



Guardian
for Children and
Young People



**Training
Centre**
Visitor

Submission

Draft Workforce Strategy for the Child Protection and Family Support Sector

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Acknowledgement of Country

I respectfully acknowledge and celebrate the Traditional Owners of the lands throughout South Australia and pay my respect to their Elders, children and young people of past, present and future generations.

Preliminary Notes

I make this submission in my capacities as Guardian for Children and Young People, Training Centre Visitor (TCV), Child and Young Person's Visitor (CYPV) and Youth Treatment Order Visitor (YTOV). In these positions, my role is to advocate for the rights and best interests of children and young people in care and youth detention.¹

I fulfil these functions through providing advocacy on individual and systemic matters, as well as monitoring the safety and wellbeing of individual children and young people.

Introduction

First and foremost, I want to acknowledge each and every person working in the child protection and family support sector. Your work to support the safety and wellbeing of children and young people has immense value. The passion, drive and commitment I witness day in, day out, is inspiring. Workers who keep turning up, despite inadequate resourcing, emotional strain, and lack of recognition.

In presenting my views on the *Draft Workforce Strategy for the Child Protection and Family Support Sector* ('the strategy') I do not seek to detract from the important work that you do. It is critical that the sector be aligned and empowered to support the best interests of children and young people. My view is that the strategy should be a mechanism to support this goal. In that spirit, I have prepared feedback across the following points:

- Next steps for engagement and consultation
- Framing of the strategy
- Promoting a focus on children and young people
- Further highlighting the valuable role of Aboriginal cultural expertise in the workforce
- Fulsome consideration to foreseeable workforce impacts associated with sector reform
- Governance, reporting and accountability.

¹ Information about each of my roles and statutory functions is available on the Office of the Guardian for Children and Young People's website at <https://gcyp.sa.gov.au/what-we-do/>.

Engagement and consultation

The consultation process

As a preliminary matter, I wish to note that that my office became aware that the draft strategy had been released for consultation through monitoring online public consultation resources, without prior discussion or notice from the state government.

As the strategy lists 'oversight...bodies...advocating for the communities we serve' as a key sector partnership,² it does seem unusual that my office has not been engaged or consulted in a targeted way. I am unable to comment with any authority on the extent to which promotion and consultation has been conducted on this important strategy. But I would encourage the department and decision-makers to reflect on their commitments to partnerships, and being brave and courageous in seeking input to improve the quality of care they provide to children in this sector.

In light of these matters, I am interested to know more about the consultation process for this strategy. This includes how – and the extent to which – the views of children and young people have been considered.

I would welcome the opportunity to meet with the Department for Child Protection and discuss the implications for children and young people in care in more depth. It is vital that the strategy is informed by the voices of children and young people, and that the impacts of the strategy on children and young people are adequately considered both in the final strategy and its implementation.

Missed opportunities – insights from children and young people

 ***I have only heard things second-hand nobody has talked to me.*** 

Young person in care

In my role, I am constantly in awe of, and inspired by, children and young people's frank, fearless and incredibly insightful commentary on the child protection and family support system. We must never discount the ability of children and young people to make a meaningful contribution to every aspect of our work.

I have no doubt that children and young people, and indeed families, have very valuable insights about how the workforce can be best supported. For example, insights in relation to why workers choose to leave the sector, and the key reasons why they stay.

All too often I see strategies that impact children and young people, which have not included consultation with them. I would be keen to understand how children and young people's views have been incorporated into this strategy.

² Government of South Australia, Department for Child Protection (DCP), *Draft Workforce Strategy for the Child Protection and Family Support Sector* (2024), p. 8 ('the Draft Strategy').

No one is listening to what I have to say.

Young person in care

I note that there are multiple consultation pathways available including through the Commissioner for Children and Young People, the Commissioner for Aboriginal Children and Young People, CREATE, and agency level pathways such as No Capes for Change and local youth advisory groups. It is my firm belief that consultation with children and young people is important in all strategies that affect them. Relationships with workers and carers is one of the most consistent themes that children and young people raise with my office, and I believe they will have a lot to say on this kind of strategy.

