid*; Families Australia; *Final Report on National Consultations*; p.142

⁶ Tennant D and Bowey K; *The impact of Social Security reforms on single mothers and their children*; Centre for Excellence in Child and Family Welfare; Melbourne; September 2019; p.8

⁷ Sollis, K; *Measuring Child Deprivation and Opportunity in Australia*; Australian Research Alliance for Children and Youth (ARACY); Canberra; February 2019; p.vi

The Australian National University's Centre for Social Research and Methods was commissioned by the Brotherhood of St Laurence and Social Ventures Australia to investigate the links between financial stress and social security settings. The report released in April 2021, noted that many reliant on the social security system had missed the benefits of Australia's boom years.

We find severe financial stress has declined through recent decades across the whole population. However, those receiving working age social security payments such as the disability support pension, Carer Payment, Parenting Payment and JobSeeker have been left behind. Their financial stress and poverty levels have worsened through Australia's long economic boom of the last 30 years.⁸

Modelling the impacts of the coronavirus supplement provided a compelling analysis; exploring the relationship between the incidence of poverty in Australia and the social security system. The research included the following findings:

- By April 2021 there will be 124,000 more children in poverty than pre-COVID and 163,000 more than at the peak of COVID-19 in June 2020(...)
- Prior to COVID-19, 39 per cent of children in single parent families lived in poverty, with the Coronavirus supplement reducing this rate to 17 per cent.⁹

The authors also projected that removing the Coronavirus Supplement, while increasing the rate of JobSeeker by just \$50 per fortnight would have a dramatic adverse impact on the rates of poverty amongst children in single parent households, increasing from 12 per cent in June 2020 to 46 per cent in April 2021.¹⁰

A qualitative study, by Swinburne University and the Centre for Excellence in Child and Family Welfare and published just prior to the ANU research, explored how the Coronavirus Supplement and related supports altered benefit recipients' experience of the social security system and their personal time use. Respondents reported a range of positive impacts on their physical and mental health.

These dramatic changes enabled people to turn their attention away from day-to-day survival and towards envisioning and working towards a more economically secure future for themselves and their dependents.¹¹

There was a consistent theme throughout the report that children were primary beneficiaries of the increased payments. For example, one respondent reflected:

*'It has made me feel like a good parent being able to actually care for my children and buy them clothes and shoes and send them to outings with their friends when normally they miss out because they know we don't have any money.'*¹²

⁸ Phillips, B and Narayanan, V; *Financial Stress and Social Security Settings in Australia*; ANU Centre for Social Research and Methods; Canberra; April 2021; p.1

⁹ *ibid*; Phillips and Narayanan; *Financial Stress and Social Security Settings in Australia*; p.25

¹⁰ *ibid*; Phillips and Narayanan; *Financial Stress and Social Security Settings in Australia*; p.25

¹¹ Klein, E, Cook, K, Maury, M & Bowey, K; *Social Security and time use during COVID-19*; Swinburne University of Technology & Centre for Excellence in Child and Family Welfare; Melbourne; March 2021; p.6

¹² Klein, Cook, Maury and Bowey; *Social Security and time use during COVID-19*; p.16

We know that poverty and material disadvantage is fundamentally linked to health and wellbeing. We also have contemporary evidence that shows how closely Australia's social security settings are linked to relative levels of poverty and material disadvantage. Evidence collected about the impact of the Coronavirus Supplement suggests two things:

- If there is will to do so, we can dramatically reduce the incidence of poverty in Australia, and
- Turning off additional support can cause financially vulnerable people to return to poverty almost immediately.

The rate of the Coronavirus Supplement may have been too high to maintain in perpetuity. The ANU research modelled various gradations of increase to base benefits, between current settings and the Coronavirus Supplement and their impacts on poverty reduction. The small increase of \$50 per fortnight to the JobSeeker rate has however, had negligible impact. The Commonwealth has also resisted calls to provide extra support to benefit recipients in the latest round of COVID-19 restrictions and lockdowns. These decisions have consequences, consigning many thousands of families and children to a struggle for dignified existence, well below the poverty line.

