

*at the heart of our
Community*

WACOSS PRE-BUDGET SUBMISSION
FOR THE WA STATE BUDGET 2018-19



wacoss
WA COUNCIL *of*
SOCIAL SERVICE

Ways to make a difference

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City West Lotteries House, 2 Delhi Street, West Perth WA 6005
P: 08 9420 7222 | F: 08 9486 7966 | info@wacoss.org.au | wacoss.org.au

Copies of this submission are available from the address above.

 /WACouncilofSocialService

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ABOUT WACOSS

WACOSS has a vision for an inclusive, just and equitable society. We advocate for social change to improve the wellbeing of Western Australians, and strengthen the community services that support them.

We represent three hundred member organisations and individuals, and more than five hundred organisations involved in the provision of community services to the Western Australian community.

We partner with a national network of social service councils, as one of nine peak councils across Australia, which magnifies our expertise, resources and impact, and ensures that Western Australia is represented on a national stage.

We are committed to genuine collaboration through a shared resourcing approach and capacity building, and seek to be the voice of the community service sector as a whole. Our participation on consultative committees and forums helps us to understand the sector and community needs in an environment of complexity.

We build trusted relationships with government and non-government influencers, which enables our members to access government and amplifies the expertise of community sector organisations and experiences of the community.

We tackle hard issues, inform and challenge policy, systems, behaviours and attitudes that contribute to inequality, exclusion and disadvantage.

FOREWORD

It is easy to look at our society and see insurmountable problems. Unemployment. Homelessness. The emergence of the precariat. The overrepresentation of Aboriginal people in our justice and out-of-home care systems.

There is no question that we face significant, often daunting challenges. How we face those challenges together and the way we rise to meet them together really matters. The compassion and dedication, the good-will and sense of camaraderie, the value placed on the lives of each and every member of our community, the willingness to listen and to get behind those who face life's barriers – these are the things that inspire and humble us. We recognise and acknowledge this commitment and care are shared in local community services across our state, that they drive people to dedicate their lives to public service, and that they inspire the tremendous efforts of families and carers who will do anything for those they love.

So, while our efforts to advocate for the vulnerable and marginalised may lead us to focus on the problems, barriers and systems that frustrate us, let us not lose sight of this combined commitment, passion and dedicated effort to make the world a better place that lies at the heart of our community. Let us strive together starting from this common core of shared value.

The 2018/19 WACOSS Pre-Budget Submission proposes an approach to government that puts people at the centre of decision-making and empowers local communities to drive systemic transformations that target their biggest needs and highest aspirations.

We suggest strategic directions for whole-of-government reform that bring together our best and brightest to spearhead change. For a system that better supports children, young people and families; a more ambitious approach to social housing and security of tenure; an approach to justice that focuses on diversion and rehabilitation; a sustainable community services sector that grows the capacity of Aboriginal controlled services to close the gap in life opportunities and outcomes; and concessions and support that build financial resilience during tight times.

More than simply a budget submission, *At The Heart of Our Community* is a blueprint for social and economic change to help achieve the inclusive, just and equitable society we all desire.

We recognise the tight fiscal situation that the State Government finds itself in, and we caution that hard-line austerity without protecting our most vulnerable will only cause systemic costs to grow, undermine our economy and disadvantage further those already vulnerable. Smarter, more responsive, better integrated services, and a timed-transition to early intervention and prevention can deliver long-term savings, better outcomes and strengthen our shared future. Without a change in direction, the unsustainable demand on expensive tertiary services will continue.

The recent State election provides a clear mandate for progressive change, re-balancing our economy to reduce growing inequality and build a vibrant and diverse future we can all share and pass on to our children. Where fairness, opportunity and compassion are at the heart of our community. Together we can make it a reality.

Debra Zanella
WACOSS President

Louise Giolitto
WACOSS CEO

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Strategic Policy

CITIZENS AT THE CENTRE

Putting citizens at the centre of public services means having a proper appreciation of Western Australians – not simply as individual service users, but as embedded in families, in places and local communities, communities of interest and historical contexts. Citizen-centred planning can often mean identifying that those best able to assist and support someone facing personal challenges and vulnerabilities may be those closest to them.

To do this effectively, the WA Government needs to recognise that a focus on citizens is more than a focus on individuals and commit to community development processes that facilitate and support local initiatives, active participation, volunteering and peer support. This will include providing simple mechanisms for meaningful service user feedback and evaluation of how effective services are in meeting their aspirations and agreed outcomes. Co-design and evaluation processes that engage service users and those with lived experience of overcoming disadvantage can play a critical role in making our services more effective (as discussed on page 10).

WA Labor's Supporting Communities election policy committed to work with the community services sector to break down barriers between government and stakeholders, to streamline procurement processes and cut red tape for the community sector. It also promised to improve funding security and trial more collaborative (and less competitive) funding models, and to deliver an agreed-upon framework to measure outcomes across the community services sector.

The Government has started to put these commitments into practice through machinery of government changes, undertaking a Service Priority Review (SPR) to identify further reform directions, and by engaging with the community sector to form a Supporting Communities Forum (SCF). This creates a degree of uncertainty concerning how these election commitments will be put into practice, but also provides a unique opportunity for the sector and the Council to make a positive contribution to the development of better and more effective services and supports for the WA community. In this context, we have developed these strategic policy recommendations with a focus on outcomes, recognising the changing reform

landscape. We would welcome opportunities for further dialog to ensure effective implementation when the wider reform context is resolved.

Engaged and empowered citizens are at the heart of a healthy and resilient community

The interim report by the SPR Panel identified four key themes, the first of which was customer-focused and outcomes based service design and delivery. The aspiration to put the ‘public’ or the citizen at the centre of public services is not a new one, and was a key focus of community service and social policy reforms during the previous two terms of government.¹ In this context, it is critical that we learn from the comparative successes and failures of previous efforts and identify the cultural or systemic barriers that limited previous reforms, while building on the knowledge, experience and the relationships and trust these efforts engendered.

One key lesson is that changing policies and tweaking administrative processes alone is not enough – we need to fundamentally change the service culture in the public and community sectors to ensure that the voice, needs, goals and aspirations of citizens are truly at the centre. High-level commitments need to be backed up by procedural requirements, accountability mechanisms and resources that ensure there are processes in place for real citizen engagement – with checks and standards that ensure it is meaningful and appropriate.

RECOMMENDATION: Put citizens at the centre of whole of government reform

¹ It was the central recommendation of the “Putting the public first” report of the Economic Audit Committee (the 2010 version of the Service Priority Review), implemented through the Delivering Community Services in Partnership Policy and overseen by the Partnership Forum

SPEARHEADING CHANGE ACROSS GOVERNMENT

The agenda outlined by the incoming government through its Supporting Communities policy and the significant cultural change recommended by the Service Priority Review panel to drive a shared service culture across the public service requires leadership and a common approach. One way to achieve this is to form a leadership team of the best and brightest across government, seconded part-time into a central Social Policy Evaluation And Research unit (SPEAR) while remaining engaged in leading reform within their department or agency. The cross-government leadership team would collaborate on flagship reform projects, actively sharing their learnings to develop more effective and efficient service systems (p 9) and drive an outcomes-focused culture across public and community services.

RECOMMENDATION: Establish **cross-government leadership teams** to implement reform

Being part of a central team delivering important whole-of-government reforms should be an exciting professional development opportunity that increases their depth of understanding of human service issues, extends their networks and professional development, while also providing a shared approach to capacity building and leadership of cultural change. The initiative would sit within the Department of Premier and Cabinet (DPC) and include senior leadership from Department of Treasury overseeing implementation of the Evaluation Initiative, the leaders of the co-design program and data linkage initiative, as well as those leading regional place-based collective impact reforms. It might also include formal or informal participation from those with social policy and evaluation expertise from the community sector. Selection should be based on enthusiasm and ability to collaborate, as well as the capability for systems thinking and a track record of achievement.

RECOMMENDATION: Create a cross-government **Social Policy Evaluation and Research unit** (SPEAR) in the Department of Premier and Cabinet

The unit would be tasked with:

- Leading implementation of the recommendations of the Service Priority Review.
- Developing the outcomes framework for Our Communities reporting (p 16)
- Developing proposals, frameworks and initiatives and providing advice to the Supporting Communities Forum and the Cabinet Community Safety and Family Support Sub-Committee (p 13)
- Developing guidelines and procedures for the Co-design program fund (p 10)
- Collaborating with relevant expertise to develop a data linkage framework (p 18)
- Leading the services evaluation and early intervention initiatives (p 21)
- Developing a framework and practice guidelines for Regional Managers Forums to commission place-based integrated services (p 15)

The investment of time, effort and resources into place-based reform, service integration and outcomes frameworks will only see success if we are ‘completing the loop’ to ensure that the evaluation of service outcomes is driving investment decisions. In structural terms, this capacity should be located within Treasury. For such an initiative to succeed and be trusted and supported by the community sector it would require a degree of transparency and engagement from Treasury that is a departure from business as usual, necessitating a cultural shift. These strategic policy recommendations include discussion of whole-of-service-system planning with a focus on rebalancing systemic investment over time through more effective secondary services, early intervention and diversion. This requires a combination of economic expertise and social policy analysis that might be best achieved by a team within the SPEAR unit in DPC including senior leadership seconded from Treasury.

RECOMMENDATION: Form an **Evaluation Initiative** in SPEAR with senior leadership from Treasury

SERVICE SYSTEM PLANNING

Service integration and place-based collective impact approaches offer significant opportunities to redirect fragmented program and service funding to deliver more joined up and transformative outcomes, reducing the burden of managing and reporting against multiple service contracts to deliver a single on-the-ground support service. Effective outcomes for those with multiple and persistent needs will not be achieved within one department or portfolio alone, but require an integrated approach across our service system.

Comparatively small cohorts are accessing multiple services and supports at significant cost, but are seeing poor outcomes. Collective impact trials need to be linked to a rigorous evaluation initiative that allows us to demonstrate longer-term savings across our service system.

RECOMMENDATION: Establish mechanisms that drive **service system planning** for collective impact

A CO-DESIGN PROGRAM FUND

Co-design is about designing and delivering community services in a partnership – an equal and reciprocal relationship – between funders, service providers and the people using services (and often their carers, families and others in their community). Good co-design, informed by good data on community, cohort and existing service performance, can deliver integrated wrap-around service systems that tackle the underlying causes of disadvantage to deliver transformative life outcomes.

Co-design is a key mechanism for driving human service system reform where existing services and service systems are failing. It can improve most services, programs and service systems, but co-design processes take time and resources to be done properly and effectively. Not every service or program needs to be co-designed and if it is applied too widely, quickly and shallowly, this will undermine the opportunity to use co-design where it is most needed. Co-design efforts should be focused in areas where existing service models are inadequate because of systemic complexity, entrenched disadvantage, or participation is required across multiple disciplines and portfolios.

Recent program level co-design processes have highlighted the willingness of key stakeholders to work together in order to design better support services and have demonstrated some promising initial design improvements. They have also emphasised a number of the challenges, including ensuring co-design principles are understood and adhered to; maintaining transparency and accountability; and balancing the open sharing of information against the requirements of competitive tendering.

There is a clear need for a consistent approach to service co-design and commissioning processes across government, and to build the capacity of the public and community sectors to lead and participate in effective co-design processes. The WACOSS Co-Design Toolkit, developed under the guidance of the Partnership Forum Co-Design working group, covers the essential elements of effective co-design and

provides a sound basis for such a consistent approach. The Council recommends that the Co-Design Toolkit be endorsed by the Supporting Communities Forum and promoted across Government by the Funding and Contracting Services (FACS) Unit of the Department of Finance, as a guide to co-design in WA.

The best way to ensure consistency, build capacity and quickly leverage the learnings of co-design initiatives and place-based trials is through a central Co-Design Program and Fund. The program would facilitate access to centralised expertise, evaluation and shared learnings. It could also build on the Co-Design Toolkit to develop further standards and resources, and provide guidance on processes and procedures. The program fund might best be located in the FACS unit with its design developed in close collaboration with the Social Policy Evaluation and Research Unit, and oversight from the SCF and ongoing reporting to the Cabinet Sub-Committee. SPEAR might lead development of the framework and program logic, and oversee additional resource development, to then be implemented through the program fund.

The new SCF will be well-placed to continue the governance and oversight role previously played by the Partnership Forum with the Delivering Community Services in Partnership Policy (DCSP), by providing oversight of the development of policies and procedures to systemically embed co-design into government procurement and strategy development. We will expect the new co-design program to regularly report back on projects supported, evaluation outcomes and lessons learned. We also expect that government agencies will continue to apply co-design processes at an individual program level during this time (with some advice and support), while the focus of the Co-Design Program Fund will be on larger-scale and more challenging ‘flagship’ co-design projects. Access to program resources would enable more comprehensive co-design and evaluation processes to be undertaken, and may initially support access to expert independent facilitation while programs and agencies are developing their capacity in this area.

RECOMMENDATION: Develop a Co-Design Program Fund to provide central advice, resources and access to expertise for government agencies undertaking flagship integrated service initiatives

BUILDING CULTURE AND CAPACITY

First, we need to build the capability of both public and community sectors so that contract managers and service coordinators can deliver place-based integrated services. This requires developing processes and a change of culture and practice in both sectors. Regional human service managers need clear direction and support from their departments that empowers them to engage in collaborative design and make decisions.

Secondly, we need to ensure there is a mechanism to allow the combining of resources across existing programs and departments to commission place-based integrated services. The shift from accountability for individual program budgets with specified deliverables to a wider accountability for achieving strategic outcomes, and longer-term cohort and population targets has been a critical component of the machinery of government reforms in New Zealand. There is clearly a role for Treasury in developing and delivering a pooled budgeting and contracting model that supports place-based service integration, with clear reporting and due diligence.

Thirdly, we need a clear model of decision-making and accountability for the joint commissioning process. This requires agreement on shared reporting and accountability frameworks where all agencies and services jointly report to the Cabinet Sub-Committee with the oversight of the SCF for the delivery of shared outcomes against local plans and targets.

The amalgamation of several existing agencies into the Department for Communities provides an opportunity to take a more place-based and integrated approach. The Council recommends the WA Government resource a series of trials of place-based joint commissioning, ensuring service providers, service users, and those with lived experience are partners in their co-design and evaluation. Regional Supporting Communities Forums will play a pivotal role in ensuring there is a strong governance model and community engagement process to co-design, implement and evaluate these place-based trials.

RECOGNISING AND SUPPORTING ALREADY INTEGRATED SERVICES

There are many examples where community service providers are already bringing together funding from multiple government departments, programs and grants to deliver a single integrated service – sometimes combining both state and federal funding, as well as charitable donations.

We recommend introducing a process across government to agree on a single set of service outcome measures that the service provider reports against across these contracts as a first step, then reviewing and where possible amalgamating existing

arrangements into a single aligned contract over time. This process might be undertaken by the FACS Unit in Department of Finance, based on a model developed with SPEAR. We recommend an open application process driven by relatively simple pro-forma in which the service model can be explained and existing contracts appended.

While this approach will reduce administration and reporting for both sectors, the potential benefits are much wider. A review of existing integrated services – how they have emerged, the need they are responding to and their comparative impact – may help to develop integrated models driven by community needs. Different providers may have responded to need and funding opportunities in different ways in different locales, providing an opportunity to compare different support models.

RECOMMENDATION: Put in place an initiative for service providers already delivering integrated service models to agree to a single reporting framework and simpler funding arrangements

THE SUPPORTING COMMUNITIES FORUM

The relationship between public and community sectors during the last two terms of government was defined by the DCSP Policy and overseen by the Partnership Forum. The challenges the Forum identified were real, the aspirations for a more cooperative approach to delivering collective impact (embodied in the Partnership Principles and Behaviours) were laudable, and it led to some strong relationships being built and important reforms developed. However, in the absence of clear mechanisms to drive whole of government reforms it ultimately met with only limited success in implementing its agenda. WACOSS was both an active partner in these arrangements and a constructive critic of their limitations.