The origins of the strategy

The YourSay engagement for this strategy stated that development commenced with a Workforce Summit. As such, it is unclear whether the strategy also seeks to deliver on recommendation 30 from the 2016 Child Protection Systems Royal Commission:

Require the Agency to take a lead role with other stakeholders to develop and implement a workforce strategy designed to improve staffing practices and performance across the broader child protection system.³

I note that this recommendation has been accepted and its progress is listed as ‘implementing’ in the most recent reporting.⁴

If the strategy seeks to deliver on this recommendation, this should be clearly articulated so that the draft can be reviewed to ensure alignment with the intent of this recommendation.

It should also be clear how the strategy interacts with any other relevant frameworks – such as the *National Framework for Protecting Australia’s Children (Safe and Supported)* and associated action plans, and other agency level strategies and action plans.

Framing of the strategy

Avoiding stigmatisation

It is imperative that the way the strategy is framed does not problematise children and young people. It is no secret that working in the child protection and family support sector can be challenging for individuals on a social, emotional and psychological level. However, when acknowledging this, the language we use plays an important role in ensuring that children and young people themselves are not framed or seen as ‘the problem’. A strong focus on articulating and referencing the challenges can contribute to stigmatisation of the people and the work – particularly in the absence of naming the rewarding (and often fun) aspects of working with

³ Hon Margaret Nyland, *The Life they Deserve: Child Protection Systems Royal Commission* (2016).

⁴ Government of South Australia, *Safe and well: Supporting families, protection children: 2023 annual report*, Appendix 1: 2023 Recommendation Update.

children and young people and their families. It is a privilege to be a part of children and families lives in this way, and the workforce must be supported to view their work in this way.

As an example, there is a whole page each dedicated to the 'case for change' and 'competing pressures' – both of which are focused on *challenges*. In comparison, there is only half a page on 'sector strengths', which still includes negative-focused phrases such as '[d]espite the challenging nature of the work many staff flourish'.

As a further example, I highlight the statement that the child protection and family support sector staff who 'approach their work every day with compassion, empathy and commitment ... are the major strength of our system'. I challenge this notion, and offer instead that the *partnership* between the workforce and the children, young people and families they serve is the major strength of our system.

Indeed, in my experience, the highly meaningful and valuable work to engage with children, young people and families is exactly what draws people to this sector. Similarly, the relationships formed with children and young people, watching them grow, and supporting them to thrive is one of the factors that inspires workers to remain in the sector.

With this in mind, I consider that the strategy would benefit from further review with a lens to ensure that children and young people are not problematised – and, in fact, are celebrated.

Scope

The strategy would also benefit from further clarity about who it intends to capture. The child protection and family support sector can be difficult to navigate and, as mentioned in the strategy, there are multiple players – including government, non-government, advocacy and oversight bodies, peaks and professional bodies, education and training providers, staff and unions. It would be beneficial to provide a pictorial representation of who these key players are, and the services they provide.

We know that a whole of government approach is required to support children, young people and families, and to change current trajectories for vulnerable children, young people and families. Indeed, I note that a key finding of the review into the *Children and Young People (Safety) Act 2017* was that a 'significant majority' of stakeholders have a 'strong preference' for the adoption of a public health approach to child protection and family support.⁵

In its current state, it is not clear that the strategy anticipates this level of reform, and that all affected agencies have been thoroughly engaged. As an example, my office could find no reference in the strategy to the Department for Education. As the agency engaged with children throughout their schooling years, the education workforce must be framed as an integral part of the child protection and family support sector. They are a partner in this work, not a recipient.

Ensuring all agencies that work to support children, young people and families are party to the strategy is particularly important in light of other potential workforce impacts associated with anticipated sector reforms, discussed later in this submission.

⁵ Government of South Australia, DCP, *Review of the Children and Young People (Safety) Act 2017 Report*, p. 17 ('CYP Safety Act Review Report').

Promoting a focus on children and young people

The strategy must do more to promote a focus on improving outcomes for children and young people. This is not to take away any emphasis from the important purpose of the strategy – namely, to support the child protection and family support sector workforce. Rather, it is an acknowledgement that the very purpose of having this workforce is achieving positive outcomes for children and young people and their families. Keeping this important fact in mind helps ensure that workforce strategies centre around this goal.

