



Youth Accommodation Association INC

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YAA Submission to the Ministerial Commission on Child Protection

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Background:

The Youth Accommodation Association NSW

VISION STATEMENT “ YAA intends that all young people are supported appropriately within their family and/or the wider community to achieve their fullest potential, and to lead independent lives as adults in society”.

PURPOSE STATEMENT “ YAA is working for young people experiencing, or at risk of, homelessness in NSW”

The YAA was established in 1979, as the peak organisation for youth homelessness in NSW. Currently there are 168 youth homeless projects funded by DoCS under the Supported Accommodation Assistance Program. Most of the auspicing bodies of these projects are members of YAA. The YAA is organised so that there are regional and metro networks which link into the main YAA network. The main network meets face to face every second month for a general meeting/policy forum. In between these meetings YAA communicates via e-groups, website (www.yaa.com.au), regular phone contact and the Grapevine newsletters. YAA staff also regularly attends local interagency and network meetings. Representatives from regions and metro Sydney sit on the YAA Board of Management.

YAA also runs the DOCS funded Youth emergency Accommodation Line (YEAL) and the NSW Health funded Health Outreach Team (HOT) project. In 2006-2007 and 2007-2008 YAA has received an additional funding each year related to the major project of the rollout of SAAP V in NSW. YAA currently has the temporary auspice of three youth Accommodation services Allawah House, Wruallian House and Canterbury Youth Refuge. Other recently funded and or joint projects undertaken by YAA: Risk Assessment Tool (with the other NSW peaks and responding to the NSW Ombudsman Report on exclusion in SAAP), LINKS Project (protocols

between Mental Health and SAAP), Self Harm Project with Streetwise Comics, Complex Needs Project with Mission Australia.

YAA participates at a policy level in numerous committees, partnerships and networks:

Ministers: Supported Accommodation Advisory Committee (SAAC) – to Community Services and Housing, Partnerships against Homelessness Resource Group (PARG) – to Housing.

With DoCS: Performance Monitoring Framework Working Group, OOHC Partners Reference Group, Stakeholder Forum, NGO Training Unit,

With Dept of Housing: Office of Community housing PBRS Reference Group, Housing Policy & Partnerships NGO Reference Group.

With Other Peaks: HomelessnessNSW, WRRC, NCOSS, YAPA, ACWA, Create, NYCH, AFHO, QYHC, Shelters, NSW Federation of Community Housing Associations.

Nationally YAA is a member the National Youth Coalition for Housing and the YAA EO sits on the Board of the Homelessness Australia

Preparing the Submission:

The YAA represents a broad network with a range of views and interests in the Child Protection system in NSW. All the YAA positions in this submission emphasise that ‘no child should be denied an appropriate level of care and protection in accordance with the United Nations convention on the rights of the child.’¹

In preparing the submission, The YAA, has undertaken consultation with its networks through its policy forum and with regional board representatives. The YAA also attended the Australian Children & Welfare Association Forum on the Inquiry in assisting the preparation of this submission.

¹ Joint Standing Committee on Treaties, The Parliament of the Commonwealth of Australia, (1998), *United Nations Convention in the rights of the Child*, 17th Report

Furthermore the YAA also has drawn on the work of our own surveys and snapshots of Children In SAAP, the ongoing work of the NSW Ombudsman in reviewing the circumstances of children in SAAP services and previous submissions, specifically our submission on the review of the Children & Young Persons (Care & Protection) ACT 1998.

The YAA would like to recognise as the peak body for youth homelessness it cannot represent all of the views on Child Protection from our networks. For this reason we have encouraged those in our networks too make submissions individually or through the public forum process.

This submission from the YAA will directly relate to the issues surrounding the interface of the Supported Accommodation Assistance Program, Statutory Child Protection and the Out-Of-Home Care (OOHC) system and focus primarily on what is referred to as the 'Children in SAAP' issue.

Whilst many of our key positions are aligned with other NSW peaks (ACWA, NCOSS), they may also vary significantly, once again acknowledgement of the sheer diversity within the sector and from which perspective one chooses to view its strengths and weaknesses.

Whenever speaking about Children & Young People, some of those working in the sector find it hard not to get deeply affected and emotional with what the day-to-day confrontations with Child abuse and neglect and often by an inability for a response. Any discussion about "Child Protection" is usually for this reason an emotional one for many. This was a difficulty in preparing the submission for the YAA, capturing the views of those who have been at the end of a failing system for many years and yet still attempting to balance this with not letting those everyday experiences become conflated with bigger picture thinking about what the system could look like.