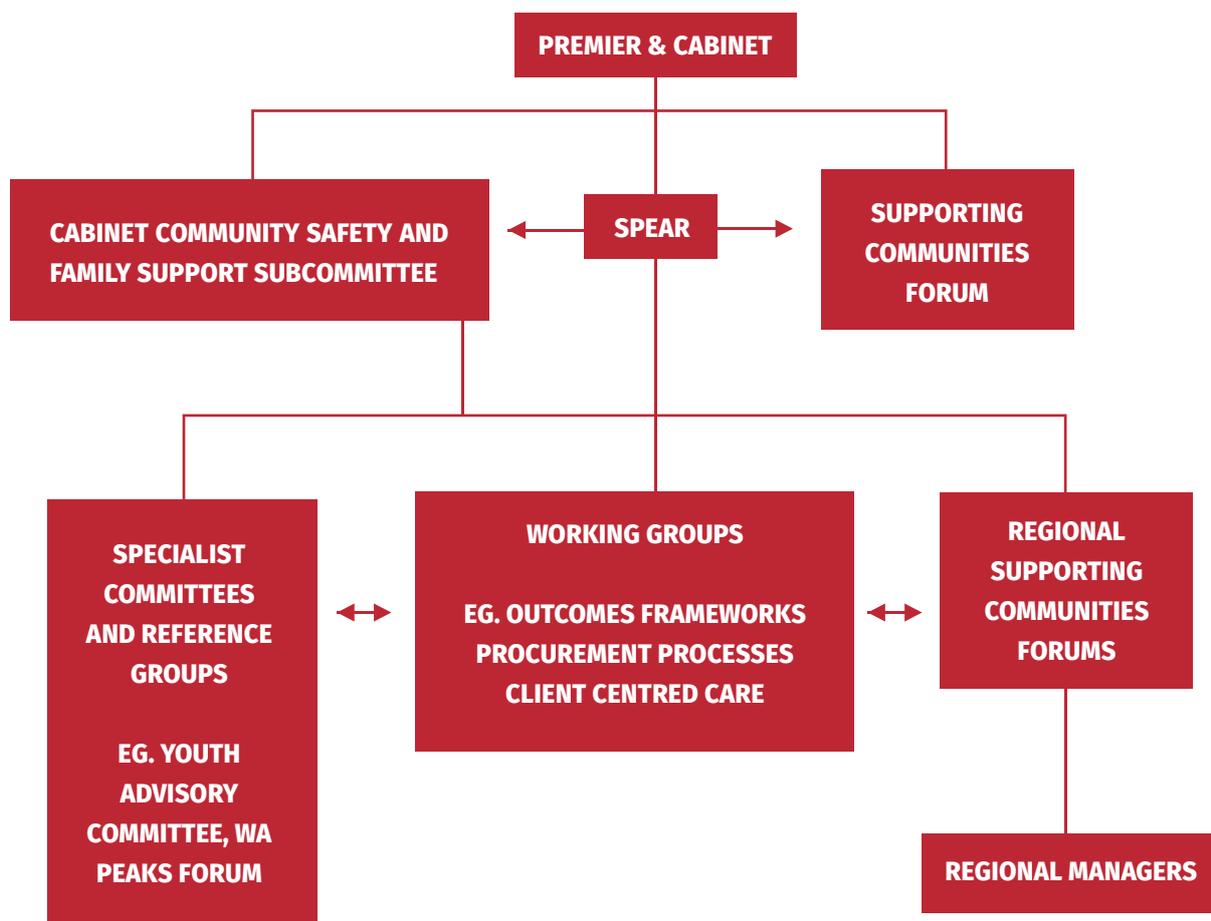
Over time, the Partnership Forum became increasingly less effective due to the combination of a lack of capacity to drive change across Government, not having key players at the table, and lack of capacity and resourcing to enact decisions. A new model for the Forum needs to address these issues.

WACOSS suggests that the overarching purpose of its replacement, the new Supporting Communities Forum, should be to develop and implement a social policy and community service reform agenda that is grounded in a relationship of partnership and mutual respect between the public and community services sectors, and is focused on achieving better outcomes for the WA community, particularly our most vulnerable and excluded citizens.

While there is a clear need for a high-level mechanism for sector engagement with public sector leaders and policy makers to drive whole of government human services reform, the proposed SCF is only one mechanism for engagement. Though necessary, alone it is unlikely to be sufficient to succeed in driving cultural change and service system reform. There needs to be a range of mechanisms to enable more effective engagement and implementation at disciplinary, regional and local levels with a wider range of stakeholders. The Council recommends that the existing consultative mechanisms and advisory committees used at Departmental, portfolio and program levels should be reviewed in light of machinery of government changes to identify opportunities to improve alignment, reduce duplication and improve information sharing and process integration.

The SCF should build upon the agreed principles and behaviours with increased focus on and commitment to cross-government implementation. It should also incorporate a range of workshop and facilitated discussion processes to support wider engagement across both sectors, linking with other existing consultative mechanisms to enable greater input and impact. The WA Peaks Forum can play a strong supporting role, with many of its members actively engaged in reform processes at a disciplinary level and contributing through other consultative forums. We also suggest empowering SCF Sub-Committees to include broader membership to oversee and progress specific reforms in priority areas.

RECOMMENDATION: Drive reform and link consultative mechanisms through the Supporting Communities Forum



REGIONAL SUPPORTING COMMUNITIES FORUMS

Regional Managers Forums and District Leadership Groups, together with Strategic Regional Advisory Councils in the Kimberley and Pilbara have begun developing a more collaborative approach to regional service delivery. These reforms create the possibility for a more inclusive and joined-up approach to regional social planning, together with greater coordination of service system design to create more integrated, responsive and appropriate regional services and deliver stronger, more sustainable outcomes.

The engagement of existing regional human service managers' forums with local community service providers and community leaders, backed by clear direction and endorsement at high levels within the State Government and public service, can create a mechanism for place-based decision making. The work of the South West Metropolitan Partnership forum in Davis Park, Beaconsfield provides an excellent case-study of local collaboration mobilizing existing resources to achieve collective impact.

Collaboration is at the heart of delivering more effective services for our regional communities

The Council **recommends** that existing Regional Managers Forums and District Leadership Groups are empowered and resourced to become Regional Supporting Communities Forums, including local community leaders as equal partners (consistent with the partnership principles and behaviours).

These Regional Supporting Communities Forums would drive local engagement and planning processes to oversee the implementation of these place-based joint-commissioning trials. WACOSS recommends that their activities are supported by a framework and practice guidelines for commissioning place-based integrated services, developed by the SPEAR unit. As members of that unit, regional managers would share their learnings and contribute to the further development and refinement of practice guidelines and outcomes frameworks, providing updates on challenges, successes to the SCF and the Cabinet Community Safety and Family Support Subcommittee.

RECOMMENDATION: Empower Regional Supporting Communities Forums to implement place-based service integration

BUILD AN OUR COMMUNITIES OUTCOMES FRAMEWORK

The ability of the public and community sectors to deliver more effective services and design better integrated service systems has been hampered by the lack of consistent and comparable measurement of service outcomes and the lack of transparent program review processes driving service investment prioritisation and system design. The Council believes it is essential that outcomes frameworks and whole of government targets are developed to drive service system evaluation and improvement.

In the absence of common outcome frameworks within and across government agencies, much of our existing service and program level data is fragmented and incommensurate – simply not suitable for the task of measuring how effectively we are tackling the key problems at a local, cohort or population level. Many community service providers have implemented their own data systems and evaluation frameworks to improve the quality of their services.

The end result is an undesirable level of fragmentation. Without some central leadership and process for agreeing on common frameworks, standards and models, community services may be reluctant to invest time and energy in developing systems and building evaluative capacity, or will continue to act individually and focus on the outcomes and metrics most relevant to their mission and operating environment.

Work in the early years has demonstrated the value of having a common framework for assessing developmental vulnerability, with the Australian Early Development Census providing a foundation for implementing collective impact approaches and enabling a better understanding of the lifelong return on investment in early childhood education and care. Governments may be reluctant to commit to the full cost of undertaking this work, but should also be mindful of the opportunities to partner with the Commonwealth, other state governments, research institutions and the community sector to develop shared projects that align with major research and development priorities and can attract matching funding.

There is clearly a pressing need to develop a shared outcomes framework to measure meaningful progress and service performance against agreed priorities using common data protocols. The Government's commitment to deliver an agreed-upon framework to measure outcomes across the community services sector and produce a biennial Our Communities Report could provide the impetus to make this happen. Both the Regional Service Reform Unit and the Service Priority Review Panel have found the task of evaluating service impacts and analysing their return on investment hampered by the lack of common performance measures and meaningful data on community need and service location.

The proposed Supporting Communities Forum (together with Regional Supporting Communities Forums implementing place-based integrated service reforms) can play a key oversight and coordination role in the co-development of these outcome frameworks and co-design of outcome measures and protocols.

The Council **recommends** that the biennial Our Communities report be an open collaboration between the public and community sectors – both in terms of developing the framework and measures, and in incorporating reporting from Departments, Community Sector Peaks and independent researchers as appropriate.

The Council has sought resources to ensure it has the capacity to contribute to the collaborative development of an Our Communities outcomes framework on behalf of the community services sector. We secured a Capacity Building Grant via the Department of Finance to identify current community sector practice, contribute to research of existing frameworks, and make recommendations for a suitable outcomes measurement framework for the WA community services sector. Our intent is to develop an evidence-based framework that is supported by community stakeholders, fit for purpose, and of value to the WA government in assessing community need and making service system investment decisions. Our priorities are to develop a framework that acts as a key driver and enabler of flexible, targeted and collaborative

approaches to service design and commissioning; innovative service delivery; and a more consistent and effective whole-of-government and whole-of sector approach. This is how we can contribute to this collaborative venture.

The Council also recommends that the WA Government commits to genuine community consultation, with a regular survey of needs, priorities and aspirations included as part of the Our Communities report.

RECOMMENDATION: Build an Our Communities Outcomes Framework to enable whole-of-government reporting

DATA LINKAGE

Better access to quality data, together with the capacity to link and analyse information can be a driver of both economic and social innovation. Proactive implementation of the WA Open Data Policy, and further development of principles and practice to catch up with initiatives in other states must be a priority. Good policy and enabling resources can open up the possibility to better measure outcomes and demonstrate return on investment, and to better understand risk factors and target at-risk cohorts to enable earlier intervention strategies.

There is significant public sector data on community need and service outcomes, including data generated by the reporting of contracted services. Western Australia has significant opportunity and potential to develop data linkage capacities to provide transformative outcomes for the community. Once a leader on data linkage, research and innovation, WA now lags behind developments in other states.

Fundamental barriers to data linkage in WA are the lack of explicit data standards and protocols across government departments and agencies, and the lack of central leadership driving the interpretation and promotion of data. A central data linkage and analysis unit is needed, to bring together expertise across the public (and research and community) sectors to drive innovation in priority areas to increase social impact and deliver better returns on public resources. The Council supports the recommendations of the 2016 Data Linkage Expert Advisory Group Review, particularly calls for creating a data linkage statutory body, proactive policy to drive impact and innovation, enabling legislation, ethics oversight and resources to make it happen.²

² Data Linkage Expert Advisory Group (2016) *Developing a whole-of-government data linkage model: A Review of Western Australia's data linkage capabilities*

Data needs to be at the centre of policy development and evaluation in this state, but in order for that to occur, there needs to be clear leadership in setting priorities for social and ‘public good’ outcomes, and a mechanism for commissioning and pooling the research and analysis.

The absence of privacy laws in WA potentially creates a barrier to data sharing, as Commonwealth agencies and other jurisdictions can be reluctant to share and link data without clear assurances of privacy protection and compliance. State government agencies are often reluctant to share and link data in the context of a lack of clear guidelines and protocols, falling back onto restricting access through undue caution in the absence of enabling legislation and a systemic obligation to share data in the public’s best interest. To this end, we recommend the state government prioritise the introduction of enabling privacy legislation and progress the WA Open Data Policy to make clear the expectation and onus to share for the public good.

There is no central database of social research in WA that agencies, services and researchers can draw upon to facilitate policy development and service design, to align measurement and ensure prospective research adds to the knowledge base. Other jurisdictions in Australia have developed central data repositories, removed charges and bureaucratic barriers to data sharing and invested in proactively seeking opportunities to use data access and linkage to drive innovation, economic activity and better community outcomes.

RECOMMENDATION: Progress the WA Open Data Policy through a central data linkage unit and framework with enabling legislation to proactively develop innovative linkage projects

WHOLE OF GOVERNMENT HUMAN SERVICE DIRECTORY

Better information on population need, service coverage and outcomes is critical to improve service access and to enable service system planning and evaluation. The ability of the Service Priority Review to effectively evaluate and make recommendations for service system improvements (and the efforts of the Regional Service Reform Unit to map public investment and gaps in service coverage) have been hampered by the lack of a clear and consistent approach to reporting. The Council has consistently raised concern with the lack of information on service coverage and the misalignment of agency reporting boundaries across government. What is required is simple and does not place inappropriate additional reporting burden onto services – all that is needed is consistent policy and reporting requirements across government.

We are advocating for establishing a simpler approach that will progressively see new service contracts directly reporting meaningful and consistent information. While we understand that there may be some need for individual government departments to continue using their existing district or regional boundaries for internal management purposes, we recommend that all new service contracts report service coverage against postcodes.³

The Council recently developed a simple, intuitive and accessible interactive directory for emergency relief services that enables service providers to take control of updating their own data. There is no reason why existing tendering and reporting forms and processes cannot be simply updated to ensure location and service type, service cohort (and in time, outcomes) are automatically imported into a whole-of-government service database.

Advances in technology and the ability to produce more integrated cross-government information systems create both opportunities and risks for human service delivery. In our consultations with local and regional services, the Council has been concerned to hear of the extent to which many local web access initiatives and support services (including those in community resource centres and local government libraries) have been overwhelmed by demand from citizens needing support to access transactional and support services that have been moved online. By far the main culprits are social security and Medicare services, with local councils and state programs effectively back-filling and cross-subsidising the services required to enable citizens to access basic federal entitlements, respond to demands or pursue simple inquiries.

³ Postcodes are likely to remain the easiest and most consistent. ABS statistical local area boundaries for example change over time due to population shifts across electorates, and functions are available to remap to postcodes

The Council raised concerns with the unintended consequences of a digital service delivery strategy that seeks to shift services online as a means of reducing costs.⁴ We are particularly concerned by the risk of digital exclusion for those lacking knowledge, skills and access (such as the elderly, the educationally disadvantaged or physically impaired, and those in regional and remote locations). We instead recommend a digital transformation strategy that leverages the knowledge and skills of existing Departmental offices and front-line staff to transform them into whole of government service shopfronts. This approach ensures that there is still a human point of contact for citizens seeking transactional or support services, and transfers the onus of learning and navigating new systems from the wider community to public servants in service delivery roles.

RECOMMENDATION: Create an interactive directory of services

WHOLE OF GOVERNMENT STRATEGIES FOR COLLECTIVE IMPACT

The Council's strategic policy recommendations have focused on opportunities and mechanisms to drive whole of government reforms with the aim of delivering more linked-up, cost-effective and transformative services that will deliver better community outcomes. Our suggestions so far have focused on creating effective cross-government leadership teams and putting in place mechanisms to enable collaborative design, funding and reporting of community services at local, regional and statewide levels.

There are a number of key areas of community need where the Council believes these elements need to be brought together in a planned and coordinated fashion if they are to overcome current systemic barriers to deliver collective impact. These are predominantly areas where current services and supports are fragmented across multiple government agencies, disciplines and portfolios. This can mean individuals and families may be accessing multiple services and supports on a repeated or ongoing basis without managing to address the underlying causes of a problem or need.

Youth services have consistently been identified as an area where there is a predominance of short-term and once-off grant funding with a lack of identified measurable outcomes, across a large range of government agencies and funding

⁴ WACOSS (2017) *Submission to the Service Priority Review*

bodies. We recommend an audit of youth service funding with a view to consolidate programs and co-design needs-based service systems in collaboration with the youth services sector, young people and the sector peak. Young people leaving state care and youth at-risk within the justice system are discussed in more detail below. These are a comparatively small cohort of young people for whom the state has a responsibility and duty of care, who have extensive contact with multiple departments and services, and who demonstrate some of the worst life outcomes and highest systemic costs within our community. We recommend a whole of government youth services plan that combines universal and out-reach youth services with more intensive and targeted diversionary and support services. The plan should develop a vision of a flexible and responsive youth services system that seeks to improve outcomes and shift investment over time from tertiary and crisis services to secondary and diversionary ones.