As well as how much or how little people receive in social security payments, the rules to maintain access to those payments are also important and create unnecessary and avoidable stress. In May 2011, Shepparton, the regional Victorian city in which FamilyCare commenced operations and where our main office is located, was selected as a trial site for a series of welfare reform trials, under the Building Australia's Future Workforce (BAFW) package. In addition to the normal participation rules benefit recipients were required comply with, there were additional compliance obligations applicable to certain classes of benefits in Shepparton and the nine other place-based welfare reform trial sites, around the country.

The BAFW package no longer exists but some elements of the original welfare trials remain. Extra participation obligations and penalties for non-compliance apply particularly to unemployed single parents through the ParentsNext program. As an 'enhanced' ParentsNext site, parents in Shepparton who have been unemployed for more than six months must engage with a ParentsNext provider, develop and stick to a participation plan, once their youngest child reaches six months of age. Failure to engage and comply can result in the suspension or cancellation of a Parenting Payment. Those most likely to be impacted by the rules are single mothers.

Information about the exact numbers of sanctions applied in our community is not available. Correspondence from the Minister for Employment, The Hon Michaelia Cash MP to the Chair of the Parliamentary Joint Committee on Human Rights dated 11 March 2021 revealed there were 52,343 parenting payment suspensions and 1,072 suspensions applied between 2 July 2018 and 28 February 2021.¹³ Although most of the suspensions were quickly removed and payments backdated once a participant 'reconnected', every single instance is likely to have precipitated a financial crisis for the family involved. There is in FamilyCare's view, no safe, fair or appropriate way to withhold a payment intended to support parenting, without increasing risk for the children in the households impacted.

FamilyCare acknowledges that Aboriginal and Torres Strait Islander people are more likely to be impacted by welfare reform measures. The Greater Shepparton Local Government Area has the

¹³ Parliamentary Joint Committee on Human Rights; Ministerial responses; Report 5 of 2021; [2021] AUPJCHR 52.

largest proportion of people who identify as Aboriginal and Torres Strait Islander in regional Victoria, at 3.4 per cent.¹⁴

The proportion of Aboriginal and Torres Strait Islanders was not referred to as a reason for Shepparton's selection as a welfare reform trial site. Many in the local community have however presumed that to be the case. For example, an independent study of the experience of the welfare conditionality measure income-management, in Shepparton and the South Australian community of Playford noted:

There was are perception in Shepparton that the area was chosen as a trial site for the Basics Card based on its high Indigenous population.¹⁵

With almost a decade since the welfare reforms commenced in Shepparton, the indicators if disadvantage referred to as rationale for undertaking the trials, for example the incidence and duration of unemployment, have not improved. Other indicators of wellbeing amongst children in Shepparton, in particular the Australian Early Development Census data, have deteriorated. There has been no meaningful investigation of potential links between higher levels of welfare conditionality, increases in material disadvantage and the consequences for children and young people.

Conclusions and recommendations:

There is a compelling and growing body of evidence that confirms the links between material disadvantage and the safety and wellbeing of children. It is also clear that the actions of governments and especially the design and operation of the social security system, are directly related to the prevalence and experience of material disadvantage.

Our recommendations are:

1. The successor plan should recognise and measure the incidence and impacts of material disadvantage on the safety and wellbeing of children.
2. The Commonwealth should immediately apply an increase to the base rate of working age benefits, of no less than \$100 per week.
3. The Commonwealth should immediately cease the application of conditionality sanctions that reduce, suspend, or cancel benefit payments to people with dependent children in their care.
4. The Commonwealth and State and Territory governments should liaise to establish an appropriate, expert and independent process for the regular review of benefit incomes.

¹⁴ Shepparton population data is available through the Greater Shepparton City Council website here <https://profile.id.com.au/shepparton/population?BMID=230>

¹⁵ Mendes, P; Roche, S; Marston, G; Peterie, M; Staines, Z and Humpage, L; *The Social Harms Outweigh the Benefits. A Study of Compulsory Income Management in Greater Shepparton and Payford*; Australian Social Work; October 2020; p.11