The case for change

The strategy sets out the case for change, stating the key reasons to include:

- Growing demand, increasing complexity
- High competition for a qualified workforce
- Ongoing need for the right type of skills
- High turnover, insecure employment
- Future workforce changes.⁶

While these reasons are undoubtedly true, I believe that one of the most compelling reasons for change has been overlooked – the delivery of high-quality services for children and young people. Where there is a clear and purposeful strategy in place to ‘gain, train and retain’ workers within the sector, this will support improved outcomes for children and young people.

Being clear about the intended outcomes for children and young people

Another way to increase the visibility of children and young people within the strategy is to be clear and intentional about the outcomes intended for them. I note that under each of the priority areas – gain, train and retain – the impacts on the sector, staff and Aboriginal communities have been considered (pages 18, 22 and 26). I strongly recommend that, on each of these pages, a similar statement could be included about the impacts for children and young people.

By way of example, a positive impact for children and young people under the ‘retain’ heading could include an increased ability to develop long-term, stable relationships with social workers, decision makers, carers and other workers.

Improved outcomes as the solution, rather than the challenge

In the child protection and family support sector, we all envisage we are working together to improve outcomes for children and young people. However, often we see this as one of our biggest ‘challenges’, rather than one of our biggest ‘opportunities’.

⁶ Government of South Australia, DCP, *the Draft Strategy* (n 2), p. 5.

In the context of retention, I recognise burnout syndrome as a distinct ‘occupational phenomenon’ that comprises emotional exhaustion, physical fatigue, and cognitive weariness. I recognise its existence within the child protection and family support services workforce; too often, we hear commentary from the workforce about:

- operating at or over capacity – with potential consequences such as being unable to respond in a timely manner to notifications about suspected child abuse or neglect, having to leave children and young people in placements with minimal or limited risk mitigation strategies, not being able to devote enough time and energy into case planning and reviews, or to ensuring cultural and family connections are maintained and supported.
- not feeling supported to think creatively or pragmatically about unique situations that confront the workforce, especially when trying to achieve the best interests of a child or young person.
- feeling like they are undertaking transactional-based interactions with children, rather than relational interactions that contributes to children’s overall best interests.
- carrying high levels of risk, fearing reprisal when things go wrong, and not receiving recognition for good practice.
- a perception (real or otherwise) that they are not adequately compensated for the work they undertake.

As told to my office, these factors contribute to this ‘burnout’ and facilitate staff consideration to leave the sector. It is important to note that, in discussions with my office, staff often reflect on their sadness and personal disappointment of not meeting their own expectations for supporting children and young people in care. What is overwhelming clear is:

1. the desire of the workforce to be there for children and young people and reduce (or even eliminate) adverse outcomes.
2. the hope that they will actively be empowered to act in the best interests of children and young people.

Investment is sorely needed

While the development of the strategy will go some way to supporting the sector, it is equally important to turn attention towards strategies for improving the department’s capacity to respond astutely to resourcing and economical challenges.

In my 2023 report on child protection expenditure,⁷ I highlighted that the under-resourcing of the child protection and family support sector is a human rights issue for children in South Australia. In fact, all Australian governments have been called on by the United Nations Committee on the Rights of the Child to:

⁷ Office of the Guardian for Children and Young People (OGCYP), *Child Protection in South Australia, from the Productivity Commission’s Report on Government Services 2023* (2023).

- invest in family preservation services and strategies, particularly those developed and implemented by Aboriginal children, families and communities
- limit removal to when it is genuinely necessary and for the shortest time possible
- ensure adequate human, technical and financial resources in relevant sectors.⁸

My concerns about the low proportion of child protection services expenditure directed towards family support and intensive family support in South Australia have been well documented. Solid investment in these services helps to keep families together, and to reunite them. It upholds children and young people's rights to live with their family, where it is safe to do so.

At the same time, it is important to ensure continuing investment in the lives of children and young people in care. In my abovementioned report, I also raised concerns that care services expenditure is not keeping pace with growth in the number of children in care in recent years – particularly in light of the rate of placing children into residential care. Simply put, that means we are spending less money on the day-to-day needs of an individual child in care, including sourcing placements and assessing carers, case management for children and young people, payments for carers and the costs of operating residential care facilities.

When we fail to adequately invest in the lives of children and young people in care, the adverse outcomes for them as individuals has flow on effects across the entire sector. If we don't address these matters, even the most comprehensive workforce strategy will struggle to make a dent in challenges around recruitment and retention.