Western Australia also does not have an overarching Plan for Children. The sector reports that the absence of a strategic children's policy framework results in services remaining siloed and families experiencing gaps or duplication in services. A comprehensive plan for children that sets policy direction and outcomes would assist in driving unified and collaborative approaches to improving the wellbeing of all children and families. It could also underpin integrated service system design across the continuum of universal, secondary and tertiary services, shape investment and allow better evaluation of return on investment.

There are other areas where impacts and responses cut across multiple programs and departments, requiring a whole of government approach. Domestic and family violence is a prime example where there has been significant recent investment, collaboration and commitment that can be built on through a strategic approach (p 33). Fetal Alcohol Spectrum Disorder is not a new issue, but one where our awareness of pervasiveness and impacts through the life course has increased dramatically. Improved community awareness, diagnosis and knowledge and skills for those working with children, young people and adults with FASD requires a joined-up approach (see p 36).

A key challenge across all of these strategies is the need for whole-of-service-system planning and design – the ability to ensure that our primary and universal services are accessible and appropriate and designed in a way that enables them to respond effectively to those most in need to provide access to more intensive and transformative services – ultimately producing better life outcomes and reducing the long-term costs of care.

Our community faces a significant challenge with the growing cost of tertiary and acute services for particular marginalised and at-risk cohorts. The most stark and pressing examples can be found in our justice and child protection systems (particularly in relation to Aboriginal children and young people), but similar problems can also be found in the plight of young people leaving state care or the systemic health and

community service costs arising from homelessness. Poverty, lack of opportunity and family trauma interact with the complexities and inappropriateness of our service system and a fundamental lack of trust arising from a history of bad policy interventions.

An evidence-based approach is needed to effectively tackle the problem of demonstrating the change created and resources saved by preventative and diversionary strategies. There are two key challenges. First, how do we convincingly prove that we have reached those most at risk and achieved a transformative outcome? That is, given their history, circumstances and needs were it not for our intervention they would have achieved an undesirable life outcome resulting in much higher ongoing service system costs. Secondly, how do we refine our data analysis and service systems to ensure that we are providing support when it will make the most difference for the least cost?

Data linkage and predictive risk management tools can play a role in assisting early identification of those at risk, but this approach needs to be grounded in the local knowledge and professional judgement of trusted support workers to ensure it does not merely confirm systemic biases within our reporting. Better integrated service system design, where trusted and culturally appropriate primary and universal services provide opportunities for early identification, responsive support and referral may provide a more robust system. This is evidenced, for instance, by the much lower rates of child hospitalisation for abuse-related physical harm and death in European child protection systems with a family support orientation (compared to the forensic risk management approach taken in Anglophone countries like the US, UK and Australia).⁵

To this end we recommend the introduction of an early investment initiative, designed by SPEAR and monitored by the evaluation initiative led by Treasury, in collaboration with leading local researchers and with priorities identified by the Cabinet sub-committee and SCF. The aim of the initiative would be to compare and contrast the evidence from different early intervention and diversion strategies (including Target 120, 50 Homes 50 Lives, Earlier Intervention Family Support, and Aboriginal Intensive Family Support Services) to identify the most effective means of targeting or engaging at-risk cohorts and the most cost-effective support models to deliver sustained and transformative outcomes, and to quantify the longer term savings across the service system.

RECOMMENDATION: Develop a whole of government early intervention initiative to reduce the growing cost of tertiary services

⁵ For instance, see the systemic reviews by Gilbert et.al 2012, Lonne et.al. 2013, Churchill and Fawcett 2016



MIDLAND/CITY OF SWAN

Almost 110,000 people live in the City of Swan and which encompasses both rural and urban areas. Midland is the region's main centre, and many services are provided to the community on a hub and spoke basis from here. The largest Aboriginal population in the metropolitan area lives in the City of Swan and the region is also home to a significant culturally and linguistically diverse community, with about 30 per cent of the population born overseas.

There are some demographic themes that connect across the City of Swan. Most suburbs within the region have a lower Socio-Economic Index for Areas (SEIFA) rank. Domestic and family violence and a general lack of public transport are cited as factors that contribute to the isolation of vulnerable people and families in the Swan area. Clusters of public housing are located throughout the region. These tend to have a high profile for community service providers and government departments alike, as ways to best support disadvantaged households and address localised anti-social behaviours are explored and advocated. There are also variations in the needs of populations in the different residential areas within the City of Swan. For instance, Ellenbrook has a very young median age with more people under 25 years than over 25, and Bullsbrook has an aging population with a higher proportion of retired people. Some services are very reliant on the invaluable contribution of volunteers. Strong interagency networks and community celebrations are also a prominent feature of the region. Children's Week is officially launched at Whiteman Park each year, which more than 10,000 attend.



Children, young people & families

CO-DESIGNING A COMPREHENSIVE ABORIGINAL CHILD PROTECTION SYSTEM

The disproportionate number of Aboriginal children in out of home care continues to grow. As of June 2017, 2603 of the 4795 children in care were Aboriginal, making up 54% of all children in care in WA. While reforms to our child protection system, such as the introduction of Family Support Networks seem to have stabilised the number of non-Aboriginal children going into state care they have had little or no impact on rising rates for Aboriginal children. Further, statutory authorities continue to struggle to meet the Aboriginal child placement principle target of 80%, reaching only 64% in 2016/17. Clearly a different approach is needed to reduce the growing cost and worsening outcomes for Aboriginal families in WA.

The Council **recommends** a state-level forum to co-design a comprehensive Aboriginal child protection service system, including prevention, early intervention and statutory responses.⁶ The forum would include child protection leadership from the Department of Communities, Aboriginal community-controlled and mainstream services, regional representation and consumer advocates. While not wanting to pre-suppose the outcomes of this process, we would expect that, building on best practice in other jurisdictions, it would:

⁶ For more information see the joint *Submission to the Review of the Children and Community Services Act 2004 (WA)* by SNAICC, Family Matters WA and NCPC

- Establish a state-wide Aboriginal child protection peak body based on regional representation to provide a voice on legislation, policy and program design
- Develop the Aboriginal community-controlled sector across regional divisions, including a recognized entity model that provides systemic advocacy and supportive case management for Aboriginal children working alongside child protection staff within the statutory system
- An Aboriginal intensive family support program that delivers universal prevention services as well as diversion and reunification support

The Council is providing back-of-house support for the formation of the Noongar Child Protection Council, at the request of community leaders. We support the vision of a peak body comprised of Elders, advocates and community-controlled services to stand up for Aboriginal children in the child protection system and ensure children and families are connected to community, culture and country. We offer our assistance and support to other Aboriginal nations seeking to develop regional representation and advocacy, and look forward to when all regions of WA are well represented and adequately resourced to come together to form a state-wide peak body (as in other states). The NCPC and WACOSS partner with and support the Secretariat for National Aboriginal and Islander Child Care (SNAICC) and the Family Matters Roadmap for reform.⁷

RECOMMENDATION: Co-design a comprehensive Aboriginal child protection service system

AVAILABILITY AND EFFECTIVENESS OF SECONDARY SERVICES

Stronger families are integral to the social capital of a community. Research on childhood development provides clear evidence of the value of early investment in universal education and care services, particularly for children with developmental vulnerabilities and those growing up in disadvantaged areas. Crisis and tertiary services will continue to be needed to support children and families experiencing entrenched problems and facing intergenerational trauma, but the more we can build on the strengths and increase the resilience of families through trusted and

⁷ SNAICC, *Family Matters Roadmap*

responsive secondary services, the more we can deliver better outcomes from our service investment.

Recently there has been a welcome increase in funding for services targeted at keeping children at risk of entering care from doing so. In particular, the Council commends the expansion of Family Support Networks (FSN) in the Perth metropolitan area, and the complementary Intensive Family Support Service (IFSS) and Aboriginal In-Home Support Service (AIHSS) to address the drivers of child removal. We have raised some concerns, however, about the service commissioning process, tight tendering timelines and lack of opportunity for effective service co-design processes. We are also concerned that the manner in which FSN geographical service boundaries are being expanded will effectively result in a doubling of service catchments without a concomitant increase in funding – forcing further prioritisation of services that mean some families in need may miss the support critical to keeping children safe and families together. FSNs have not engaged as well with Aboriginal families and Aboriginal community-controlled secondary services need to play a more central role.

The Council recommends continuing the state-wide roll-out of Family Support Networks – ensuring adequate funding is provided to meet community need and meaningful engagement with Aboriginal families and services.

RECOMMENDATION: Increase the availability and effectiveness of secondary services for children, young people and families to reduce service system costs

IN-REACH FAMILY SUPPORT

Properly resourced secondary family support can be a circuit breaker of a family's intergenerational involvement with tertiary services, and thus represent a future saving to government. In the case of Aboriginal families, where the legacy of past child removal practices has meant a lack of experience of parenting has combined with unresolved inter-generational trauma to increase family dysfunction, the state has a moral obligation to put right the unintended consequences of past policies.

For a variety of reasons, some families in need encounter barriers to accessing services. These barriers are often not insurmountable, but without appropriate support their circumstances are likely to deteriorate, leading to statutory intervention. There are many factors that can contribute to a family's isolation – mismatch of family needs and supports available, cultural and language differences, lack of trust in mainstream or faith-based services, access to transport, low self-confidence, histories of trauma, and so on.

In-reach family support services are not new, and there have been many iterations of these service models over the years, that assist families to get on top of life's challenges and create a sustainable sense of normalcy. The earlier Homemaker program provided assistance with parenting, managing household budgets and establishing routines, perceived by many families as responding to their practical support needs without stigma. This mix of practical, educational, therapeutic and advocacy supports has been found to be most effective in responding to family needs and enhancing family's welfare.⁸ A strengths-based non-judgmental approach, where there is time for workers to authentically and effectively engage with families, and tailor flexible support plans to meet the needs of each respective family, are recognised as good practice, and change is more likely to occur once mutual trust and respect is established.⁹ Access to adequate brokerage funds is also likely to be critical.

To this end, the Council **recommends** the state trial an in-reach home support program, co-designed to meet the identified needs of at-risk families and based on best practice in other jurisdictions.

This program should be linked to the whole-of-government Aboriginal community controlled organisation strategy with services delivered proportionate to need, and linked into existing support and referral networks via FSNs as appropriate. The Council welcomes the initial seed-funding to support the establishment of a Noongar Child Protection Council as an important first step towards the future development of a state-wide Aboriginal children and family services peak body. While we have welcomed the commitment to develop an ACCO strategy within child protection, we remain concerned that services have gone to tender before consultation and development of this strategy has taken place, and that the manner in which 'partnership' has been operationalised in recent tenders is not consistent with the partnership principles or the expectations of Aboriginal services. SNAICC and the Family Matters campaign have also called for renewed focus on proactive early intervention to support families,¹⁰ and there is a lot we can learn from best-practice in other states.

8 Tilbury, C (2015) *Moving to Prevention Research Report: Intensive family support for Aboriginal and Torres Strait Islander children*, School of Human Services and Social Work, Griffith University

9 Kamarang Services (2017) *Aboriginal In-home Support Service (AISS) Consultations Report*, Canning Vale, p 2

10 7th SNAICC National Conference Communique

FUND THE COORDINATION OF EARLY YEARS NETWORKS

Early Years Networks (EYNs) comprise, teachers, child care workers, nurses, allied health professionals, librarians, parents, caregivers and community members all passionate about the early years in the communities in which they live.

Over the last two years, a partnership between WACOSS, the former Department for Local Government and Communities, Lotterywest and the Woodside Development Fund has developed a pilot project called the Connecting Early Years Networks Support Project (CEYNSP) to trial a model of backbone-support to the 49 networks across WA.

Supporting and coordinating these networks has proven to add significant value both to the networks themselves, and more importantly to children and families in the communities in which they operate.¹¹ With six months of funding remaining, the pilot has demonstrated its effectiveness and the value of this approach, but the sustainability and effectiveness of many regional EYNs remains in doubt. More work needs to be done to address developmental vulnerability in regional and remote areas.

Department of Communities have agreed to provide some funding for staff and in kind support, co-locating the team at the Parenting Centre of Excellence. The project has also built a partnership with the newly established Co-Lab within the Telethon Kids Institute, where EYNs are able to play a critical role in ensuring evidence-based and informed practice is disseminated to practitioners in early childhood services.

The Council recommends longer term funding so the CEYNSP can assist networks to become sustainable, consolidate partnerships between the public and community sectors, and build the contribution both sectors play in improving outcomes for children and supporting in WA – at a cost of \$250k per annum.

11 WACOSS (2017) *CEYNSP Evaluation*

EXTERNAL CHILD PROTECTION OVERSIGHT

All children, including those in care deserve to be safe, treated with dignity and respect and be nurtured and grow to their full potential. Children in out-of-home care have often been the victims of significant abuse and neglect, and having love, care and support is critical to enabling them to overcome past trauma and prepare for a successful future. Unfortunately, some children also experience abuse and neglect while in care in WA, and urgent action is required to protect them.

In our last Pre-Budget Submission, the Council recommended the development of an external child protection oversight process and an independent child advocacy support service, comprising a mechanism for systemic oversight of standards and monitoring within out of home care, and an independent process for supporting children to come forward with complaints.

While there is still discussion across jurisdictions about the best way to tackle these two problems, there is strong agreement on the need to do so, and the key principles that need to underlie any effective approach.¹² Western Australia is lagging behind other jurisdictions in our systemic response, and we recommend an independent review of current internal complaints mechanisms.

The Royal Commission into Institutional Responses to Child Sexual Abuse identified that abuse in care is an ongoing problem¹³ and the 2015 Senate Inquiry into Out of Home Care recommended the Council of Australian Governments implement nationally consistent independent complaint and review mechanisms.¹⁴

Existing processes, including the Advocate for Children in Care and a Complaint Management Unit and the Office of the Western Australian Ombudsman, can be intimidating for children, particularly those with a background of trauma and little trust of authority. The Commissioner for Children and Young People in WA is specifically precluded from investigating or dealing with individual complaints from children.¹⁵

12 For instance the Everybody's Business report recommends both a reportable conduct scheme for children in care and an advocacy and support service for children who have been abused or neglected (not necessarily in the formal care system). *Everybody's Business: Joint Standing Committee on the Commissioner for Children and Young People*, Report no. 7, Parliament of Western Australia, June 2016

13 Royal Commission into Institutional Responses to Child Sexual Abuse (2014) *Interim Report: Volume 1*, Commonwealth of Australia

14 Senate Community Affairs References Committee (2015) *Inquiry into Out of Home Care*, Recommendation 6, 10.24 p xvii

15 Ibid. s23

CREATE Foundation identified that more than a quarter of children in care who wanted to make a complaint decided against doing so because of concerns about possible negative outcomes, and 10% were advised not to by another person. A further 10% were worried about the consequence of the complaint on others.¹⁶

Effective complaints handling is important. Not only does it help identify service deficiencies and provide for appropriate remedial action to occur, it can also act as an important mechanism to improve accountability and transparency in service delivery.

RECOMMENDATION: Develop an appropriately resourced independent child advocacy and support service for children experiencing abuse or neglect in care

YOUNG PEOPLE LEAVING CARE

The State urgently needs to extend the age of young people leaving the care system from 18 to 21 years. Although Western Australian legislation has a provision to support care leavers to access services beyond 18, these obligations are discretionary and limited to those that the CEO deems appropriate.

The Council fully supports the Home Stretch Campaign and CREATE Foundation, who have been at the forefront of advocating for this legislative change.¹⁷ This is an opportune time as it coincides with the current review of the Children and Community Services Act 2004. The Council **recommends** amending the legislation to extend the right to continuing care or support to 21 years.

The current legislation undermines the responsibility set out in the Convention on the Rights of a Child, under which the State is obligated to support young people transitioning from care and commencing their journey into adulthood. The current termination process fails to take into account the young person's circumstances and capacity, including their health, social supports, employment or education status. Leaving care at 18 years is out of step with current trends that see young people remaining at home until their mid-20s. Young people exiting state care at 18

¹⁶ McDowall, JJ (2013) *Experiencing Out-of-Home Care in Australia: The views of children and young people*, CREATE Foundation. Note the report does not include the views of children in WA. See also *Speaking Out About Raising Concerns in Care* (2016) joint report by CCYP, DCPFS and CREATE Foundation

¹⁷ <http://thehomestretch.org.au/>

subsequently have poorer outcomes and struggle with many of life's challenges. They are more likely to be unemployed or become a parent within the first 12 months of leaving, and they are also more likely to have ongoing interface with the welfare, criminal justice and mental health systems in the longer term.¹⁸

Australia is lagging behind recognised good practice in out of home care. The United Kingdom provides a more complete framework from which young people can be supported as they transition out of care. The local authority must provide the young person with 'continuing care', which constitutes the same or alternative accommodation and other supports as needed. In New Zealand, legislation was amended to extend the transition of leaving care to 21, and allows the young person to remain or return to living with the caregiver until this time.

