



NADA
network of alcohol and
other drugs agencies



WOMEN'S AOD
SERVICES NETWORK

Submission to NSW Family and Community Services on proposals to improve the NSW child protection system

November 2017

The Network of Alcohol and other Drugs Agencies (NADA) is the peak organisation for the non-government alcohol and other drugs sector in NSW.

NADA's goal is to lead as a member driven peak body, building sustainable non-government alcohol and other drug organisations to reduce alcohol and drug related harms to individuals, families and communities in NSW.

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About NADA

The Network of Alcohol and other Drugs Agencies (NADA) is the peak organisation for the non-government alcohol and other drugs sector in NSW. Our vision is a connected and sustainable sector providing quality evidence based programs to reduce alcohol and drug related harms to NSW communities.

NADA's goal is to lead as a member driven peak body, building sustainable non-government alcohol and other drug organisations to reduce alcohol and drug related harms to individuals, families and communities in NSW.

We represent approximately 100 organisational members that provide a broad range of services including health promotion and harm reduction, early intervention, treatment and after-care programs. Our members comprise of services that are diverse in their structure, philosophy and approach to alcohol and other drugs service delivery. NADA provides a range of programs and services that focus on sector and workforce development, information management, governance and management support, sector representation and advocacy, as well as actively contributing to public health policy.

NADA is governed by a Board of Directors elected from the NADA membership. We are accredited under the Australian Service Excellence Standards.

Further information about NADA and our programs and services is available on the NADA website at www.nada.org.au.

PREPARATION OF THIS SUBMISSION

NADA welcomes the opportunity to provide input into the discussion paper regarding proposed amendments to the Children and Young Persons (Care and Protection) Act 1998 and the Adoption Act 2000, to help shape a better child protection system.

The comments provided in this submission have been prepared by NADA staff, in consultation with the Women's Alcohol and other Drug Services Network and endorsed by the NADA Board of Directors.

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Specific Comments

NADA is pleased to submit feedback on the NSW Family and Community Services Shaping a Better Child Protection System Discussion Paper. The feedback is provided given the impact the proposed changes will have on services provided by the NSW non-government (NGO) alcohol and other drug sector. **NADA restricts its comments to Section 2, Earlier family preservation and restoration.**

- **Limited consultation and collaboration with the specialists NGO alcohol and other drug services sector**

“The Government announced in March 2017 that a range of NGOs would deliver internationally proven intensive family preservation and restoration programs, Multi Systemic Therapy for Child Abuse and Neglect and Functional Family Therapy-Child Welfare, to work with families where there has been physical abuse or neglect. These services commenced in August 2017” (Section 2 p.11).

\$90.5 million dollars has been invested in Multisystemic Therapy for Child Abuse and Neglect (MST-CAN) and Functional Family Therapy-Child Welfare (FFT-CW) programs, designed to ‘respond to trauma, substance misuse and other underlying causes of child abuse and neglect’. Multisystemic Therapy for Child Abuse and Neglect (MST-CAN®) was developed primarily to ‘address family mental health and drug and alcohol recovery needs¹ and is delivered ‘relatively independent from the broader substance misuse service system,²’ offering a range of specific clinical treatments. Given our NGO alcohol and other drug (AOD) services are currently providing evidence based treatment for parents and families involved with FaCS, for example nearly 100% of clients engaged with our women’s NGO AOD services³ have FACS involvement; NADA and the Women’s AOD Services Network are keen to participate in future consultations about how FFT-CW and MST-CAN will fit with existing NSW AOD services.

NADA’s Women’s AOD Services Network and its members include both specialist AOD NGO services and broader community support programs for women with and without children in their care. The Women’s AOD Services Network would like the opportunity to meet with FACS to discuss their programs and how FACS could effectively access the capabilities of women’s AOD services to support vulnerable children and families.