Whilst the Submission is intended to focus on the "Child Protection System" as per the terms of reference, it is important to recognise the effect the current stressed system plays in a number of contexts at a micro level. This includes the effect a stressed system may have on 'department culture' and its flow on effects to DoCS staff and the 'inconsistencies between policy &

practice' at a ground level. It is difficult to consider the NSW child protection system without acknowledging the micro levels about DoCS, its practice and its culture.

The terms of reference that the YAA submission directly relate to include;

- *The adequacy of arrangements for children in out of home care;*
- *The adequacy of the current statutory framework for child protection including roles and responsibilities of mandatory reporters, DoCS, the courts and oversight agencies.*

More indirectly this submission will address the terms of reference relating to;

- *Management of reports, including the adequacy and efficiency of systems and processes for intake, assessment, prioritization, investigation and decision-making;*
- *The adequacy of arrangements for inter-agency cooperation in child protection cases;*

The Supported Accommodation Assistance Program

The Supported Accommodation assistance program (SAAP) is a commonwealth-state program providing support to people in the community who are homeless or at risk of immanent homelessness. The Commonwealth Supported Accommodation Assistance Act 1994 is the legislative framework for the provision of services under SAAP. SAAP is part of a broad national response to homelessness and the overall directions for the program are set out in a Multi-lateral agreement² between

² Commonwealth Government of Australia (2005) *SAAP V Multilateral Agreement*; Department of Families, Community Services and Indigenous Affairs. Canberra.

the Commonwealth government and the relevant state and territory departments.

It is the primary intention of the program to respond and address homelessness, however intersections with statutory child protection and the out-of-home-care system child exist nationally. The consequences and experiences for each state and territory of this intersection vary because of the inconsistencies in child protection legislation nationally.

In NSW, this has a significant impact on the youth SAAP service system. The program guidelines for NSW state the overall goals of SAAP are to;

*“Provide transitional supported accommodation and related support services to assist people who are homeless achieve the maximum possible degree of self-reliance and independence”.*³

Almost 40% of SAAP resources in NSW are dedicated to young people under the age of 25%.⁴ Recent Media attention has highlighted the high-unmet demand within the SAAP system. For Youth SAAP programs these rates equate too 1 in 2 children and young people being turned away⁵, however YAA believes this is inclined to be an underestimate.

SAAP has not received any growth funding in the current SAAP V agreement, despite a recommendation in the SAAP IV evaluation that a 35-40% increase was required just to maintain current service viability⁶. This background to the SAAP program is pertinent for this submission as it highlights the current state and limited capacity of the program, which none the less has been proven to be effective program in so far as the resources allows⁷.

³ Department of Community Services (2007), *Supported Accommodation Assistance Program Guidelines*:

⁴ Ibid

⁵ Australian Institute of Health & Welfare, *Demand for Accommodation 2005/06*, 19/12/2007. Available: <http://www.aihw.gov.au/publications/index.cfm/title/10491>

⁶ Commonwealth Government of Australia (2004), *National Evaluation of the Supported Accommodation Assistance Program (SAAP IV)*. Final Report. Erebus Consulting Partners

⁷ Commonwealth Government of Australia (2004), *National Evaluation of the Supported Accommodation Assistance Program (SAAP IV)*. Final Report. Erebus Consulting Partners

Amidst the highly publicized turn away rates, and limited capacity of SAAP, the strategic directions of the SAAP V Bilateral agreement⁸ for NSW emphasises a shift away from crisis accommodation. The current SAAP V bilateral agreement specifies reducing the level high cost crisis accommodation and reconfigure these into flexible support models that address national strategic directions. The YAA however, is sceptical about the notion that SAAP “24/7 crisis accommodation” is high cost when compared to Out-Of-Home Care rate⁹.

The strategic directions of the SAAP V Bilateral agreement further run parallel to the current DoCS Corporate Strategic plan¹⁰ part of which involves the rolling out of a performance based framework for SAAP services. Unit costings have been developed for SAAP¹¹ services, and these costings are notably inconsistent with the OOHC¹² costings that have been developed. Since it’s inception SAAP has been supporting some of the deficiencies in the OOHC system. SAAP regularly takes those children in or exiting state care or the out of home care system and those with high and complex needs that are not in any system.