It is estimated that more than 200 young people leave care in WA each year. A staged approach to delivering transitional support that assisted 30% of young people leaving care from 18-21 years at a similar level would cost \$2 million in its first year.

A cost-benefit analysis by Deloitte Access shows a \$2.17 return on every \$1 invested in intensive wrap-around intervention in Western Australia.¹⁹ Transitional support will lead to other savings in the system, including homelessness, hospitalisation and contact with the justice system.

A service framework must accompany amendments to the Act. It needs to be flexible and holistic and include targets of Aboriginal and Torres Strait Islander children in OOHC that are managed by ACCOs. WACOSS recommends establishing a panel to receive extended care submissions from case workers, other Departmental staff and the carers themselves, and that includes in-built reporting mechanisms to ensure the arrangement is working.

RECOMMENDATION: Transitional support for young people leaving state care \$2 million

¹⁸ Swinburne University (2015) *The Cost of Youth Homelessness*

¹⁹ Deloitte Access Economics (2016), *Raising our Children: Guiding our Young Victorians in Care into Adulthood*, Anglicare Victoria

RESPONDING TO FAMILY VIOLENCE

Western Australia's significant levels of domestic and family violence continue to undermine the health and wellbeing of our communities. WA has the second highest rate of reported physical and sexual violence perpetrated against women in Australia, second only to the Northern Territory. WA Police attended 59,408 domestic violence incidents in 2015/16, or equivalent to 147 incidents per day. This was nearly 11,000 or 15% more than the year before. Children were present in 22,182 cases and nineteen people lost their life as a result of domestic violence and 40% of all homelessness in WA is due to DFV.

WACOSS applauds the WA State Government's recently announced initiatives aimed at ensuring better alignment with the National Plan, signing onto Our Watch, legislative reforms to the nation-wide recognition of Violence Restraining Orders (VROs), and the Budget announcement of new cultural services and refuges. The designation of a Minister responsible for the prevention of violence against women is significant reform to progress high level, cross government leadership.

Further reforms and investments are still needed. We need a more cohesive system, coexisting and complementary programs oriented towards prevention and early intervention, as well as response. The importance of adequate and sustained funding to assist victims of domestic violence remains paramount. Holding perpetrators accountable is also crucial to victim's safety. Widening the remit of the Family and Domestic Violence Unit to become the Office for the Prevention of Violence Against Women and Their Children, located in the Department of Premier and Cabinet, will demonstrate that addressing DFV is a priority for this Government.

The state-wide Coordinated Response Service (CRS) triage model is currently over-subscribed in many regions. Further, there are a range of victim cohorts who are excluded from the CRS. The recent introduction of a three tiered threshold system means that some victims do not receive a response because risk is deemed low – where there are no children involved and there is no VRO or criminal charges pending – despite there being no investigation. Victims who do not have a Domestic Violence Incidence Response (DVIR) referral to the CRS are also excluded, with at best CRS team informally alerted to these victim's circumstances on an ad hoc basis. The presence of child protection and police personnel can act as another barrier for victims reluctant to become engaged in statutory systems because of earlier adverse or unhelpful experiences.

Funding is needed for case workers to support these groups in particular, in a flexible and mobile service model to uniquely tailor responses that enhance their safety, well-being and independence. Support must also be available in the longer term, after the crisis but while the survivor is still socially, emotionally and economically vulnerable. These supports can be attached to current DFV providers, including refuges, CRSs and counselling services.

Supporting children and young people who witness and are victims of DFV is imperative to breaking the cycle. A coordinated approach to supporting children and young people will entail both therapeutic and educational activities in their plan. It will also involve advocacy on their behalf when they are not well positioned to articulate their needs. Victoria has developed a practice guide to support workers assess the safety and needs of infants, children and young people affected by family violence and that could be adapted to WA.²⁰

Embedding the Respectful Relationship education program within school curriculum is a universal prevention strategy that will raise awareness that violence in families and intimate relationships is not acceptable and will not be tolerated.

RECOMMENDATION: Expand family violence outreach services and perpetrator accountability programs \$8.2 million

A CONSUMER ADVISORY GROUP

Consumers should be recruited and supported through local services and networks to act as a body that advises government about policy and service models. The Council recommends establishing a Family Violence Consumer Advocacy group. Funding of around \$200k per annum is required for backbone administrative support, member training and support, sitting fees and brokerage for catering and venue hire as needed.

IMPLEMENTING BEHAVIOUR CHANGE PROGRAMS

It is widely recognised that behaviour change programs that focus on making perpetrators accountable for their violence toward intimate partners and other family members are essential in promoting the safety of women and children. The service framework to support the recent amendments to the Act in WA, that now provide the Court with the discretion to refer Final Violence Restraining Order offenders to participate in mandatory behaviour change programs, is yet to be completed.

Funding is needed to finalise the design of the service model and commence the staged roll-out of mandatory court ordered men's behaviour change programs, beginning in nominated metropolitan and regional sites. To this end the Council **recommends** establishing a family violence perpetrator behaviour change program at a cost of \$1 million.

²⁰ <http://www.dhs.vic.gov.au/about-the-department/documents-and-resources/policies,-guidelines-and-legislation/assessing-children-and-young-people-experiencing-family-violence-practice-guide>

IMPROVE STATUTORY SUPPORT AND SECURITY

Security for victims attending court to apply for restraining orders urgently needs improving, especially for those who do not have legal representation. In some courts, victims end up sharing a waiting room with the perpetrator despite the option of a remote room. Many un-represented victims do not know about these rooms so do not request them. The room may not be available, court staff can be reluctant to arrange access, or access is often refused in urgent applications, because court staff claim there is not time to make arrangements.

Resources need to be allocated to increase the number of restraining order applications made by police. While police can apply for restraining orders on behalf of victims, they rarely do so in WA, unlike other jurisdictions where they are routine. The amount of information provided by police in Freedom of Information requested incident reports to allow DFV victims to complete effective Criminal Injury Compensation applications can also be improved. Incident reports are frequently redacted to the point where they provide little useful information, without due cause.

Better DFV training for police and more robust and effective DFV policies are needed. Transparency is needed to address inconsistencies in training and policy across different police stations. This includes dealing with breaches of restraining orders and whether victims are charged with offences arising out of self-defence. Equally, we need to ensure regular and appropriate training for the judiciary, court staff and the legal profession. The Council **recommends** improving statutory support and security at a cost of \$2 million.

A FASD INFORMED APPROACH

Fetal Alcohol Spectrum Disorder (FASD) is a diagnostic term for severe neurodevelopmental impairments (these may be difficulties with physical activities, language, memory, learning and behaviour) that result from brain damage caused by alcohol exposure before birth.²¹ Although the use of ‘fetal’ may imply that it only relates to babies, FASD has lifelong consequences that have a significant impact on behaviour and can be diagnosed at any age.

The prevalence of FASD has been established in only a few specific populations. The rates of FASD in Fitzroy Crossing (120 per 1000 children aged seven to nine) are the highest diagnosed in Australia and among the highest in the world.²² The WA Register for Developmental Anomalies recorded over twice the prevalence of FASD in 2000-10 than in 1980-89 for both Aboriginal and non-Aboriginal children.²³

The Telethon Kids Institute study found that 90% of the young people in Banksia Hill Detention Centre have at least one severe impairment in brain function. All of the young people in the cohort had been in contact with systems including; education, health, child protection and justice yet none of their impairments had previously been identified, recognised or diagnosed.

Positive outcomes can be achieved when early detection and diagnosis occur. The outcomes of a detailed assessment identifying strengths and difficulties informs specific and timely intervention, so that support services can be provided and parents are appropriately supported to understand their child’s behaviour.²⁴

It is vital that families, service providers, educators and other stakeholders are FASD informed and equipped, to ensure they are confident and resourced to respond, as well as develop supports according to each child’s presenting behaviours and strengths. It is critical that community-based approaches including early intervention and support across the lifespan are co-designed with local stakeholders and community leaders. Training is needed for police, education and health workers in recognizing and managing the impacts of FASD on behaviour and learning.

21 FASD Hub Australia – What is FASD?

22 Australian Institute of Health and Welfare, *Alcohol, Hurting People and Harming Communities*

23 Mutch RC, Watkins R, Bower C. *Fetal alcohol spectrum disorders: Notifications to the Western Australian Register of Developmental Anomalies*. J Paediatr Child Health, 2015; 51(4): 433-6

24 FASD Hub Australia – Managing FASD

A comprehensive FASD strategy should include:

- Co-design with key stakeholders
- Increasing specialist education assistants in primary schools
- Developing community education and awareness campaign
- Enhancing workforce capacity to understand and respond to FASD

The introduction of NDIS will enable many children and families to be eligible for support. However, it is a concern that a formal clinical diagnosis is required to prove eligibility and many children will miss out because of inadequate documentation, poor screening or assessment by assessors inadequately equipped to support families, particularly in regional and remote areas through the process.

The decision by the State Government to increase the number of Education Assistants in the school system is welcomed. It is vital, however, that both the number of Education Assistants and the training provided to them is adequate to meet the growing numbers of children entering the school system with FASD.

RECOMMENDATION: Co-design a whole-of-government FASD response strategy

Housing & Homelessness

For those able to access it, housing ranks among the biggest financial burden in their lives. Those without access find their ability to address other needs and get back onto their feet significantly hindered. Its absence compounds other problems, complicates access to entitlements and support and entrenches disadvantage.

This is why providing social housing is so important for addressing inequality and improving wellbeing. Western Australia needs a long-term and holistic strategy that links social housing to its transport, employment and sustainable development agendas. Doing so will make a significant impact on inequality and opportunity in our community, deliver a more liveable city and drive economic growth. We appreciate that access to new and additional resources is constrained in our current economic climate. This makes it all the more important to look for creative and joined-up approaches to better leverage the impact of existing investments, and to ensure the commitment made to major initiatives like METRONET is well-planned and directed to achieve maximum community benefit.

The Council **recommends** that the WA Government set longer term targets and aspirations for the provision of public and community housing that send a clear message about the kind of community it intends to build and the roadmap for building it, to provide direction and certainty that encourages strategic development and investment by the private and community sectors.

METRONET HUBS AS A DRIVER OF INCLUSIVE DEVELOPMENT

The METRONET project is a once-in-a-generation opportunity to radically reshape the relationship between transport and where people live, work and play. Western Australia must not let this opportunity go to waste by simply taking a business-as-usual approach to its development and failing to actively and responsibly plan this major project.

The Minister for Transport, Planning and Lands stated that “METRONET is as much a land use plan as a transport plan, and each project will be designed to marry the best transport outcomes with optimised land use outcomes.”²⁵

It is essential that those land-use outcomes include social housing and low-income affordable rental properties. Too often developments that include an affordability target take it to simply mean below market price, with the product remaining completely out-of-reach for those on the lowest incomes in our community.

Data has shown that low-income households are more likely to live in the outer and fringe areas of Perth, where rental and housing costs are lower, but access to jobs and services is constrained.²⁶ Many of those living in outer suburbs are in areas with little option other than driving, meaning transportation costs take a bigger bite out of the earnings of people on low incomes.

A 2016 survey on energy poverty in Western Australia, conducted by Bankwest Curtin Economics Centre found that those on low incomes:

*...were often forced to buy cheap, older, higher fuel consumption cars and might drive rather than walk in order to take advantage of lower priced food, for example, even when a closer (but more expensive option) existed.*²⁷

The cost of transport fuel was also found to have an impact on low-income earner’s job search and employment decisions, with nearly one quarter of respondents in the lowest income bracket indicating that concerns over the cost of getting to an interview had affected their decision whether or not to attend.²⁸ This is why providing social housing in areas in close proximity to employment opportunities, services and transport is crucial in driving inclusive economic growth.

METRONET provides significant opportunities to leverage social housing outcomes through the use of value capture and the inclusion of development targets and conditions. Studies of the Mandurah Line found that increased tax revenues over 30

²⁵ Saffioti MLA, Hon R (2017) *Specialist team to drive METRONET vision*

²⁶ Anglicare WA (2014) *Minimum wage earners living on the outer*

²⁷ Bankwest Curtin Economics Centre (2016) *Energy Poverty in Western Australia: A Comparative Analysis of Drivers and Effects*. BCEC Research Report No. 2/16, p 284

²⁸ Ibid

years resulting from the line amounted to 42% of the project's capital costs, but if land use planning had been fully integrated, tax revenues would have exceeded 60% of the capital costs.²⁹

The Council **recommends** that actively driving the planning and development process to ensure inclusive development and delivery of meaningful social and affordable housing outcomes should be the number one investment priority for this term of Government.

The government needs to establish a clear head of power for planning schemes to mandate social housing and low-income affordable rental targets, or to actively coordinate the changes through local government planning mechanisms. There are established mechanisms for securing housing targets around public infrastructure developments in other jurisdictions, and the State Government will be missing its most significant, if not only, opportunity to contribute to a more equitable society in this term of government if it fails to set and achieve targets around new and existing METRONET stations.

RECOMMENDATION: Set targets for social housing and low-income affordable rentals at METRONET Hubs

ENDING CHRONIC HOMELESSNESS

There are nearly 10,000 people experiencing homelessness in WA, with at least 600 of whom are experiencing 'chronic homelessness'.

Chronic homelessness is defined as an episode of homelessness lasting six months or longer or multiple episodes of homelessness over a 12-month period or more.³⁰ Many of these people will have had particular life circumstances that have pushed them into homelessness and stayed with them through it, or that they have developed because of or have been exacerbated by their homelessness – such as mental or physical ill health, family violence, contact with the justice system, and/or issues with alcohol and other drugs.

²⁹ Consult Australia (2015) *Value Capture Roadmap*

³⁰ Homelessness NSW *Chronic Homelessness*

The Housing First approach is based on the idea that it is by first rapidly providing access to permanent, stable and supported housing that it is possible to start addressing the other needs of those experiencing chronic homelessness.

The 50 Lives 50 Homes project is a collaborative initiative that takes a Housing First collective impact approach to providing long-term housing and support for 50 individuals and families identified as some of the most vulnerable rough sleepers in Perth. The project uses a model based around collaborative case management and housing allocation, collaborative working groups, a backbone support agency, and a dedicated after-hours support service that provides outreach workers and nurses, recognising that the issues people face do not fall neatly within a nine-to-five day.³¹

This kind of a model is essential to breaking the cycle of chronic homelessness, in which contact with police, prisons and hospitals so regularly form a part, and actually support people to improve their wellbeing and live the life that they want to live. By using a Housing First collective impact model, we can put an end to the experience of chronic homelessness in Western Australia.

RECOMMENDATION: Implement a housing first collective impact model to end chronic homelessness \$9.7 million per annum

STATE AFFORDABLE HOUSING STRATEGY 2030

The current State Affordable Housing Strategy reaches the end of its life in 2020, by which time 30,000 affordable homes will have been built over a 10-year period. The initial expectation of the strategy was that it would deliver 20,000 additional units of social and affordable housing for those most in need within our community. Instead the lack of clear targets for public and community housing, the widening definition of 'affordability' (leading to a focus on shared equity home ownership for those not facing exclusion from the housing market), and the hollow counting of 'new' units of housing during a time of net loss of public housing stock, took the shine off this commitment.

WA's strategy out to 2030 needs to be clearer and more ambitious.

³¹ Lisa Wood et al (2017) *50 Lives 50 Homes: A Housing First Response to Ending Homelessness*, Centre for Social Impact University of Western Australia

Where public money is being invested into housing assistance, our expectation of an equitable approach is for resources to be targeted to those most in need. Where cost-neutral shared-equity models can be demonstrated to provide opportunities for those on lower incomes, there may be reason to include them in the mix. To date, the Housing Authority has failed to provide evidence that it has not diverted its time and resources away from its core business of last resort provider for those excluded from market housing.