Aboriginal Culture is Key

The overrepresentation of Aboriginal children and young people across the entirety of the child protection sector is well researched and documented. What is not done well is addressing and combatting the factors that contribute to this. As an oversight body that makes continued commentary on this matter, it worries me greatly that these statements and statistics do not seem to resonate or impact the sector in any urgent or pressing way.

We are at the point now that the proportion of Aboriginal children and young people in care is approximately 40%.

Not only does this indicate that current efforts in line with Closing the Gap are not good enough, and that the current ways of working are failing Aboriginal children and young people. It also demonstrates a level of ambivalence or mere acceptance that this will be the status quo and something our society is comfortable in accepting.



Acknowledge our cultures.



Aboriginal young person in care

⁸ UNCRC, *Concluding observations on the combined fifth and sixth periodic reports of Australia*, 1 November 2019, CRC/C/AUS/CO/5-6, [33].

A dedicated focus on building and supporting the Aboriginal workforce

We know that improved outcomes for Aboriginal children and young people can only be achieved by listening to the voices of, and working alongside, Aboriginal people (including Aboriginal children and young people). That is why we are ardent supporters of a focussed and intentional approach to developing and scaffolding an Aboriginal workforce that is recognised and valued to the same extent as any other professional workforces in this sector.

We know that Aboriginal children and young people have their needs better identified and met when Aboriginal people and organisations are contributors and key agents of this work. This makes it imperative to:

- increase the number of Aboriginal people working in the sector
- support Aboriginal people with training and career progression opportunities
- recognise the unique skills and expertise of Aboriginal people working in the sector
- build a workforce culture that values and respects Aboriginal cultures and knowledge's
- challenge and eliminate any cultural bias or racism that directly or indirectly devalues Aboriginal culture and knowledges
- mandate ongoing training for non-Aboriginal workers to build cultural awareness and capability.



We are told we have rights ... but when it involved culture ... my choice was not listened to.



Aboriginal young person in care

I recognise that the points above are incorporated into the strategy with key actions under each of the priority areas, and I welcome this. I also welcome the statement in the draft strategy that:

Growing the Aboriginal child protection and family support workforce will also help build the capability of the non-Aboriginal workforce, leading to better outcomes for Aboriginal families.⁹

In reviewing this draft strategy, I must raise an omission that relates to a long-standing oversight from the department's perspective. From my observations, I am comfortable in asserting that Aboriginal staff are called upon to go above and beyond the call of duty and their job specifications. This includes, but is not limited to, the provision of cultural advice outside the scope of, or on top of, their specific role; or in supporting non-Aboriginal workers to build cultural awareness and capability. They are often not recognised for this, nor is there professional recognition that Aboriginal staff are often approached after work for support, advice or even reprisal from families within their own local towns and communities.

Recognition must be granted for this professional and personal load, and it is important to ensure the responsibility for building cultural awareness and capability is not placed solely on the shoulders of Aboriginal people.

⁹ Government of South Australia, DCP, the *Draft Strategy* (n 2), p. 18.

In reviewing Department for Child Protection's Reconciliation Action Plan, I am aware that there is a dedicated focus on development of an Aboriginal Workforce Strategy. I would be interested to understand whether this eventuates, how it would intersect with this strategy and its connectivity to the Aboriginal and Torres Strait Islander First Action Plan under *Safe and Supported*. Specifically, it is important that any relevant workforce strategy aligns with Action 4 of that plan, which will see the development of a national approach to building a sustainable Aboriginal workforce.

The steps toward Aboriginal self-determination and delegated authority

In considering the fullness of an Aboriginal workforce strategy across the sector, it is essential that we consider the current momentum that is building towards delegating legislative authority for certain child protection functions to Aboriginal people, entities and organisations.

As we know, Aboriginal children and young people, as well as their families and communities, experience unique and culturally specific traumas when engaging with the child protection system. This occurs against a background of the history of racism, racially discriminatory child removal practices across Australia (including the Stolen Generations) and other associated policies that segregated Aboriginal people from full participation in the workforce and society. This history means that Aboriginal children and young people and their families can find engaging with government services to be so distressing that it is retraumatising. Receiving services through Aboriginal organisations and culturally trusted entities with Aboriginal workers can help people feel safe to talk about what is happening within their family and receive tailored supports that caters meeting any cultural needs. It also helps remove trauma triggers for individuals, families and communities.