Whilst the SAAP program is not intended to be part of the Child Protection system, ‘homelessness’ is a child protection issue and it is important for the inquiry to consider what role does SAAP then play in Child Protection? A home (not just a house) is one of the most basic need human needs especially for all children, therefore shouldn’t an emphasis in protecting children by ensuring they have adequate, appropriate housing and ‘support’.

Interface with Out of Home Care:

The OOCH provisions of the Children and Young persons (Care and Protection) Act 1998 states that arrangements for the provision of OOCH can

⁸ Commonwealth Government of Australia (2005) *SAAP V Bilateral Agreement New South Wales*; Department of Families, Community Services and Indigenous Affairs. Canberra.

⁹ Department of Community Services. *Costing Manuals* {Available} http://www.community.nsw.gov.au/DOCS/STANDARD/PC_100944.html

¹⁰ Department of Community Services. *DoCS Corporate Plan* {available} http://www.community.nsw.gov.au/DOCS/STANDARD/PC_101103.html

¹¹ Department of Community Services. *Costing Manuals* {Available} http://www.community.nsw.gov.au/DOCS/STANDARD/PC_100944.html

¹² Ibid

only be made by a designated agency or the Children's Guardian and care can only be provided by an authorised carer¹³ The NSW state government as a designated agency has statutory responsibilities for the care and protection of children and young people if for any reason a child's/young persons parent guardian is unable or unwilling to care for and protect the child/young person. OOHC is the primary alternative arrangement for children/young people requiring some form of care whether this be residential or home based care. There are many fundamental differences between what support services and outcomes SAAP and OOHC are supposed to provide for children and young people.

Primarily SAAP is a transitional service aimed at young people, whilst OOHC is in response to safety & protection issues with the aim of providing permanency and support services. Given this difference in aims, the use of SAAP for children in OOHC raises a number of policy questions.

Clearly DoCS cannot be entirely responsible for Child Protection, the broader community and to some extent, SAAP has a role to play in the well being of children in NSW. However, the extent of that ability given that current SAAP resources are not consistent with OOHC, SAAP services are not accredited by the Children's Guardian, the absence of a clear consistent policy on how the two systems interact and that children or young people who are 'homeless' rate as a low priority in the current child protection system significantly hamper the role that SAAP services can play.

Despite the absence of structured ongoing data collection of Children in SAAP there is much evidence available about the ongoing prevalence of unaccompanied children (those under the age of 16) in SAAP services.¹⁴ Anecdotal evidence from youth accommodation services suggests that when workers from the NGO sector contact the DoCS seeking assistance and support for the children under 16 who seek 'refuge' at their service, it is reported that they are met with a general resistance and a lack of support

¹³ New South Wales Parliament, Children and Young Persons (care and Protection) Act 1998.

¹⁴ Youth Accommodation Association NSW, Children in SAAP Snapshot Surveys. 2003 – 2008.

from the department. Services speculate that these children are classified as a lower priority and the Department does not have sufficient resources to deal with these “lower priority cases”. If any resources and support are available – they are ad hoc and inconsistent with OOHC. Where there is no support and resources from DoCS, where the child is not at home with their family, where they are in a SAAP service because it is the only option available ... the roles and responsibilities of the workers in the services and the rights of the child become unclear (in an ethical/moral sense which extends beyond the legislation). Workers from SAAP often refer to the struggle where no one is prepared or able to take parental responsibility of that child. In effect the child has been “abandoned” and there is a period of uncertainty and risk for that child. In terms of risk management, it is in this situation where it has been suggested that perhaps some SAAP services put themselves at risk and tension in relation to legislation, as they are forced consider and act within the grey area between duty of care and parental control. There are many implications, problems and issues for when no one is prepared to take and act on parental responsibility in a situation where a child is at risk and has come to a SAAP service seeking assistance. (This typical balancing act is demonstrated in the case study provided, and how often due to a lack of mandate, children often become further at risk than when they first came into a SAAP service).

There are many diverse views on whether or not Children should be in SAAP. In a perfect world there would be no children in SAAP. However, what remains common amongst the concerns of SAAP services is that they operates as part of the safety net for the gaps in the out of home care system. According to the NSW Ombudsman’s report¹⁵, SAAP in many instances provides an alternative placement option for those in out-of-home-care. A number of DoCS caseworkers stated “they chose a SAAP service because the programs they provided suited the children’s needs”.