It is estimated that there are around 59,000 Western Australians unable to enter market housing and a further 73,000 requiring rent assistance to alleviate a position of rental stress.³² As of the end of 2016/17, there are 16,516 households on the public housing waitlist, with 1,590 on the priority waitlist.³³

On average, applicants waited 139 weeks to be housed (or around 2.7 years). This is a reduction of 14 weeks from 2015/16, which the Housing Authority identified as resulting from the Social Housing Investment Package. The package was a \$560 million direct investment, which delivered an additional 1,000 social homes, with a primary focus on housing seniors and families with children.

Though that one-off investment has seen them housed now, 33.52% of applicants housed in 2016/17 had a wait time of three or more years, with over half of that cohort waiting for five years or longer.³⁴ Further, the reductions in waitlist numbers in recent years are likely to have largely been a result of the tightening of waitlist criteria and further rationing of access to public housing.

We need to stop seeing the provision of social housing as just another cost to government and look at its relative contribution across the service system. A recent study found that the provision of public housing for National Partnership Agreement on Homelessness (NPAH) program participants was linked to a reduction in the proportion, frequency and duration of health service use. For the 3,400 individuals analysed in the study, this decrease potentially saved the Western Australian health care system a combined \$16.4 million a year or \$4,846 per person per year.³⁵

32 Rowley, S. Leishman, C. Baker, E. Bentley, R. and Lester, L (2017) 'Modelling housing need in Australia to 2025' Australian Housing and Urban Research Institute, *AHURI Final Report* 287

33 Housing Authority (2017) *Annual Report 2016-17*, p 53

34 Ibid. p 139

35 Wood, L. et al (2016) 'What are the health, social and economic benefits of providing public housing support to formerly homeless people?', *AHURI Final Report No 265*, Australian Housing and Urban Research Institute, p 2

A housing strategy that concentrates just on the ‘bricks-and-mortar’ is not enough. We need a flexible housing support system that provides the specialised services that are appropriate and safe for their situations, such as those who identify as LGBTIQ+, people with disabilities, those exiting prisons and people experiencing mental health issues.³⁶

A whole-of-government approach needs to be taken to provide the necessary wrap-around and recovery supports to secure and sustain housing for those at risk of homelessness. It needs to include a clear direction for community housing, including not-for-profit housing associations and cooperatives. Community housing is able to build strong partnerships with other support services and engage tenants in decision-making, providing flexible options that meet a diversity of needs. It also encourages innovation through joint ventures between public and private investors and charitable organisations with land.

The Council **recommends** that a whole-of-government approach to diverse housing needs be developed, including strategic direction and growth targets for community housing and supports to increase specialisation, innovation and investment.

RECOMMENDATION: Commence development of a new State Affordable Housing Strategy to deliver an additional 60,000 units of public and community housing by 2030 \$300 million per annum

REFORMING THE RESIDENTIAL TENANCIES ACT

We all know the saying ‘home is where the heart is.’ It is just as true for renters as it is for homeowners. People establish strong community ties, links to education and services, support networks and friendships around the place they call home. According to the most recent Census, 28% of Western Australians rent, meaning that those community ties can be torn apart on the whim of their landlord.

Section 64 of the Residential Tenancies Act enables the lessor to terminate a residential tenancy without specifying any grounds, so long as they provided at least 60 days’ notice.

³⁶ See for example the analysis of homelessness drivers in Gay and Lesbian Foundation of Australia ‘LGBTI Housing & Homelessness Projects’ (2017)

This provision places renters in a precarious and unjust position. Other jurisdictions have opted to secure a better balance between the rights of landlords against those of tenants that is more in keeping with community standards and expectations about our rights to be safe and secure at home. Tasmania's Residential Tenancy Act, for instance, does not allow for lessors to terminate tenancy agreements without reason, which is also the case for similar Acts in Ontario, Canada, and France. Renters deserve some assurance that, if they have not breached the terms of their lease agreement and that the lessor has not sold the property, their tenancy will not be terminated.

Consultations were undertaken last year on introducing domestic and family violence provisions into the Act. With domestic violence the leading cause of homelessness for women and children in Australia it is crucial that these reforms progress in a timely manner. Every other state and territory across Australia, and in New Zealand, has provisions addressing domestic violence in their Residential Tenancies Act.

These reforms need to include exclusion clauses for persons protected or bound by a Violence Restraining Order, enabling them to alter or terminate their interest in the tenancy, as well as hardships provisions to address circumstance where there is not a VRO. They should also introduce provisions around the disposal of the Bond, procedural protections in domestic violence tenancy applications, and provisions to facilitate changing of locks.

The Council **recommends** that the State Government reform the Residential Tenancies Act to abolish 'no-grounds terminations' and introduce family and domestic violence provisions.

PROPERTY TAXES AND STAMP DUTY

The Anglicare Rental Affordability Snapshot has repeatedly shown that affordable and appropriate rental properties remain out of reach for minimum-wage earning singles both with and without children and those relying on income support.³⁷

Despite rising vacancy rates and the decline in the median rental price, market forces alone are not pushing down rents at the bottom end of the market to a sufficient extent. When we, as a State, have so many properties sitting empty and yet housing remains unaffordable for a significant cohort of the population, it is clear that government action is needed.

The Victorian State Government recently announced the introduction of a vacant residential property tax in the inner and middle ring of Melbourne to reduce the high

³⁷ Anglicare Australia (2017) 'Rental Affordability Snapshot'

number of houses and apartments being left vacant. Levied at a rate of one per cent of the property's capital improved value, it is anticipated the tax will raise \$80 million over next four years.

The proposed Vacant Residential Property Tax will be levied on dwellings that are vacant for more than a total of six months in a calendar year, with exemptions for deceased estates, properties under renovation and those temporarily overseas.

The Council recommends the WA Government introduce a vacant residential property tax at a rate of one per cent of the property's capital improved value.

Stamp duty also has an adverse impact on housing affordability, as an upfront transaction cost paid upon purchase of a property, and can result in the underutilisation of housing as it discourages 'downsizing'. The ACT began the process of phasing out stamp duty over 20 years in 2012 through higher municipal rates, which are essentially a broad-based property tax.

By reforming WA's approach to land tax, the government could begin the process of phasing out stamp duty from the State's tax mix, both improving the efficiency of the tax system and increasing the revenue raising capacity of the tax base.³⁸ This reform would require the land tax base to be broadened to include owner-occupied housing. The exemption for owner-occupied housing is profoundly regressive, benefiting those in the top income quintile by almost \$2,000, and those in the lowest income quintile by only \$400.³⁹

A broad-based land tax model would provide a consistent and highly predictable source of revenue, unlike stamp duty returns which are both unpredictable and highly influenced by economic cycles. The new land tax model would need to include concessions, deferrals and exemptions for low income groups, in a manner not dissimilar to the current deferral arrangements for seniors paying council rates.

The Council **recommends** the gradual replacement of property based stamp duty with a broad-based progressive land tax over ten years, with exemptions, deferral and concessions for low income earners.

38 Australia's Future Tax System Review Panel (2010) *Australia's Future Tax System, Final Report*, Chapter C: Land and Resources Taxes, C2. Land Tax and Conveyance Stamp Duty. C2-4 Directions For Reform

39 Daley, J and Coats, B (2015) *Property Taxes*, Grattan Institute, p 16

TENANCY SUPPORT

Securing housing is not the end of a person's journey. In the absence of a system that supports people's needs, they can quickly find themselves struggling to maintain that tenancy they waited so long to access, potentially pushing them into further hardship and homelessness.

An Australian Institute of Health and Welfare study of people transitioning out of public housing in New South Wales and Western Australia found that tenants who lost their tenancy reported a greater need for mental health, psychological, drug and alcohol, gambling and legal/court support services. Of those who had lost their tenancy, 17% had lost it within three months of it commencing and a further 19% within three to six months. 47% of those who sought assistance from a specialist homelessness agency after exiting public housing were experiencing homelessness, demonstrating the significant risk of falling into homelessness for those who lose their public housing.⁴⁰

This is why it is so essential that the supports needed are available from point of first contact to beyond the point where a tenant may be transitioning out of social housing.

Community housing organisations conduct a full assessment of tenancy history, risk factors and support needs at the point of application. This enables early intervention for those who need support with their tenancies, improving outcomes for the tenant and reducing costs longer term.

The Housing Authority should partner with the community housing and support services sectors to develop a shared assessment framework and joint waitlist that could be used to determine at the beginning who are the tenants for whom the public housing system and its current level of support is appropriate and effective. For those for whom that level of support is insufficient, a targeted and integrated housing support system, co-designed with the community sector, would enable the provision of the intensive and specialist support they may require to transition into and maintain their tenancy.

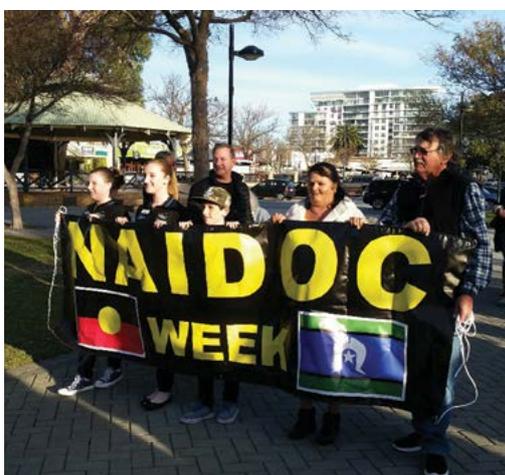
An example of this model in practice can be seen with the Tasmanian Government's Housing Connect.⁴¹ It functions as a one-stop shop for all housing and homelessness assistance and support needs. A core component to the success of Housing Connect is a common assessment framework and shared database.

⁴⁰ Australian Institute of Health and Welfare (2015) *Exploring transitions between homelessness and public housing: 1 July 2011 to 30 June 2013*

⁴¹ Housing Tasmania, 'Housing Connect'

A recent survey conducted with current specialist homelessness service providers and department district offices found strong support for a standardised assessment framework to match services with clients, as well as support for a coordinated and integrated response approach with lead agencies providing a coordination and facilitation role.⁴²

RECOMMENDATION: Co-design of a shared assessment framework and tenancy support system with the community housing and service sectors \$15 million



MANDURAH/PEEL

With a current population of approximately 420,000 the Peel region is sizeable. Some government departments classify Peel as part of the metropolitan area and others deem it part of regional WA. Mandurah is the Peel's centre and the contrast between haves and have-nots is stark here. The population in Mandurah is ageing, with the highest proportion of people over 65 years compared to anywhere else in the state. The region is predicted to continue to be one

of the fastest growing in Australia. Many local stakeholders report that community support and other amenities have already failed to keep up with an expanding population and services are generally stretched.

Mandurah is widely known as a homelessness hub and homelessness is now spreading inland, especially in the holiday season. The region has been impacted by the economic down turn, recording high rates of unemployment and under-employment. Ex FIFO workers and young people have been particularly impacted by this. Mandurah is the nominated location for some initiatives announced in the 2017/18 State Budget including a youth health hub and a DFV support service. It is also one of the sites that the Commonwealth has selected for the drug testing of new welfare recipients. Effective interagency relationships and goodwill have translated into a greater degree of flexibility in service delivery and a 'no wrong door' approach across the sector.

⁴² Non-Government Policy and Funding Division (2016) *Survey on Homelessness Service Provision, Department for Child Protection and Family Support*, p 5

Justice

The current 'tough on crime' approach is categorically failing to make Western Australian communities safer. The continuous and inter-generational cycle of imprisonment is utterly unsustainable and is overburdening our courts and prisons. Our focus instead needs to be on strengthening families and communities, and supporting those returning from prison. Western Australia should follow the holistic, evidence-based approach of Social Reinvestment – based on the three complementary pillars of healthy families, smart justice and safe communities.⁴³

Justice reinvestment is a keystone of this approach, where money that would be spent on building more prisons and justice services in the future is invested into community-based diversion and rehabilitation programs to reduce the need for them in the first place.

While the Government's Justice Pipeline Model will forecast and simulate demand pressures in the system and Target 120 will provide a more holistic approach to the families of prolific offenders, WA needs a cross-government strategy that includes specific justice targets to reduce the over-representation of Aboriginal people in our criminal justice system. These targets should include an imprisonment ratio that better reflects their population level and link closely to strategies to reduce rates of family violence and the over-representation in out-of-home care.

RECOMMENDATION: Develop a Social Reinvestment strategy focused on diversion, rehabilitation and community-based early intervention, including clear justice targets

REDUCING INCARCERATION

In Western Australia, around 40% of adult prisoners and three quarters of young people in custody are Aboriginal. As stated by Associate Professor Hilde Tubex, “a system can’t be fair or just if the marginalised and vulnerable are the first to be affected by it.”⁴⁴ This is the outcome created by our state’s mandatory sentencing regime – Aboriginal people, young people, people with disabilities and those living in poverty are disproportionately impacted by ‘three-strike’ laws.

Any serious effort to address the overrepresentation of Aboriginal people in our justice system must start with the repeal of mandatory sentencing. The system runs contrary to our international human rights obligations including the prohibition against arbitrary detention, the right to a fair trial and the rights of children.⁴⁵ The WA Commissioner for Children and Young People said “...it is clear that to the extent that mandatory sentencing regimes are applicable to children they do not have the best interest of the child as a priority.”⁴⁶

Removing sentencing decisions from the hands of our judiciary means adults and children face disproportionate and arbitrary sentencing outcomes that do not take into account their circumstances or the nature of their actions. Instead we are forcing people, such as repeat low-level offenders, into our over-stretched and crowded prisons.

The Council **recommends** the immediate repeal of mandatory sentencing legislation. The discriminatory impact of WA’s sentencing system can also be seen in our state’s approach to fine defaulters, with Aboriginal women the most likely cohort to be in prison for fine default.⁴⁷ The need for urgent action on this front was made clear by the case of Ms Dhu, who died in police custody following her arrest for unpaid fines. The 2008 amendments to the Fines, Penalties and Infringement Notices Enforcement Act 1994 enabled fine defaulters to serve multiple sentences for fine defaults concurrently, enabling them to only serve the time needed to pay off their largest fine (at a rate of \$250 per day). However, amendments were not made to enable fines

⁴⁴ Tubex, H (2016) ‘Mandatory sentencing leads to unjust, unfair outcomes – it doesn’t make us safe’, *The Conversation*

⁴⁵ Mandatory sentencing can result in sentences disproportionate to the severity of the crime committed, resulting in ‘arbitrary detention’ per *A v Australia*. Mandatory sentences also prevent substantial review of the penalty received, restricting the requirements of the fair trial principle. Law Council of Australia (2014) *Policy Discussion Paper on Mandatory Sentencing*

⁴⁶ Pettit, C (2017) *Australian Law Reform Commission Inquiry into Incarceration Rates of Aboriginal and Torres Strait Islander Peoples*, Commissioner for Children and Young People Western Australia, p 9

⁴⁷ Office of the Inspector of Custodial Services (2016) *Fine Defaulters in the Western Australian prison system*

to be worked off concurrently through community work, creating a perverse incentive for people with multiple fines to go to prison. The Act needs to be reformed to enable Work Development Orders to be undertaken concurrently.

The WA Government also needs to implement programs designed to reduce fine default imprisonment. New South Wales, Queensland and Victoria have seen success with recent initiatives, including the Work and Development Order Service,⁴⁸ a free legal service that helps people in financial hardship work off their fine debt, and the State Penalty Enforcement Registry, which encourages the use of other enforcement mechanisms.⁴⁹

Considering the economic and social impact of imprisoning fine defaulters, the Council recommends that the WA Government improve alternative options to imprisonment for fine-defaulters to reduce incarceration rates.

CRIMINAL LAW (MENTALLY IMPAIRED ACCUSED) ACT

Under the Criminal Law (Mentally Impaired Accused) Act 1996 (CLMIA Act), ‘mental impairment’ means intellectual disability, mental illness, brain damage or senility.⁵⁰ Those deemed by a court to be ‘mentally impaired accused’ can thus find themselves detained indefinitely without trial, for periods far in excess of the maximum sentence of the offence of which they were accused.

The Council reiterates its calls for reforms to the CLMIA Act in order to end the indefinite detention of those “deemed not mentally fit to stand trial for an offence... because of mental impairment.”⁵¹

As a result of the CLMIA Act, Marlon Noble spent 10 years imprisoned without being convicted of a crime. The UN Committee on the Convention on the Rights of Persons with Disabilities rightly concluded that his indefinite detention “amounted to inhuman and degrading treatment” and that the WA Government has an obligation to change the Act.