This is why my office's submission to the review of the *Children and Young People (Safety) Act 2017* (the *CYP Safety Act*) called for legislative reform to allow for the progressive delegation of functions to Aboriginal organisations. Significantly, this was also a preliminary recommendation of the Commissioner for Aboriginal Children and Young People's interim inquiry report.¹⁰

In fact, as recognised by the Department for Child Protection's report on the review:

*The majority of stakeholders and people attending community consultations agreed that the legislation should explicitly provide for the progressive delegation of legislative functions to recognised Aboriginal entities...*¹¹

I am pleased to see the government's commitment towards ensuring this legislative change occurs, including through South Australia's 2021 Implementation Plan for the National Agreement on Closing the Gap.¹²

This important legislative reform is deeply tied to workforce planning, and must occur parallel to an ongoing commitment to build and improve partnership approaches within all organisations that exercise child protection functions for Aboriginal children. This includes

¹⁰ Commissioner for Aboriginal Children and Young People (CACYP), *Preliminary Report: The Inquiry into the Application of the Aboriginal and Torres Strait Islander Child Placement Principle in the Removal and Placement of Aboriginal Children in South Australia* (2023), preliminary recommendation 5, p. 19.

¹¹ Government of South Australia, DCP, *CYP Safety Act Review Report* (n 5), p. 13.

¹² See page 59, under Outcome 12: Aboriginal and Torres Strait Islander children are not overrepresented in the child protection system.

through ensuring Aboriginal voices are incorporated and prioritised in decision-making about Aboriginal children and young people.

A theme that has arisen in my office's engagement with Aboriginal children and young people in care is the importance placed on having the opportunity to engage with, and receive support from, Aboriginal workers, with young people expressing what is important to them:

 **"Access to Aboriginal workers or visitors"** 

Aboriginal young person in care

 **"There should be Aboriginal groups at school for the children"** 

Aboriginal young person in care

 **"Aboriginal workers working with young Aboriginal kids"** 

Aboriginal young person in care

 **"Aboriginal mentors"** 

Aboriginal young person in care

Providing Aboriginal children and young people with the opportunities to receive this support requires improved efforts to recruit Aboriginal staff to work in mainstream child protection services, and deliver the culturally safe workplaces required to retain staff.

Acknowledgement of Country

It came as a surprise that the draft strategy does not include an Acknowledgement of Country. I would like to take the time to remind the authors of the reasons behind including an Acknowledgement of Country in official documents, as stated by Reconciliation Australia:

Aboriginal and Torres Strait Islander peoples have experienced a long history of exclusion from Australian history books, the Australian flag, the Australian anthem and for many years, Australian democracy.

This history of dispossession and colonisation lies at the heart of the disparity between Aboriginal and Torres Strait Islander and other Australians today.

Including recognition of Aboriginal and Torres Strait Islander peoples in events, meetings and national symbols contributes to ending the exclusion that has been so damaging.

Incorporating welcoming and acknowledgement protocols into official meetings and events recognises Aboriginal and Torres Strait Islander peoples as the Traditional Owners of land and shows respect.¹³

I also want to draw attention to deliverable 6.1 of the Department for Child Protection's active Reconciliation Plan:

Increase staffs understanding of the purpose and significance behind cultural protocols, including Acknowledgement of Country...¹⁴

Honouring cultural protocols such as Acknowledgement of Country is particularly important in the context of child protection, due to the injustices faced by Aboriginal people, including the forced removal of Aboriginal children and young and young people from family, community, and the significantly disproportionate rate of contact with the child protection system. I look forward to seeing this rectified in the final document, or to hearing the Department for Child Protection's reasons for the omission.

A note on terminology

Similar to the importance of following cultural protocols, terminology used in the strategy should also be considered in light of historical context. For example, terms such as 'child welfare' may have negative associations for some readers. Alternative terms such as 'child safety and wellbeing' could be considered as replacements.