¹⁵ NSW Ombudsman, (2008) *Review of circumstances for Children under the responsibility of the Minister of Community Services living in SAAP services*.

However, Utilising SAAP services in an ad hoc, inconsistent way that seriously hampers services ability to deliver effective services to its primary target group is not acceptable.

From the Ombudsman's report what is apparent is SAAP may be a respite alternative. The Ombudsman's report indicated "it should be viable for a rigorous system to be put in place to ensure that all children for whom the department has responsibility who are placed are closely monitored at a senior department level". This of course does not cover those children in SAAP who are not under any care responsibility of the department.

It is unacceptable to the YAA that 'any' child is being denied the appropriate level of care and support necessary to ensure the physical, social and emotional wellbeing of that child. Unaccompanied "Children in SAAP" represent an 'invisible' group that places services in the position of having to either accommodate children 'at risk' or make the decision not to accommodate, which may place the child at a greater risk. If SAAP funded youth services do decide to accept these 'children', who by definition are not the target group for the youth SAAP sector, then some of the scarce DoCS SAAP funding will be diverted away from the target population "youth homelessness".

The YAA therefore would encourage the inquiry to consider closely the impact the use of SAAP services for children has on SAAP services to be able to deliver services to their target population.

Children in SAAP Case Study 1:

(Specific Details of the person[s] involved have not been provided to ensure confidentiality]

Example:

Child (15yrs) self refers to SAAP service. SAAP services contacts parents who agree the young person cannot reside with family, no other placement options. DoCS notification made as per mandatory requirements. SAAP service works to resolve issues with family, however after 1.5 months decide

that thinking about other options is necessary as it is unclear whether parents will take child back. Staff concerned about child's ability to live independently. Application made for Centrelink allowance (living away from home rate) Child unable to enter private rental market because of age and income status. Medium term options limited and have waiting lists. End of three months (max placement), SAAP services make another notification, child highly at risk, as it is not clear where they will reside. No response or feedback from the department, child simply placed in another Crisis SAAP service, this time away from area of origin.

Several months later child refers back to SAAP service, and it becomes apparent child is transient, at risk of leaving school, and income still not finalised. Exit options still remain limited due to age.

Interface with Statutory Child Protection

Structure of Department:

Some areas of the sector consider that changes to the Structure of the Department of Community Services may have a positive impact on the Child Protection system in NSW. Possibly this would look something like a "Dept of Child Protection" and a "Dept of Community Service". The reasons are varied, however a common reason behind this position being put forward relates to the current limited access points and pathways into assistance programs delivered by the department.

The access point for 'assistance' is the same as the access point for 'a statutory response'. This does appear at the surface level to pose some problems. For example: A family requiring an early intervention response could only access support through one entry point and that would be into 'Child Protection'. The YAA in this submission will not discuss the more detailed issues surrounding this issue. Clearly creating more access points into the Departments programs is important given the importance of early intervention.

The following three considerations were raised by the sector in relation to any changes in structure of DoCS as a result of the inquiry:

1. Can structural change occur without the department being split?
2. Is there clear evidence that this is beneficial?
3. Would any department split provide more or less resources for children and young people?

The YAA believes any structural change cannot be simply about ‘shuffling of the desk chairs’. (E.g Early Intervention resources must not be simply shifted across from other points of the system). As SAAP services continually stipulate “what about those in need right now”. It is clear additional resources need to be added to the overall system, not just shifting them about.

Furthermore, it is important that deep consultation occurs if this is a recommendation of the inquiry and evidence is provided about how this will improve the plight of children and young people in NSW.

The YAA believes the core business of DOCS embraces universal service provision within a community service context and effectively compliments the multiple needs of SAAP clients and the work of the SAAP sector. The overall objectives of DOCS are concerned with the welfare of children, families and community well-being. Both the department and SAAP have a crossover in their target. This also needs to be considered in any recommendation about structural change within the Department.

The YAA further believes the inquiry should consider and examine other structural arrangements for Child Protection systems nationally and internationally.

The structural arrangements in the Victorian system (Department of Human Services), allow it to function as a “Human Service” department, whilst retaining separate functions within it. In NSW, currently to access a range of “Human Service” bodies, you may need to visit several separate departments i.e. housing, child protection, health etc... Whilst not suggesting the Victorian context is applicable here in NSW, it demonstrates a need to rethink how resources can be drawn into the Child Protection system.