NADA acknowledges the findings of David Tune’s review, that parental drug and alcohol abuse is one of the primary drivers of children entering out of home care and that agencies currently work in silos and there is a need for greater collaboration⁴. However, to our knowledge there has been no consultation with the NGO AOD sector about the reforms to date. NADA and its members are eager to be a part of future discussions and

¹[Their Futures Matter Family Preservation and Restoration programs](#)

² Schaeffer, C, Swenson, C, Penman, J & Tuten, M 2014, ‘[Implementing Reinforcement-Based Treatment \(RBT\) for Substance Use Disorders within child protective systems in Europe](#)’, *International Journal of Prevention and Treatment of Substance Use Disorders*, vol 1, no. 2, pp. 38–52.

³ NADA Women’s AOD Services Network - http://www.nada.org.au/media/93696/waodsn_profile_v2.pdf

⁴ [Their Futures Matter: A New Approach Reform directions from the Independent Review of Out of Home Care in New South Wales](#)

key stakeholder meetings to provide our input and expertise about the reforms and to collaborate with other agencies so we can work together to enable positive outcomes for our most vulnerable clients.

- **The capacity of NGO alcohol and other drug services to respond to priority requests for treatment and services to a child, young person or family**

'The original intention of the best endeavours provision is for agencies to exercise a genuine and considered effort to respond to requests for services to promote the safety, welfare and well-being of the child or young person. The Their Futures Matter reform recognises that the traditional approach to service provision for vulnerable children and families has not been adequate in responding to the needs of children and families with complex needs. The reform is based on a whole of government approach to service provision and has introduced structured governance and accountability across the service system. This includes the establishment of a dedicated commissioning entity, which will have a single view of services and supports for vulnerable children and families across portfolios, government departments and the sector. To support this vision for whole of government service provision for vulnerable children and families, it is proposed that the obligations on government departments, agencies and funded NGOs to provide services to children and families also be strengthened in legislation. Changes may include broadening best endeavours to cover the provision of a wider range of services, such as FACS or the Children's Court may request a drug and alcohol rehabilitation service provider to prioritise access to a parent, to enable the parent to address their drug or alcohol addiction to facilitate a sustainable restoration' (Section 2.4 p.17-18).

NADA and its members recognise the importance of timely access to services and treatment, particularly when responding to children and families with complex needs. The NGO AOD sector works extensively and tirelessly to support people experiencing AOD issues, and prioritises services and treatment to the most vulnerable clients. As stated earlier the NGO AOD sector are keen to meet with FACS to discuss the proposed legislative amendments. We believe we can provide valuable input about existing NSW NGO AOD services, referral pathways and coordinated care models that would ensure timely service provision for vulnerable clients. The NGO AOD sector is highly motivated to work collaboratively with FACS and other agencies to help shape a better child protection system.

- **Greater clarity around the changes to the mandatory reporting procedures**

'Consideration is being given to allowing an exception to the existing mandatory reporting requirements for those mandatory reporters who are working intensively with families following a referral from FACS. Where those mandatory reporters have assessed that the supports they are providing are sufficient to mitigate the child protection risks in a family, rather than reporting the risk to the Helpline in the traditional way, these mandatory reporters could satisfy their reporting obligations by sending a streamlined electronic report to the Helpline noting the child protection risks and what is being done to mitigate those risks. Mandatory reporters will also not

be required to re-report matters in circumstances where the risks are well known to FACS and the services being provided are directed at reducing the child protection risks within a family. Additional guidance and training would be provided to mandatory reporters about when it would be appropriate to submit a streamlined electronic report and when it is necessary to make a report to the Helpline in the usual way' (Section 2.6 p.20).

NADA recognises the significant resources used to review matters re-reported to the Helpline and agree that FaCS needs to focus these resources on responding to families who are not receiving supports. We are concerned however upon the lack of clarity that such changes may have on service providers. Most staff in the NGO AOD are mandatory reporters. Therefore, we believe we can provide valuable input into the design of new reporting procedures.

Closing Comments

NADA and the Women's AOD Services Network appreciate the opportunity to feedback on this discussion paper. We welcome the opportunity to attend any future workshops or consultation mechanisms for key stakeholders, to mobilise the NSW NGO AOD sector and support broader sector consultation and collaboration with all services impacted by any reforms. We believe our participation in future discussions will help create a more unified service sector and in turn enable better outcomes for our most vulnerable clients.