To prevent such grave breaches of human rights, reforms to the Act must include restricting custody orders to be no longer than the term the person would have likely received should they have been found guilty of the offence; the introduction of a special hearing to test the evidence against the accused; and providing the judiciary

48 Legal Aid NSW (2016) ‘Work and Development Order Service’

49 State Penalties Enforcement Registry (2017) ‘About us’

50 Ibid. s8

51 *Criminal Law (Mentally Impaired Accused) Act 1996*, s9

with the discretion to impose a range of options through introducing community-based orders for mentally impaired accused.

The participation of those with lived experience of mental ill health, as well as their support networks, is essential for the reform process to target the provisions that are of most concern and to determine alternatives that are to the benefit of all.

It is crucial that the Disability Justice Centre, whose residents have been deemed by a court to be ‘mentally impaired accused,’ remains community-based. Though a 2016 independent review found that the Bennett Brook Centre is striking “proper balance between prioritising the protection and safety of the community, staff and residents while at the same time delivering appropriate services to Centre residents,”⁵² the new Government has commissioned yet another review into the centre.⁵³

The government must commit to continuing to provide them with a safe and supervised community-based residential service with the appropriate supports to assist them in returning to the community. It would be a violation of the rights of the residents for them to be placed in prison, as they have never been convicted of a crime.

The Council **recommends** that the Government end the indefinite detention of mentally impaired accused by reforming The Criminal Law (Mentally Impaired Accused) Act 1996.

THERAPEUTIC SERVICES IN JUSTICE SYSTEM

Everyone should have access to mental health, alcohol and other drug treatment and support services, no matter where they are in the community or the justice system. The evidence supports the delivery of therapeutic services in prison programs by community service organisations, who are also better positioned to continue treatment and support beyond release.⁵⁴ Expansion of a therapeutic communities model (promoting self-help and mutual support) into WA prisons would have a positive influence on prisoner behaviour and reoffending.

The 2017/18 State Budget set out funding to create a fit-for-purpose drug and alcohol rehabilitation prison at Wandoo, with a rehabilitation model that will include

52 Blaxell, Hon P and Hayward AM, C (2016) *Bennett Brook Disability Justice Centre, Independent Analysis of Individual Plans, Programmes and Services for Residents*

53 Dawson MLC, Hon S (2017) ‘Disability Justice Centre to undergo review’

54 Mental Health Commission (2015) *Better Choices Better Lives Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025*, p 40

comprehensive alcohol and other drug rehabilitation services to be developed by the Department of Justice. Similar facilities for men should also be established. We recommend the Mental Health Commission is involved in the development of the rehabilitation model and any procurement processes for services, the use of a recovery model, and establishing similar facilities for men.

Therapeutic services should not be limited to ‘specialist’ prisons alone, however, and should be available to anyone incarcerated in Western Australia, including the provision of in-prison community treatment services and subacute beds. An increased focus on therapeutic and diversionary processes throughout the court system is also needed, including the Drug Court and Start Court. The principles of enhancing wellbeing and reducing contact with the criminal justice system must be our focus to achieve the best outcomes for our community.

RECOMMENDATION: Increase availability and effectiveness of therapeutic services in the justice system, including needs assessment, data sharing and through-care \$10 million

BANKSIA HILL DETENTION CENTRE

The state has a profound obligation towards the young people it has incarcerated to enable them to develop and successfully transition back into the community.

The Council agrees with the Inspector of Custodial Services that the introduction of a trauma-informed and individualised approach to behaviour management at the Banksia Hill Detention Centre was an indication of great progress in WA’s approach to youth custodial services. We are, however, very concerned by the findings of the Inspector that the implementation of the behaviour management practices have been inconsistent and ineffective at Banksia Hill, which he describes as “the most complex and challenging custodial facility in the State.”⁵⁵

We strongly support the recommendations made by the Inspector to address these issues, including investigating opportunities for small residential youth facilities across Western Australia to keep young people close to their families and networks, and to increase the prospects of successful rehabilitation; improving consistency in the way young people are managed; and continuing to pursue a trauma informed model.

⁵⁵ Office of the Inspector of Custodial Services (2017) *Behaviour management practices at Banksia Hill Detention Centre*, p ii

RECOMMENDATION: Implement the recommendations of the 2017 OICS Banksia Hill behaviour management practices review

TRANSLATION SERVICES

Providing equal access to justice is a cornerstone of any free and fair society. As language can act as a significant barrier to justice, interpreter services need to be provided throughout the justice system, especially in police interviews and in courts. Just this year the Court of Appeal unanimously found that a miscarriage of justice had occurred in the case of Gene Gibson, with his having entered a plea without an understanding of the case against him or the advice he had received due to English language difficulties and cognitive abilities.⁵⁶

The not-for-profit Kimberley Interpreting Service (KIS) is currently the only Indigenous language interpreting service in the entirety of Western Australia and survives on limited funding from the Commonwealth, restricting the accessibility and availability of these services. The \$200,000 granted to KIS to support interpretation and translation services for Aboriginal people in the 2017/18 State Budget is insufficient to provide a systemic approach.

To create the necessary level of oversight and ability to meet demand, the Equal Opportunity Commission proposed establishing a Language Services Unit and regionally based coordinating bodies, including the KIS. The justice system is not the only place where these interpreting services are needed, with the health system another significant area in which they need to be provided.

RECOMMENDATION: Improve access to interpreter services, including funding a state-wide Aboriginal interpreter service \$2.4 million

COMMUNITY LEGAL CENTRES

Affordability also makes it difficult for many people to access justice. Community legal centres are essential to ensuring access for those otherwise unable to afford legal assistance. However, the ability of the community legal centres to meet the

⁵⁶ Gibson v The State of Western Australia [2017] WASCA 141

demand for their services is reduced by piecemeal and uncertain funding, forcing them to waste time continually applying for grants and seek funding from a variety of sources.

The level of funding that community legal centres may receive is often difficult to predict, placing significant pressure on the management of centres and their sustainability. Centres are funded through a mix of Commonwealth funding, Legal Aid WA, the Public Purposes Trust and the Legal Contributions Trust.

The WA Government has a commitment to transparency in decision-making, including the sharing of data and information, the basis for funding decisions and contracting requirements under the DCSP policy. The decision by Legal Aid WA not to apply the DCSP policy, places community legal centres at a profound disadvantage and needs to be reviewed.

The WA Attorney General should also seek opportunities to consolidate the existing sources of funding and any new sources into a single, transparent stream where possible. This would reduce the burden currently placed on community legal centres and provide them with greater certainty.

RECOMMENDATION: Consolidate any new and existing community legal service funding streams into a single, transparent program which procures services under the DCSP policy

STOLEN WAGES

Western Australia has still not fully come to terms with our history of what essentially amounted to the slavery of Aboriginal people through what is referred to as 'stolen wages'.

Until 1972, the WA government was able to hold up to 75 per cent of an Aboriginal person's wages, and these monies were often not returned to them and used instead to subsidise departmental activities. Government policies of the day also saw many Aboriginal people pushed off their land and forced to work on stations for food and clothing rations.

The previous government's Stolen Wages Reparation Scheme was inadequate to the point of being shameful. Based on actuarial advice, the WA Department of Indigenous Affairs had recommended an ex-gratia Common Experience payment of \$10,000, with the potential increase of an extra \$5,000 as additional monetary compensation to acknowledge the personal and family impacts beyond the

actuarial calculation.⁵⁷ Despite this, the Government's scheme ended up offering a limited number of people a maximum of \$2,000 each.

As stated by Dennis Eggington, CEO of the Aboriginal Legal Service of Western Australia, "the significant legacy these people left this state was paid for in blood, sweat and tears and to have this measured so meagrely is heart breaking to those who have survived and insulting to the families of those who didn't."⁵⁸

In this context, the new State government should review the Stolen Wages Reparation Scheme, and seek to co-design a more comprehensive response with Aboriginal people to ensure it is just and adequate, and provides opportunities for their stories to be collected and recognised.

RECOMMENDATION: Review the WA Stolen Wages Reparation Scheme to deliver a more comprehensive response that is co-designed with those affected

HISTORICAL CHILD SEXUAL ABUSE REDRESS

The WA Attorney-General stated that one of his first priorities would be to introduce legislation into the Western Australian Parliament to amend the State's Statute of Limitations as it affects victims of historical child sexual abuse. This change in legislation is important as it will mean institutions will no longer be able to avoid claims that are out-of-time and victims will not have to spend time and money arguing for the right to have an out-of-time court matter heard.

The Australian Government committed \$33.4 million in the 2017-18 budget to establish a Commonwealth Redress Scheme for survivors of institutional child sexual abuse. Subject to the passage of legislation, the Scheme will commence in 2018 and will be available for survivors of child sexual abuse in Commonwealth institutional settings.⁵⁹ If the states refer sufficient powers to the Commonwealth, and State based churches, charitable and other community institutions also 'opt in'

57 Department of Indigenous Affairs, Western Australia (2012) 'Briefing note the Minister for Indigenous Affairs on the actuarial advice of the Stolen Wages Taskforce'

58 Aboriginal Legal Service of Western Australia (2012) 'Stolen Wages offer a 'slap in the face' says ALSWA'

59 Commonwealth Redress Scheme for survivors of institutional sexual abuse

to the National Redress Scheme, survivors who were sexually abused as children in those institutions will be eligible to claim redress.

Although the Scheme will take account previous ex-gratia payments in the State Scheme, there will still be a financial cost to the WA Government if it joins the National Scheme. Many people who have come forward to the Royal Commission did not claim under the State Scheme. Federal and state governments will act as 'funders of last resort' where organisations have closed or been bankrupted.

There would be enormous public distress if survivors of institutional child sexual abuse in Western Australia were ineligible to claim for redress because the State government had not opted in. A great deal of anxiety was created by public misunderstanding of the State-based Redress Scheme announcements, so it is critical that WA ensure clear and unambiguous information about the National Redress Scheme is disseminated widely.

RECOMMENDATION: Extend statute of limitations on child abuse and sign up to the national redress scheme

KATANNING/GREAT SOUTHERN



Katanning is a regional centre located in the Great Southern Inland area, and the base for services delivered to smaller surrounding towns. There is a high proportion of Aboriginal people who live in the Great Southern, and Katanning is a central place for local Noongar people. Although Katanning is regarded as one of the most productive agricultural regions

in the state, the town's social and economic fortunes have fluctuated. Katanning's current lower SEIFA score reflects that it is generally a disadvantaged centre. There is a disproportionate exodus of young people leaving Katanning to pursue higher education and employment opportunities not available locally. Access to local education, training and career pathways is therefore a high priority for the region. Aboriginal people are especially vulnerable to unemployment in Katanning. Although Katanning is renowned for its multicultural population, there is a lack of local migrant settlement services. The town's higher rates of male youth suicide and DFV are also identified as urgent issues. Local providers are strong advocates of extending the leaving care age to 21 years with many Aboriginal children and young people in out of home care moving into homelessness when exiting the child protection system.

Sustainable Services

It is predicted that the health and social services workforce will triple by 2030. Despite this, there is currently no workforce development strategy to ensure we have the capable and caring skilled workforce our community will need.

Modelling projections by the State Training Board Workforce show faster than average employment growth for the health care and social assistance industry, reflecting population ageing and growing need.⁶⁰ Nationally, the not-for-profit sector is expanding faster than the Australian economy, growing at 3.2% per annum against GDP growth of 2.9%. In 2014, the Commonwealth Department of Employment estimated that Australia will need an additional 230,000 social care and support workers over the next five years.⁶¹

Developing and sustaining a skilled community services workforce to meet projected need is becoming an increasing challenge, given a tightening funding environment and a shift to individualised service payment models. While individualised funding provides one mechanism to increase consumer choice and control, it is important we get the balance right between choice, cost and quality in how services are regulated. The down-side can be an increasing 'uber-isation' of support service roles, leading to uncertain work hours and precarious employment that hollows out workforce skills and increases the risk to consumers. Many existing small to medium service providers lack access to the necessary capital to transition easily from an up-front grant funding model to individualised payments in arrears, threatening the diversity and accessibility of services in the short to medium term. At the same time, the shift to more collaborative cross-disciplinary wrap-around service delivery models and the imperative to reduce the growing cost of tertiary services means there is a pressing need to address skills gaps and workforce capability across a number of service areas. Market mechanisms can play a constructive role in service system planning, but we need to be cautious about their implications and potential unintended consequences for service quality, risk and sustainability.

60 State Training Board (2017) *State Training Plan 2017–2020*

61 Department of Employment (2014) *Industry Employment Predictions, Australian Government*

Western Australian charities employ 7% of the WA workforce. This is more than 93,000 staff – 47,000 full-time and 46,000 part-time. By way of comparison, the manufacturing sector employs 98,900 or 7.2%, mining employs 112,100, or just over 8.0% and the agriculture, forestry and fishing sector only 31,200, or 2.2%. As such, the not-for-profit sector is a significant (and fast growing) driver of economic activity in WA.

WA charities generated \$14.1bn of income in 2014 and spent \$13bn on expenses, with 59% of that income self-generated through donations, fees for service, social enterprises or return on investments. More than half (58%) of the expenditure by WA charities (\$6.68bn) was spent on employee wages. These wages are generally recycled quickly into the local economy, creating a multiplier effect. Staff on lower average salaries tend to spend a higher proportion of their salaries on daily living expenses.

The WA State Training Board has called for a comprehensive workforce development plan for the healthcare and social assistance industry involving industry, care providers, allied health and advocacy and advisory bodies.⁶² This is essential to ensuring our workforce is able to meet current and future demand.

The Victorian Government recently committed half a million dollars⁶³ to help establish a new research and teaching organisation, the Future Social Service Institute⁶⁴ to transform the social support and care sector into an economic powerhouse by recasting it as a strong industry with professional career paths. This will involve the rollout of new qualifications, initially at the vocational level, that will attract the best high school graduates. If we get this right, WA's brightest students will increasingly look to social support and care as their first career choice.

RECOMMENDATION: Develop a community services workforce development strategy to meet future demand for caring and capable workers

⁶² State Training Board (2017)

⁶³ Foley MP, M (2016) *More Support to Grow World Class Disability and Aged Care Workforce*

⁶⁴ Future Social Service Institute (2017) <http://www.futuresocial.org/>

ABORIGINAL WORKFORCE DEVELOPMENT

The gap in economic participation and life outcomes for Aboriginal people in Western Australia remains significant. This is in part a legacy of the impacts of past policies and practices, part a consequence of health, education and support service systems that are inappropriate or inadequate to meet levels of need, and part simply a consequence of poverty and lack of opportunity. Fear and lack of trust also play a critical role in lower rates of access to universal and secondary support services, particularly when it comes to justice and child protection services that many families associate with former stolen generation practices.

There is a strong argument for a greater focus on Aboriginal employment in health, education and community services. Given the projected growth of the service and caring economy, and disproportionately high levels of need for services and support by Aboriginal families and communities, the development of a human services workforce also offers an excellent opportunity for increasing economic participation, helping develop more sustainable and resilient local economies.

A planned and sustained strategy is needed to provide a coordinated approach supporting a skilled Aboriginal human services workforce, and build sustainable Aboriginal organisations and businesses by setting clear employment and training targets.

A combination of contracting requirements, additional incentives, and training support is likely to deliver the most effective outcomes. Contracts over a certain size should include minimum employment and training requirements, additional resources made available to leverage increased employment outcomes, and access to targeted support to ensure Aboriginal workers are work-ready, have access to additional training where necessary and their supervisors and co-workers have access to appropriate information and assistance.

There is a significant risk that a strategy that does not address these gaps and challenges would be setting up Aboriginal people, communities and community services to fail. Mission-driven organisations may be willing and motivated to employ and train local Aboriginal workers, but many smaller, regional and specialist providers may lack the capacity and resources to do so effectively. There is a clear role for government to commission employment services at a local or regional level to provide appropriate support. Existing Aboriginal organisations may be best placed to deliver this support, and the Aboriginal community-controlled health sector has a strong record of outcomes in this area.

RECOMMENDATION: Develop an Aboriginal workforce development strategy that provides incentives and support to increase Aboriginal employment in human services contracts

ABORIGINAL COMMUNITY-CONTROLLED ORGANISATIONS STRATEGY

While increasing Aboriginal employment in mainstream services is necessary to ensure they are more accessible and appropriate for Aboriginal clients, much stronger gains are likely to be made in delivering responsive services that achieve transformative and sustainable outcomes in service areas with a high proportion of Aboriginal clients by increasing the role of the Aboriginal community-controlled organisations (ACCOs).