The Interagency Guidelines for Child Protection Intervention are a pertinent example of an attempt to overcome the problems of multiple departments attempting to provide services to protect children in NSW. Simply put, interagency must go further than high-level department MOU's. To be meaningful part of the everyday practice of those working in the context of protecting children, it needs to be resourced and supported on a number of levels.

Mandatory Reporting:

YAA is aware of the ongoing media attention paid to 'children at risk', including ongoing reporting leading up to and through the inquiry. What is most concerning about this coverage has been the lack of attention paid to those 12-16 years of age. There is a perception that child protection is about very young children '0-8' and child protection is not viewed through a much broader lens.

It is obvious in the current over burdened system of mandatory reporting that people in this age group do not rate as 'high risk' and therefore don't receive a child protection response. However, it is an assumption by Helpline staff in their current Risk Assessments that "Age" reduces risk. This assumption poses some very serious concerns. Utilising this concept ignores all the human development theory and diversity of where children and young people are in relation to their biological, psychological and social development.

It is important to highlight that under the widely accepted definition of homelessness from Chamberlain and Mackenzie¹⁶, children or Young people in SAAP accommodation are homeless. Furthermore 'homelessness' for any child is reportable under the current Child & Protection Act.

Clearly at present the older children are not a statutory priority, however it must be within the interest of DoCS to have a response. There is significant evidence to suggest [Chamberlain & Mackenzie] that many homeless youth have a high chance of entering into adult homelessness and ultimately chronic homeless. Therefore entering DoCS Adult SAAP programs and

¹⁶ Chamberlain, C. & Mackenzie, D.(1998) *Youth Homelessness: Early Intervention & Prevention*. RMIT

placing strain on the adult system. The future children of these young people would therefore have a higher chance of a trajectory into a pathway or 'career' of homelessness. It is critical the department consider children and young people in SAAP as a priority response.

The system of mandatory in its current state is unsustainable. The burden of the system is not only problematic for SAAP services but the entire community services sector, so much so homelessness does not register on the radar. The YAA supports that a more flexible filter system is required to ease the burden of notification reporting on the DoCS helpline and ensure those who need a response get a response despite of age.

However, the YAA continues not to support any shift towards 'evidence based reporting'¹⁷ as per its recent submission to the review of the Children & Young Persons (Care & Protection) Act 1998.

Amongst the broader sector, there appears to be some consideration that dismantling the centralised Helpline and moving towards more local based intake systems is the way forward. However, once again before the YAA would support such a change, a number of factors would need to be considered.

1. What would a new system look like and would it be a good utilisation resources?
2. How will local responses remain consistent statewide?
3. How will quality control be ensured across all Customer Service Centre's (CSC)?

It is also critical to be aware that other reforms may have an impact on the current Helpline and as a result an improved service. The issues surrounding the Helpline obviously are interrelated to other matters discussed in other submissions. Better arrangements and responses at the local CSC level should be undertaken despite the fact of the existence of non-existence of a centralised reporting system.

¹⁷ Department of Community Services, *Issues Paper: Review of the Children & Young Persons Act 1998*. November 2005

Current work with the Department of Community Services

In December 2005, DoCS met with the YAA to discuss a response to YAA's Unaccompanied Children in SAAP Policy, Position Paper and Guidelines (2004). In March 2006, YAA received the first draft policy for comment, following an endorsement by the director general. This was a significant step forwarding in developing a formalised policy around the issue of children in SAAP services in NSW. Currently the sector is awaiting further consultation with the department after responding to a draft policy¹⁸ on unaccompanied children in SAAP put together in March 2006. The sector raised a number of issues in regards to the draft policy. The broad position by the Department in the draft policy was that "DoCS would provide support to children between the ages of 13-16 years in Youth SAAP services and it is important that these children are supported in a manner that helps prevent entry into the Child Protection System. DoCS support would be a cost based allowance for board and lodging"

The draft 'Assisting Unaccompanied Children Under 16 Years in SAAP Youth Accommodation Services' policy further stipulated a DoCS assessment would be undertaken when a risk of harm report was made. (Currently this is mandatory for all SAAP services when a child enters a SAAP service). And that case management by a child protection caseworker would only happen following a risk of harm investigation and DOCS intervention being warranted. Therefore YSAAP services should work to reconnect the child within 3 months and if unable to do so, make a report. The issues raised are significant because they relate more broadly than just as a response to the policy. These are the issues services have been dealing with in NSW for a number of years.