I also note that where the term 'Aboriginal and Torres Strait Islander' is used, Islander should be capitalised.¹⁵

Anticipating the workforce impacts of reform

As evident in a number of my points above, I believe it is essential to contextualise the workforce strategy within the broader scope of anticipated reforms to South Australia's child protection and family services sector. I have already highlighted matters such as:

- the Department for Child Protection's review of the *CYP Safety Act*, which recommended a shift towards a public health model in delivering child protection and family support services
- the Commissioner for Aboriginal Children and Young People's recommendation that the *CYP Safety Act* should be amended to enable delegated authority to recognised Aboriginal and Torres Strait Islander organisations
- the significant reform required under the *Safe and Supported* First Action Plans.

¹³ Reconciliation Australia, *Acknowledgement of Country and Welcome to Country*, available at: <<https://www.reconciliation.org.au/reconciliation/acknowledgement-of-country-and-welcome-to-country/>> (accessed April 2024).

¹⁴ Government of South Australia, DCP, *Reconciliation Action Plan* (2022).

¹⁵ Government of South Australia, DCP, *the Draft Strategy* (n 2), p. 7.

I would also like to note other areas of potential reform under consideration, which are likely to carry workforce impacts for the child protection and family support sector. This includes:

- the proposal to raise the Minimum Age of Criminal Responsibility, which will transfer service delivery for some children and young people away from the youth justice system and the potential reliance on the child protection system (and workforce) to support diversion initiatives.
- implementing recommendations from the South Australian Royal Commission into Early Childhood Education and Care, which require additional human resources to expand scope and delivery of ECEC services – including responding to a predicted increase in child protection notifications (and interventions) due to children having increased contact with professionals who are mandated notifiers
- the final report and recommendations of the federal Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, which fundamentally challenges how we approach support and inclusion for children with disabilities
- observations and recommendations from the Kate Alexander review, *Trust in Culture*, which had a strong focus on the child protection workforce and how the Department for Child Protection and Department of Human Services co-exist in this sector
- the upcoming Royal Commission into Domestic, Family and Sexual Violence, which should be anticipated to critically review how the child protection and family support sector can better prevent violence and abuse, and deliver services to victims and survivors.

There is no mention of either the challenges or opportunities posed by any of these areas of significant reform. Including any increase in workload pressures, variation in skills and talents required as a result of these reforms and capacity for the child protection sector to cope with such significant multi-dimensional expectations these reforms will require. In the absence of anticipation and planning, I am concerned that the strategy might find itself quickly outdated and overwhelmed

There is a final area of reform I would like to highlight, with the most direct link to workforce impacts – namely, the Social Workers Registration Scheme. While there is passing mention of the new scheme in the strategy, it is unclear how it anticipates the extensive changes and risks for attraction and retention. I discuss this in more detail below.

Social Workers Registration Scheme

South Australia is the only Australian jurisdiction to have passed legislation introducing a registration scheme for social workers. The intended benefits of this scheme include improved public safety, higher standards of conduct and accountability through the provision of accessible mechanisms for complaints and review and improved professional development opportunity for people within the profession.¹⁶ If those benefits can be achieved, then there is significant alignment between the goals of the draft workforce strategy and the introduction of

¹⁶ Government of South Australia, 'Social Workers Registration Scheme South Australia', available at: <<https://www.swrs.sa.gov.au/>> (accessed April 2024).

the scheme. Both should be aimed at better services for children and young people, through harnessing and developing the talent and skill that sits within the child protection and family services sector. But, in acknowledging this potential, it is important to also consider and address the risks associated with workforce impact.

Currently, the scheme is set to commence from 1 July 2025, with a six-month grace period for the existing workforce to undertake relevant steps for their registration. We can anticipate that next year is going to be a big one for the child protection and family support sector workforce, and there may be some challenges associated with transition. Beyond 2025, it will take some time to identify, evaluate and respond to both risk and potential.

One of the most significant factors in anticipating the workforce impacts of the scheme is the Social Workers Registration Board's determinations regarding the 'scopes of practice' for the social work profession, and what qualifications will be required for individuals working in those various scopes. The outcome of that process will necessarily determine the extent to which the draft strategy needs to account for upskilling of staff who fall within the scope of the scheme, but who do not currently have the necessary qualifications.