Aboriginal community-controlled services already deliver a larger and increasing proportion of community services in other jurisdictions, particularly in service areas where there are a significant proportion of Aboriginal service users. This includes child safety and intensive family support; out of home care and family reunification; justice diversion and youth at risk services; mental health, alcohol and other drug services; health, education and aged care.

There is a strong and well-established Aboriginal community-controlled health services sector (ACCHSs) in WA that has the capacity, the community reputation and trust, and the local governance structures to play a critical role in establishing or supporting community services. While partnerships with mainstream community service providers based on the national partnership principles⁶⁵ provide one mechanism for establishing and building the capacity, ACCHSs may be better able to establish local Aboriginal community services more quickly and sustainably, as they have established local infrastructure, and experience in training and supporting an Aboriginal workforce. There may also be emergent opportunities for service co-location and cross-referral as well as the sharing of back of office and governance structures.

In addition to supporting and encouraging the development of Aboriginal workers, larger community service programs and initiatives should also include provisions

65 Principles for a Partnership-centred approach. WACOSS promotes these principles to its members and has previously recommend the WA Government develop matching principles for ensuring service contracts recognize and support partnerships that transfer responsibility and control to ACCOs

and resources to enable the development of local community-controlled services as part of a whole of government ACCO strategy. We note that there has been a trend in human services towards fewer contracts with larger organisations, which is assumed to reduce the administrative burden of contract management within government, reduce duplication between service providers, and improve service efficiency. This trend, however, works against the interests of smaller local services and place-based strategies, potentially making it difficult to develop a local workforce, or increase service user engagement and trust. An alternative model is to have ACCHSs or mainstream services auspice local services, providing transitional backbone support or oversight in finance, governance, service reporting and HR. Service contracts need to be able to support the transfer of responsibility and control over time and tendering and commissioning processes need to both allow sufficient time for the development of such arrangements, be sensitive to and include provisions that support partnerships and transfer of control, and use local knowledge to ground-truth claims of local engagement.

RECOMMENDATION: Develop a whole of government strategy to increase the role of Aboriginal community-controlled services to deliver services proportionate to population need

“The goal for us all must be a system that is child focused, community involved, evidence based, locally tailored and providing support for children and families as early possible.

The sector is fatigued from reform, tired of ad hoc trials, poorly served by underfunded and incomplete programs, losing talent and experience due to short term contracts and delivered a disservice by constant political scapegoating. This committee, indeed all of Parliament, needs to not only make recommendations but see that they are implemented, properly funded and given time to work. In the modern political cycle, and especially given the highly emotive subject matter of child protection, this is a challenge that most governments and parliaments have failed in the past. We need to do better.

An approach that is appropriately child centred for children and young people, who at this critical time of their development, including their brain development, are not mini adults and should not be treated as such. The emphasis on early intervention and early support will be the cornerstone of our recommendations.”

Mick Gooda: Speech to the NT Council of Social Service. 26th September 2017 for the Royal Commission into the Protection and Detention of Children in the Northern Territory.

EQUAL REMUNERATION ORDER

The implementation of the Delivering Community Services in Partnership (DCSP) policy was intended to shift commissioning processes to outcome-based contracts, based on either tendering on the cost and quality of a fixed level of service delivery, where outcomes are specified, or tendering the level and quality of service delivered for a fixed cost. However, the extent to which we are actually seeing community service providers tendering the ‘true cost’ of service delivery remains debatable, particularly where existing services are being re-tendered with fixed costs and departmental expectations about ongoing service models and levels are strongly implied. Problems have arisen in particular where small to medium service providers in particular have lacked the knowledge and tools to be able to sustainably price longer term contracts in a changing funding environment.

This is particularly true of the ability of services to cost in increasing award wage obligations during a period where the NGHSS indexation formula has changed, and rates of indexation have dramatically diverged from award wage increases. In 2012, the Fair Work Commission issued an Equal Remuneration Order (ERO) requiring human services agencies to pay annual increases of between 23% and 45% over eight years (to 2020). Consequently, annual pay rises are between 5% and 6%, whereas indexation had dropped below 2%. With over 400 organisations providing contract services to WA Government agencies, this presents a significant impact on the sustainability of organisations, services or programs.

Research by the Curtin Not-for-profit Initiative in 2016/17 on 19 major WA not-for-profit agencies commissioned by Lotterywest found a negative financial impact on all organisations covered by the relevant awards, with the scale of the impact varying depending on whether agencies were already paying over award rates. Six of the 19 agencies reported reduced profitability or were no longer profitable in the short term and five expected a high impact, with that number rising to seven and eight respectively in the long term. Four agencies expected to become unprofitable directly as a result of the ERO. Eight organisations that were either unprofitable before the ERO or became unprofitable as a result of the ERO, deploy 182 programs which were impacted negatively by 10% or more as a consequence.⁶⁶

WACOSS remains concerned that the growing gap between reduced indexation rates for service funding and scheduled award wage increases under the ERO will inevitably lead to reductions in service delivery levels and/or service quality, and is likely to threaten the ongoing financial viability of some small to medium community

⁶⁶ Gilchrist, D and Knight, P (2017) *The 2012 Equal Remuneration Order: Sustainability Impacts on Human Services Delivery in Western Australia*

organisations delivering essential community services. This problem is particularly acute for wage-intensive 24/7 and after-hours services, such as women's refuges and homeless services. While contract renewal processes will provide services with the opportunity to re-price their services to meet the true cost of service delivery over time, there is a need for an interim strategy to allow services with legitimate sustainability challenges to seek transitional top-up support and/or renegotiate service levels.

The public and community sectors face a shared challenge in how we meet our aspirations to both deliver efficient and effective services to those most in need and provide fair and just wages during tight economic times.

RECOMMENDATION: Provide transitional top-up funding to essential after hours services affected by the gap between the Equal Remuneration Order and reduced NGHSS indexation

MENTAL HEALTH

Increasing investment in prevention and early intervention to reduce the incidence of more severe mental health problems, suicide and self-harm is crucial to delivering more sustainable and affordable mental health services. Though it is commendable that the State Government has funded pre-election promises in mental health, the Council is concerned this funding is not well-aligned with the balance of investment envisaged in the Better Choices Better Lives Ten Year Mental Health, Alcohol and Other Drugs Service Plan 2015 – 2025.

With forward estimates showing a steady increase in funding for hospital bed-based treatment services over time, funding for community support services and investment in prevention is stagnant, meaning our mental health system will remain out of balance. The community mental health sector, consumers and families support the intent of the Plan as a roadmap for this reform. The Council recommends that the government focus on its principles and intent, and align its efforts with the agreed priorities. This includes increasing community support services to 3.2 million hours from the 842,000 hours provided in 2015-16 that met only 20% of demand. The under-investment of community support services contributes to increased health system costs through higher rates of emergency admissions and acute service readmissions in the longer term.

The Council is concerned that the state government may be relying on NDIS to provide this support into the future. The problem is that only a small proportion of people with mental health issues who require community support will be eligible

for NDIS funded supports, so regardless of NDIS funding contribution to WA, glaring gaps in community support will remain. The predicted significant shortfall in services for ineligible consumers means that investment in community-based recovery must be a priority. This deficit will become more apparent in 2019/20 when the roll out of NDIS is complete, and the Council urges the Government to begin planning for this now, in collaboration with the Commonwealth.

The Council strongly supports the forecast in the Plan and recommends that 4% of the mental health budget should be spent on prevention by 2020. Instead of increasing, however, forward estimates show that the proportion of MHC budget spent on prevention is actually decreasing from 2.49% in 2015-16 to just 1.23% in 2020-21. An urgent increase in early intervention funding is needed to reduce the human, social and financial costs of mental ill-health.

Suicide prevention is an important priority, as suicide is now the leading cause of death for children aged 5-17 and for 15-44 year olds. People with mental health issues are at particularly high risk. Suicide rates in Western Australia are increasing, with the rates for Aboriginal people in the Kimberley and Goldfields the highest in Australia. Contributing factors including intergenerational trauma, abuse and poor access to the services that address the social determinants of health and mental health. Improved care pathways better supporting at risk people with mental health issues in the community are essential. The state-wide coverage of Aboriginal-led suicide prevention and postvention programs is poor, despite evidence that culturally-based programs have the greatest impact in preventing Aboriginal suicide.⁶⁷ Additional investment in culturally-based programs designed in close consultation with Elders and Aboriginal community-controlled services is needed.

Since the amalgamation of the Mental Health Commission and the Drug and Alcohol Office, funding for preventative initiatives set out in the Plan combines both mental health and alcohol and drug services. This makes it challenging to ascertain spending on specifically mental health services. The Council recommends the government to make this distinction clear so that funding can be rigorously assessed against the 4% target in the Plan.

The Plan also includes specific strategies to divest Graylands Hospital when this site is redeveloped, indicating that proceeds will be used to develop contemporary options and increase community based services. In opposition, WA Labor called on the previous government to ensure that every dollar from the sale of Graylands was

⁶⁷ WA Parliament Education and Health Standing Committee (2016) *Learnings from the Message Stick: The report of the inquiry into Aboriginal youth suicide in remote areas*

re-invested back into the mental health system. The Council and other peak bodies recommend the McGowan Government re-commit to this position.⁶⁸

RECOMMENDATION: Detail plans to increase MHAOD community support to 3.2 million hours by 2020

BROOME/KIMBERLEY

Approximately 40,000 people live in the Kimberley region, which has the highest proportion of Aboriginal people in the state, at almost 50%. The Kimberley has a significant level of disadvantage, with more unemployed, low income and single parent families. The proportion of children rated as developmentally vulnerable on one or more domains is also elevated relative to national averages.



Youth suicide and rates of family violence, including Elder abuse, in the Kimberley are also amongst the highest in Australia. There is a demonstrated link between the incidence of DFV and alcohol, with an average of 98% of DFV reports being recorded as AOD related.

Service delivery in the Kimberley is divided into east and west, and Broome is recognised as the region's centre. With a harsh climate, long distances and difficult terrain, delivering services in the Kimberley is challenging. In this context, providers are very reliant on effective interagency partnerships to optimise service delivery, though many stakeholders report that competitive tendering can undermine local collaborations and trust. Service models and KPIs developed through centralised agencies are invariably inappropriate, because they fail to take into account this unique context, including the additional funding required for effective outreach.

The Kimberley is home to a number of robust ACCOs that are community driven and self-determining. It goes without saying that a culturally competent workforce and supports to build the capacity of Aboriginal workers is essential. The recent boost in funding for the Aboriginal Rangers Program has been especially welcomed in the Kimberley.

68 <https://waamh.org.au/news/graylands-funds-to-stay-in-mental-health.aspx>

Financial Resilience

There is a widening gap between the highest and lowest income earners in our wealthy country, and this gap has widened over the past thirty years. WA remains the most unequal state in the nation.

Inequality is a problem for any society. It means that people have unequal ability to take part in social and economic opportunities, and it undermines the cohesiveness of that society. Inequality is also a problem for our economy. Resources become concentrated in fewer hands, resulting in reduced economic participation for the majority. Fewer new businesses are started, fewer houses are purchased, and fewer goods and services are bought. It also leads to increased dependency on government intervention.

Australia's social security safety net is based on a strong social compact between our nation and its citizenry – we pay our taxes with the expectation that, if and when we are unable to work, we will be supported. This is in recognition of the fact that any one of us could someday find ourselves unemployed. A level of structural unemployment is a fact of our current economic system – there are not always enough jobs to go around. Blaming someone for being unable to work ignores the realities of their situation, of the job market, the gap in skills between our training system and emerging economic opportunities, and the systemic barriers people may face. That, at least, is the theory.

In recent times, however, we have instead seen Federal Governments take an increasingly punitive approach to social security, seeking to blame those who are unemployed for their plight, rather than to take responsibility for their own failures in managing our economy and jobs market, our education and support systems. The Council believes that it is unjust and inappropriate to seek budget savings by forcing people off income support, or making it as difficult as possible to access the support to which they are entitled as members of our community.

There has not been a significant increase to the Newstart Allowance in over 20 years. Its value has eroded in real terms, falling behind the cost of living within our society to the point where it is utterly inadequate to provide a basic standard of living. A recent study showed that for those reliant on Newstart, it falls short of providing a minimally adequate standard of living by \$96 a week for a single

person, \$58 a week for a couple with one child and \$126 a week for a couple with two children.⁶⁹ Households on low incomes spend the vast majority of their income on essential goods and services, meaning that any additional earnings are cycled straight back into economic activity at a local level.

RECOMMENDATION: Advocate to increase the adequacy of income support payments via the Council Of Australian Governments

CONCESSIONS REFORM

Many Western Australians are facing increasing basic living expenses and stagnating wages, pushing them into financial hardship. An efficient and effective system of social concessions is a critical tool for ensuring all Western Australians maintain access to a minimum level of essential services required for basic living functions such as heating, cooling, lighting, cooking and maintaining hygiene. Our State, however, has a broad range of concessions that are inefficiently targeted and lack clearly defined outcomes.

Over half of our concessions are provided to seniors, with many delivered through the WA Seniors Card without means testing.⁷⁰ With the proportion of people aged over 65 projected to rise from 15% to nearly 20% by 2034/35,⁷¹ we face the combination of an increasing bill to subsidise the lifestyle choices of self-funded retirees, and an increasing risk of financial hardship among aged pensioners. By taking a principled approach to their concessions, we should see those concessions that deal with participation and inclusion extended to all, while those seeking to address financial disadvantage only directed toward those in greatest need.

While the previous State Government introduced some minor reforms to social concessions,⁷² these were undertaken without community consultation and did not address the systemic issues of adequacy and equity. Western Australia spent

69 Saunders, P and Bedford, M (2017) *New Minimum Income for Healthy Living Budget Standards for Low-Paid and Unemployed Australians*, UNSW Social Policy Research Centre

70 Wynne, E (2017) 'WA Seniors Card holders upset by possible eligibility changes in search for budget savings', *ABC News*

71 Department of Treasury (2015) *Intergenerational Report: Australia in 2055*, Commonwealth of Australia, p 12

72 WA Budget 2015-16, *Social Concessions Reform Fact Sheet*

an estimated \$2.74 billion overall on social concessions in 2016-17 and is projected to spend \$2.72 billion in 2017-18⁷³. An independent and holistic review could deliver fewer, simpler and clearly targeted concessions. The savings from better targeting should be used to improve the adequacy of the concessions for those experiencing financial hardship, and result in reduced administrative costs and reduced future cost growth for Government.

The Council recommends that the Economic Regulation Authority be engaged to conduct an independent public inquiry into our State's social concessions and report on the degree to which our concessions system provides adequate and equitable support.⁷⁴ It should evaluate the extent to which concessions have clear and appropriate objectives; review their design against best practice principles of adequacy, equity, adaptability and transparency; and review their implementation against best practice principles of accessibility.⁷⁵ The findings of the limited review of utilities concessions currently being undertaken by the Public Utilities Office should be submitted to the proposed inquiry.

RECOMMENDATION: Commission an independent whole-of-government inquiry into social concessions

TARIFF EQUALISATION

Whether you live in metropolitan Perth or in a regional area, the price of your electricity should be the same.

That is why our State has the policy that regional consumers pay the equivalent electricity rates as metropolitan consumers despite considerably higher costs to supply electricity outside of the South-West Interconnected System (SWIS).⁷⁶ To offset the extra costs of supply to these areas for the Government, a concealed

73 WA Budget 2017-18, BP3 p 286. The total estimate of \$2.74 billion in State public sector social concession in 2017-18 includes \$1.5 billion in operating subsidies for electricity, water and public transport service

74 This inquiry would be within the existing capacity of the ERA, hence the costs indicated are sunk costs in maintaining the ERAs capability plus some community consultations expenses

75 QCOSS (2014) *Energising Concession policy in Australia: Best practice principles for energy concessions*. Council on the Ageing (WA) (2014) *Submission to the Community Development and Justice Standing Committee's Inquiry into Policy Implications of an Ageing Community*. WACOSS, (2014) *Consumer research and representation in Western Australian electricity, gas and water markets*.