This policy position and practice from the department in relation to YSAAP services currently continue to reinforce that SAAP is part of the Out of Home Care System. This is despite YSAAP clients not receiving the same level of support as those in the OOHC system and are outside of the target age

¹⁸ Youth Accommodation Association NSW, "YAA's response to DoCS Draft Policy "Assisting unaccompanied children under 16 years in SAAP youth accommodation services" June 2006.

range. This also is related back to the inconsistencies in unit costings developed for SAAP and OOHC.

The YAA welcomed the new funding package at the end of 2002, which saw an additional \$500 million dollars over 5 years for Child Protection Services in NSW. This included the introduction of 150 additional caseworkers. This was especially welcoming in the context of the ongoing children in SAAP issues that some flow on from these additional resources would result in fewer children in the SAAP system. The YAA from its own surveys and anecdotal evidence from the sector has shown a decrease in the numbers of children under 12, or 12 – 14. However this has also meant the age of children in SAAP services is now more at the higher end 14 & 15 years of age has increased¹⁹. However, the broader issues surrounding children in SAAP services in NSW remains.

In the NSW Ombudsman's Report of Reviewable Deaths in 2006²⁰, DoCS responded to recommendations of the 2005 Child Death inquiries by stating DOCS were "working on a policy with Youth Accommodation Association (YAA) to develop a policy that clarifies the level of support provided to unaccompanied children under 16 who enter SAAP services. The policy '...will establish consistent, transparent and equitable arrangements for providing case management and financial assistance for children in YSAAP services.' DoCS then plan to develop a protocol that will clarify roles and responsibilities of DoCS and YSAAP services. DoCS indicated the policy will be 'settled' in a few months"

A number of other issues that stem from this protocol work with the department:

- SAAP resources do not allow it to act to resolve family conflicts every time a child enters SAAP, especially when the services are focused on delivering crisis services. (Services currently can only meet 15%

19 Youth Accommodation Association NSW "Children in SAAP snapshot survey" 2003-2008.
20 NSW Ombudsman, *Report of Reviewable Deaths in 2006 Vol 2 Child Deaths*

approx of the demand let alone work with children outside of the national target group.)

- Whilst the unaccompanied children in SAAP issue remains unresolved. The sector is poorly placed to meet the objectives and become flexible and responsive as stipulated in the SAAP V Multi-lateral agreement.
- Many services have reported even after 3 months stay in a crisis YSAAP service, and another risk of harm report is made and services make it clear they can no longer accommodate the child, often there is no response from the department
- Children in SAAP contradict the principles of permanency planning in child protection. Under 16's require longer than 3 months in a transition crisis refuge because it is very difficult to find exit options. SAAP services are forced to become desperate in attempting to place a child into an appropriate placement a role that should lie with a statutory body.

Concluding Statement:

It is unfortunate that this submission from YAA cannot provide the inquiry any significant changes in its key messages that have been provided in a number of other contexts over many years. The issue of "children in SAAP" has been and continues to remain a constant issue throughout the history of the program in NSW. Without a more rigorous system and adequate resourcing, consistent with OOHC, that ensures SAAP continues to also deliver services to the programs intended target population, we can not be certain that NSW will have the most effective child protection system as possible for all children in NSW.

It remains over 2 years since YAA and DoCS commenced this process, it is somewhat urgent that a policy on unaccompanied children in SAAP is

resolved promptly and must be within the interests of DoCS to properly address the issue of children in SAAP. The YAA does not believe SAAP will create a defacto tier of the OOH system, nor a replacement for OOHC. The YAA will also continue to be concerned about the quality of the NSW Child Protection system and ensure that we come from a 'rights and well being of children and young people' paradigm²¹ rather than exclusively a 'child protection' paradigm. The key to this is the intent of the Act to provide an appropriate standard of care for children and young people (rather than an ad hoc, last resort, just in time approach).

We appreciate the opportunity to provide this submission to the inquiry. Please contact us with any inquiries regarding our submission or related to the inquiry.

²¹ National Coalition of Housing 2005 *"States of Neglect: An Analysis of child protection and the link with Child and Youth Homelessness"*.

ENDNOTES

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