If registration requirements do result in significant changes for qualification requirements for existing and new employees, it will be important to consider the impacts on attraction and retention in both the short and long-term – and how that will impact service delivery for children, young people and families. This is particularly relevant in the current environment where residential care sector is growing at an exponential rate and even current recruitment and retention is difficult. Acknowledging that most staff are youth workers, current discussions relating to scope of practice would require such staff working with children and young people in this setting to meet a multitude of criteria that would most likely require upskilling.

While this is a challenge for the sector and the workforce, we have to remember that it is children, young people and their families who will be most affected.



I guess it just hurts...they don't mean to do these big swaps, but it hurt



Young person in care

Just last year, the Department's boundary realignment provided an example of the consequences for the lives of children and young people, when there is insufficient planning for major workforce transitions. In my 2022-23 Annual Report as Guardian for Children and Young People, I made commentary on the types of issues caused through disruption to children and young people's relationships and access to support from workers. This included:

- realignment compounded cumulative instability arising from frequent case worker changes
- grief and distress were created by the loss of longstanding and trusted case worker relationships

- some children and young people did not know who their new case worker was and/or did not have an allocated worker during the transition
- transition from care planning was disrupted
- problems arose due to inadequate case handovers, delays with case management functions (such as contact arrangements) and, in some instances, unexpected changes in case direction
- practical problems arose due to staff vacancies or staff inexperience arising from role changes.¹⁷



In our area, every kid is losing their social worker. The weekend we were told...every kid went missing that weekend. Every kid was running away from the situation.



Young person in care

It will also be important to consider the consequences of the scheme for the South Australian government's ability to meet its commitments under its implementation plan for the National Closing the Gap Agreement, and the Safe and Supported framework. This includes across matters such as increasing Aboriginal employment in the sector and progressing towards delegated child protection authority to Aboriginal organisations. Indeed, these were considerations that formed part of my evidence in 2019 to the Parliamentary Joint Committee on the Social Workers Registration Bill, in my capacity as the then head of Reconciliation South Australia.

My evidence emphasised the need for the sector to be able to support Aboriginal children, young people and families in a culturally appropriate way. A fundamental part of enabling children and families' access to Aboriginal workers involves recognising the knowledge, skills and experience of Aboriginal people who undertake 'social work' but do not hold formal qualifications as may be required for professional registration. It is not a simple matter to apply a registration scheme that requires professional qualifications to the Aboriginal workforce in South Australia. If design and implementation of the scheme is not carefully navigated, then the systemic barriers which have historically (and still do) prevent Aboriginal people from participating in tertiary education can be expected to exclude important human resources in our sector from continuing their work.

In light of these matters, my view is that the workforce strategy should anticipate and include planning to mitigate these risks in a more fulsome and direct way. It also has an important role to play in informing relevant decision-making about the scope and implementation of the scheme.

¹⁷ OGCYP, *Guardian for Children and Young People 2022-23 Annual Report (2023)*, p. 58-59.

I look forward to further discussions with both the Department for Child Protection, and members of the Social Workers Registration Board, on strategies to prevent unintended negative consequences for children and young people.

Governance, reporting and accountability

As a final note, it is my view that the strategy would benefit from greater clarity around governance, reporting and accountability, prior to release. Being clear on who is responsible for oversight of the strategy, implementation of each of the actions and how progress will be measured will allow for a smooth transition to the implementation stage.

This is in line with my previous comments around ensuring thorough consultation and engagement in the development, release and implementation of the strategy; and providing clarity on the scope of the strategy, and the intended outcomes for children and young people.

In addition, I note that there is no description of how the outcomes listed under the section 'we will know we are successful when' will be measured. It may be useful to list some of the current mechanisms for capturing this information, such as the I Work for SA Your Voice Survey, and some of the intended data sources to be developed.

In relation to the lack of a clear outcomes framework for this strategy, I would also like to draw attention to the fact that none of the current outcomes for success related to improved quality of services, or outcomes for children, young people or families. This would be an indication of a thriving child protection and family support sector workforce, and it is worth considering inclusion of some related outcomes.

Conclusion

In this submission I have raised several concerns about the strategy as it stands. If nothing else, I hope the key takeaway is this – **the strategy must do more to promote a focus on children and young people.**

I would welcome the opportunity to discuss the strategy with the Department for Child Protection and I look forward to seeing how the current consultation shapes future directions, so that we can all work together to support the child protection and family support sector workforce and improve outcomes for children and young people.