76 Tony Wood David Blowers (2015) *Fair pricing for Western Australia's electricity*, Grattan Institute, p 21

cross-subsidy in the form of a tariff equalisation contribution (TEC) is charged to SWIS consumers.

This approach, however, is inequitable and inefficient. It artificially inflates electricity prices within the SWIS and impacts disproportionately on low-income households. Each representative household in the SWIS will contribute \$76 towards the payment of the TEC in 2017-18 alone, which represents 4.4% of their annual electricity bill.⁷⁷

At the same time, households in the SWIS are seeing significant increases to their energy bills. The State Government increased the residential fixed tariff charge paid by all households for electricity supply by 10.9% at the beginning of the 2017/18 financial year, which is equivalent to a \$169 increase to every household electricity bill. In the longer term, budget forecasts show further increases of 7%, 5.6% and 3.5% in the following years to 2020-21.⁷⁸ As they spend a higher percentage of their disposable income on energy bills, the increasing cost of energy disproportionately impacts households on the lowest incomes.⁷⁹

It has been well established that there is a need to more equitably distribute the cost of the tariff equalisation policy across all taxpayers through the Government's consolidated revenue via a Community Service Obligation payment, rather than the Tariff Equalisation Fund.

The ERA has stated that the TEC "is not an efficient cost that is associated with generating, distributing or retailing electricity in the South-West."⁸⁰ They have recommended the TEC be funded from consolidated revenue, a more equitable approach that is similar to measures in other jurisdictions.

In 2012, the current Premier and Treasurer made a commitment to "cut the TEC levy and fund the TEC from general Government revenue,"⁸¹ if elected as part of a promise to lower power bills for WA households. Since the 2017 election, the Treasurer has suggested this move would cost \$600 million over the forward estimates⁸² and indicated that Western Australia is not currently in the financial

77 WA State Budget 2017/18, Budget Paper 3, p 303

78 WA State Budget 2017/18, Budget Paper 3, p 70. 'Utilities and tariffs'

79 Australian Council of Social Service (2017) "Empowering disadvantaged households to access affordable, clean energy" Figure 6, p 24

80 Economic Regulation Authority (2012) *Final Report for the Inquiry into the Efficiency of Synergy's Costs and Electricity Tariffs*. p 10

81 WA Labor (2012) *Policy Statement: Making life easier for families, lower power bills*

82 Eliza Laschon (2017) 'Calls to dump hidden regional subsidy charge from Perth, South West power bills' *ABC News*

position to absorb such a cost.

While the Council remains strongly committed to funding the TEC from consolidated revenue, in the short-term we recommend that Government exempts all households eligible for energy concession payments from paying the TEC. This is a crucial step towards ensuring those on the lowest incomes are protected from further financial hardship as part of a transition for the Government to abolishing the TEC for all SWIS customers.

RECOMMENDATION: Exempt concessional households from paying the tariff equalisation contribution (TEC) levy \$15.2 million

FINANCIAL HARDSHIP ASSISTANCE

Providing assistance to those who are struggling to pay utility bills is a vital service. That struggle, however, is only one of the ways in which financial hardship can present. Hardship policies are intended to assist customers to take control of their financial situation, but the narrow focus of the Hardship Utility Grant Scheme (HUGS) means that the funds do not necessarily target the most pressing issues for those facing financial hardship.

HUGS began as a once-off intervention to help households to better manage their budgets, linking financial counselling support with a household efficiency audit and grant. With the energy efficiency aspect removed, it has simply become a 'top-up' payment for those in financial hardship.

An average of 109 people a day applied for HUGS over the last financial year, with approximately 27,000 Synergy customers making applications to HUGS in 2016/17. These numbers indicate an increase of more than 50%, resulting in a rise of HUGS expenditure from \$4.3 million in 2015/16 to \$11.4 million in 2016/17.⁸³

A flexible, brokerage approach to financial assistance, whereby financial counsellors would be able to work with clients to make informed judgments regarding which debts to prioritise as part of a financial recovery and resilience plan can enable improved outcomes for individuals and the development of greater independence. Clients, in conjunction with a financial counsellor, would be able to determine on a

⁸³ Mercer, D (2017) 'More and More West Australians are struggling to pay their bills' *The West Australian*

case-by-case, bill-by-bill basis where the hardship grant money was most needed and how it could be best spent, with the outcomes monitored by that counsellor.

This kind of responsive model could provide greater self-determination for those in financial hardship and enable them to overcome the particular barriers preventing the achievement of financial resilience, while discouraging its use simply as a regular top-up payment where no effort is being made to address underlying financial issues.

The Council commends the government for recognising the fundamental role financial counselling services play in reducing financial and social vulnerability, as demonstrated by the 2017-18 State Budget. The allocation of \$7.4 million to reinstate and expand financial counselling services is a clear acknowledgement that investing in preventative services will result in savings across community and government.

It is also crucial, however, that the financial counselling sector has a qualified workforce that is able to meet the demand for services. The loss of experienced staff that resulted from the cuts to the sector in 2015 and the discontinuation of the Financial Counselling Diploma at TAFE places that ability in jeopardy. The Council recommends that the diploma program is reinstated in order to enable workforce growth and renewal in the local financial counselling sector.

RECOMMENDATION: Trial a flexible model of financial assistance for those in hardship \$2 million

RESIDENTS NOT ELIGIBLE FOR GOVERNMENT ASSISTANCE

Australian residents who do not have Australian citizenship are presently ineligible for government support through Medicare and Centrelink. When these people's circumstances change, including when they experience a life crisis, their prognosis is often bleak. The Council has been made aware that women escaping family violence are especially vulnerable. Many of these women and children come from Asian countries and New Zealand, and they or their partners are often on work visas. Knowing that they rarely have any other options, women's refuges are reluctant to exit them, resulting in bottlenecks in the system. A proportion of emergency relief funds and food is often allocated to this group by charitable services reliant on donations.

The Council urges the Government to establish a brokerage fund of up to \$1,000 per person per annum for residents not eligible for government support due to citizenship status that can be accessed on an as needs basis. These additional funds can be distributed by existing emergency relief mechanisms, giving them a chance to escape violent and abusive relationships and stabilise their circumstances.

RECOMMENDATION: Establish a brokerage fund for residents not eligible for support due to citizenship status \$200K

HOME ENERGY ACTION PLAN

Reducing energy consumption is an important method of reducing cost of living pressures, and it can be more cost-efficient to achieve permanent reductions in energy consumption than solely attempting to address energy hardship via tariffs, concessions and grants.

While many households are able to install solar panels or invest in the latest energy-efficient appliances, for Western Australians on the lowest incomes there are few options available to increase energy efficiency and reduce consumption costs. These households are more likely to live in lower quality housing stock, use inefficient appliances due to their lower up-front costs and have a larger energy consumption, especially during peak demand periods such as after school and in the evening. They may also be more home-bound, including children, seniors, or people with health and disability issues hence consuming more energy through the day during off-peak periods.⁸⁴

The Government can provide support in making upgrades an affordable reality by assisting these households in accessing higher-cost, but high-return, energy efficient appliances and home improvements. New South Wales⁸⁵ and Tasmania⁸⁶ have demonstrated that there are low-cost, targeted and collaborative methods available in making this policy feasible and affordable for Government.

Offering a three-year interest free loan would effectively allow eligible applicants to pay back a considerable portion of the initial loan through energy savings during this period. Initiatives adding value to this program could include energy efficiency

84 Australian Bureau of Statistics (2016) *Household Income and Wealth: Wealth of Low Income Households*

85 Office of Environment & Heritage, NSW (2017) *Government programs and financial help*

86 Groom, M. NSW Minister for Energy (2017) *Funding for TEELS to increase to \$20 million*

education, including a renter's energy efficiency checklist and home energy audits delivered by local community services.

Such an approach would enable households at risk of financial hardship to invest in valuable energy efficient improvements and renewable energy for their homes. Improving efficiency and consumption behaviours can do more to support the resilience of households and offers a sustainable, complementary solution to concessions reform.

RECOMMENDATION: : Trial a Home Energy Action Plan to reduce power bills of those on low incomes \$2 million

CONSUMER REPRESENTATION

Effective regulation and advocacy is fundamental to ensuring access to a reliable, safe, affordable supply of electricity that is fair and equitable and in line with community standards. Western Australia remains the only state in Australia without funded consumer research and representation in our energy market.⁸⁷ Despite this, WA's regulatory systems for electricity, gas and water were all designed with an expectation that consumer representation would be an active component of market regulation. The consumer codes for all these utilities require consultation and review that simply is not possible without some funded capacity.

Recognising the importance of consumer representation in essential service markets, the Minister for Water and the Water Corporation has begun providing funding to WACOSS for a part-time role. This advocacy is just as important in our energy markets, where rising costs, changing policy and significant shifts in distributed generation and consumer engagement make the issue even more pressing.

The direction of the energy market reform within WA is currently uncertain. On the one hand, we have a commitment not to privatise the distribution network operator. On the other hand, we have seen a significant change to electricity pricing and cost structure that could be interpreted as a step towards cost-reflective pricing, a requirement for opening the energy market up to full retail contestability. Research shows that negative energy market outcomes, such as market failure or

⁸⁷ Australian Energy Regulator (2017) *Retail Markets: National Energy Customer Framework*

affordability problems, have greater consequences for vulnerable consumers.⁸⁸ Experience from other jurisdictions indicate that the shift from a highly regulated market with a single monopoly provider to a more open and competitive one generates particular risks for vulnerable and low-income citizens. Those who struggle with financial hardship are less profitable and desirable as customers, while those with lower literacy and numeracy skills may struggle to understand complex service models and product choices. The result could be extremely costly for our economy and our community, should the Government go down the full retail contestability route.

In the National Energy Market, consumer representation and research funded by a market levy is commissioned and governed by Energy Consumers Australia (ECA). ECA was established in 2015 as a Council of Australian Governments initiative to give residential and small business energy consumers a national voice in the market. It advocates within the national energy market and funds grants for consumer protection and policy development.⁸⁹ The Council recommends the State Government fund ECA to commission consumer representation and research in WA.

RECOMMENDATION: : Fund Energy Consumers Australia to provide consumer representation and research in WA energy markets \$1 million

ONLINE GAMBLING

While revenue from the state-controlled TAB goes back into the public purse to be spent on infrastructure and services, online bookmakers have been able to use gambling havens to avoid paying tax in this state. The rise of online betting has meant that access to gambling has become easier than ever been before. Studies indicate that online gamblers are more likely to experience gambling problems than 'land-based' gamblers, with factors such as its privacy and convenience potentially increasing the risk and severity of gambling problems.⁹⁰ Many online gambling providers use unfair and misleading enticements to draw in vulnerable punters with access to 'easy' credit and unrealistic expectations of returns. Sports and race betting are particularly associated with problem online gambling,

88 Australian Energy Market Commission (2017) *Final Report: Retail Competition Review*, p 74

89 Energy Consumers Australia (2017), 'About ECA'

90 Australian Gambling Research Centre (2014) 'Concerns related to interactive gambling', Interactive Gambling, *AGRC Discussion Paper No. 3*

and advertising for sports gambling has proliferated with little restriction of its presentation to minors – ‘normalising’ gambling for a new generation. Following the example of South Australia and the recommendation made in the WA Council of Social Service’s previous Pre-Budget Submission,⁹¹ the 2017/18 State Budget saw the introduction of a new point of consumption wagering tax. It enables the bookmakers’ winnings to be taxed where the bets are made, rather than the jurisdiction in which they hold their bookmaking licence. This tax is estimated to raise \$52 million over the forward estimates.⁹²

We have not had the proliferation of gambling support services seen in other jurisdictions as a result of Western Australia being so successful in containing electronic gambling machines, making us unprepared to respond to a sudden rise in gambling harm and addiction. Using the proceeds from the new tax, it is critical that our state invests in an increase of gambling support services, in particular those combining treatment of addiction with financial counselling.

RECOMMENDATION: Use part proceeds from the new point of consumption wagering tax to provide addiction support and financial counselling services to those harmed by online gambling \$5 million

91 WA Council of Social Service (2016) *The Future In Our Hands*, 2017-18 Pre-Budget Submission, p 50

92 WA State Budget 2017-18, Budget Paper No 3, p7

Acknowledgments

PBS CONSULTATIONS

Consultations for the Submission commenced in June and ended in August. These were predominantly place-based, face-to-face sessions. They were convened in the east, north and south metropolitan areas and across the state in Geraldton, Mandurah, Northam, Broome and Katanning.

Consultations also happened in various sector networks and advisory committees, through the WA Peaks Forum and at the Building Resilient Communities Conference. An online survey was established for those unable to attend a session in person. More than 300 WACOSS members and other community service stakeholders contributed to the PBS via one of these mechanisms.

PBS STAKEHOLDERS CONSULTED

Aboriginal Health Council WA	Broome Youth Services	ConnectGroups
Aboriginal Family Law Service	Busselton Family Centre	Neighbourhood Centres
Aboriginal Legal Service	Cancer Council WA	Coolabaroo
Accordwest	Carers WA	Council of The Aged WA
Adventist Development Relief Agency	Carnarvon Family Support	CREATE
Aged and Community Services WA	Centacare	Crosslinks
Allambee Counselling	Centrecare	Children's Youth & Family Agencies Association
Alliance for Children at Risk	Community Employers WA	Department of Communities
Alzheimer's WA	Child Australia	Department of Sport and Recreation
Anglicare WA	City of Mandurah	Derby Aboriginal Health Service
Australian Childhood Foundation	City of Swan	Development Disability Council WA
Australian Red Cross	CLAN WA	Djooraminda Reunification Service
Black Swan	Communicare Inc	Esperance Care Services
Broome Circle	Communities for Kids – Kimberley	Escare
Broome Network	Community Legal Centres Association of WA	
	Consumers YMHWA	

Ethnic Communities Council	Meerilinga Young Children Foundation	Share and Care
Exmouth Early Years Network	Metropolitan Migrant Resource Centre	Shelter WA
Feeding the Children	Midland Women's Health Care Place	SNAICC Family Matters Campaign
Financial Counselling Network	Mid-west Community Services Network	Social Reinvestment WA
Financial Counsellors' Association of WA	Mirima Dawang Woollab-gerring - Language and Culture Centre Kununurra	South Sudanese Community of WA
FINWA	Mission Australia	St Patrick's Community Support Centre
Foodbank	National Disability Services WA	St Vincent de Paul Society
Food Rescue	Newman Neighbourhood Centre	Telethon Kids Institute
Foundation Housing	Ngala	Telethon Speech & Hearing
Family Support Networks: Armadale, Peel, Mirrabooka, Fremantle and Geraldton	Nindilingarri Cultural Health Services	Tenancy WA
Girls Without Limits	Noongar Child Protection Council	UnitingCare West
Goodstart	One Tree	Uniting Outreach
headspace Rockingham	Outcare	Valuing Children Initiative
Headwest	Palliative Care WA	Volunteering WA
Holyoake	Parenting WA	Wanslea
Indigo Junction	Parkerville	Warren Blackwood Early Years Network
Injury Matters	Patricia Giles Centre	WA NILS
Jacaranda Community Centre	Peel Youth Services	Western Australian Association for Mental Health
Key Assets	People with Disabilities WA	Western Australian Network of Alcohol and Other Drug Agencies
Kimberley Aboriginal Law and Cultural Centre	Playgroup WA	Women's Council for Domestic & Family Violence Services
Kinship Connections	Phoenix	Women's Health & Family Services
Leading Age Services	Regional Alliance West	Wunan Foundation
Lifeline	Relationships Australia	Wungening Aboriginal Corporation
Life Without Barriers	Richmond Wellbeing	YMCA
Linkwest	Rise Network	Yokai
Local Drug Action Groups	Rockingham Early Years Group	Yorganop Association
Lucy Saw Centre	Ruah Community Services	Yorgum Aboriginal Corporation
Mackillop Family Services	Salvation Army	Youth Affairs Council of WA
Marninwarntikura Fitzroy Women's Resource Centre	Save the Children	
Marnda Jarndu Refuge	Scales Community Legal Centre	
Men's Health & Wellbeing		
Men's Outreach Service		
MercyCare		

*WACOSS stands for an inclusive,
just, and equitable society.*

**WE ADVOCATE FOR SOCIAL CHANGE TO IMPROVE THE
WELLBEING OF WESTERN AUSTRALIANS AND TO STRENGTHEN
THE COMMUNITY SERVICES SECTOR THAT SUPPORTS THEM.**



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