

APPENDIX A

Submissions and comments

We have consulted with DFFH, Anglicare, Uniting and VACCA, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Responses were received as follows:

DFFH	46
Anglicare.....	51
Uniting	54
VACCA	56



Secretary

Department of Families, Fairness and Housing

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BAC-CO-27712

Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31/35 Collins Street
MELBOURNE VIC 3000

Via: Secure network: Kiteworks

Dear Mr Greaves

Thank you for your letter of 27 May 2022 and the provision of the proposed report for the *Performance Audit of the Kinship Care Model*. I welcome the opportunity to provide the Department of Families, Fairness and Housing's (the department) response to the recommendations.

The department is committed to delivering services that achieve the best outcomes for vulnerable children, young people, their families and carers who are involved with the child protection program.

Early identification of kinship networks is critical to the safety and wellbeing of children and young people. Kinship networks strengthen the support and assistance to the child, young person and their family and remain the preferred placement type for a child or young people who cannot reside safely with their parents.

The Kinship Care model, established in 2018, provided new and strengthened components of service delivery by the department and our funded sector partners to enable children and young people to be connected within their kinship networks and for carers to be supported to provide quality, safe and stable care.

The department has reviewed the report and accepts the report and the twelve recommendations. The implementation of some recommendations may require further consultation with Aboriginal Community Controlled Organisation or are funding dependent. An action plan addressing the recommendations has been developed and is enclosed.

The acceptance of the findings and recommendations reflects the department's continued commitment to improving the quality care to children and young people and to supporting kinship carers to undertake the important work they do in caring for some of Victoria's most vulnerable children and young people.



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Should you wish to discuss the department's response, please contact [REDACTED]

[REDACTED]

Yours sincerely

[REDACTED]

Brigid Sunderland
Secretary

10 / 06 / 2022

Enc: DFFH Action Plan: response to recommendations - Kinship Care Model audit



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Department of Families, Fairness and Housing

Action Plan - Kinship Care Model

No	Recommendations that the department:	Response	Department response	By the end of:
1	sets benchmarks identifying kinship networks early	Accept	<p>The department will:</p> <ul style="list-style-type: none"> establish a clear definition and associated benchmarks for early identification for kinship networks in the context of Kinship Finding activities performed by Kinship Engagement Teams (having regard to other roles such as child protection) and update the <i>Kinship Engagement Teams – roles and responsibilities</i> guidelines and Child Protection Manual. 	March 2023
2	develops a mandatory and ongoing training program for child protection practitioners to improve their awareness of kinship engagement teams' role	Accept	<p>The department will:</p> <ul style="list-style-type: none"> develop a training module on kinship finding and Kinship Engagement Teams delivered as a mandatory component in Beginning Practice for new child protection practitioners. develop a standardised refresher training package for child protection practitioners and materials for the sector to support, educate, and promote the role of the Kinship Engagement Team. 	December 2022
3	updates its child protection manual to include specific triggers for when and how child protection workers should refer cases to Kinship engagement teams	Accept	<p>The department will:</p> <ul style="list-style-type: none"> review and update the Child Protection Manual to include referral triggers and improved guidance for Child Protection on the referral process and when to use the Kinship Engagement Teams for kinship finding 	December 2022
4	implements consistent monitoring and reporting for kinship finding activities which at minimum captures the amount of time it takes between a kinship engagement team receiving a referral and identifying a kinship placement	Accept	<p>The department will:</p> <ul style="list-style-type: none"> scope the available data sources to inform monitoring and reporting capacity on kinship finding activities and where possible utilise these to develop reporting templates and monitoring processes. where required, develop additional monitoring and reporting tools to enable effective monitoring and reporting <p>The department advises where significant enhancements or new data platforms are necessary requiring additional budget, the timeframe may need to be adjusted.</p>	March 2023
5	works with service providers to agree and set benchmarks for finding Aboriginal and Torres Strait Islander kinship networks to be accountable	Accept	<p>The department has:</p> <ul style="list-style-type: none"> commenced an Aboriginal Kinship Finding Service (AKFS) service enhancement project with Aboriginal service providers to undertake a co-design with Aboriginal agencies to develop an agreed set of benchmarks for Aboriginal Family Finding. As an outcome of the co-design and AKFS working group, agreed benchmarks for service providers regarding the time taken from referral to identification of kinship networks. <p>The department will:</p> <ul style="list-style-type: none"> scope the available data sources to inform the development of kinship finding monitoring and reporting tools to review performance against agreed outcomes. 	June 2023

Response to Victorian Auditor General's Office (VAGO) Performance Audit Kinship Care model 2022

No	Recommendations that the department:	Response	Department response	By the end of:
6	<p>establishes processes to monitor and report on:</p> <p>6.1 the number of referrals the DFFH makes to service providers for Aboriginal kinship finding program</p> <p>6.2 the service providers' outcomes for Aboriginal and Torres Strait Islander kinship finding activities</p>	Accept	<p>The department has:</p> <p>Recommendation 6.1</p> <ul style="list-style-type: none"> established an Aboriginal Kinship Finding Service (AKFS) service enhancement project with Aboriginal service providers. The project will develop program requirements including a refined referral process and key performance indicators. <p>The department will:</p> <p>Recommendation 6.2</p> <ul style="list-style-type: none"> utilise the AKFS working group develop a process to monitor and report on service providers outcomes for Aboriginal and Torres Strait Islands Kinship finding activities and systems architecture to enable data recording, monitoring, and reporting <p>The department advises where significant enhancements or new data platforms are necessary requiring additional budget, the timeframe may need to be adjusted.</p>	June 2023
7	<p>monitors and reports on whether child protection staff and, where relevant, community service organisations and Aboriginal community-controlled organisations:</p> <p>7.1 are completing part A, B and C assessments on time</p> <p>7.2 are completing part A, B and C assessments to sufficient standards</p>	Accept	<p>The department will:</p> <p>Recommendation 7.1</p> <ul style="list-style-type: none"> develop a reporting tool for managers to monitor the completion of Part A, B and C carer assessments within the required timeframes. strengthen monitoring to provide review and monitor Child Protection, Community Service Organisation and Aboriginal Community Controlled Organisation's performance. <p>Recommendation 7.2</p> <ul style="list-style-type: none"> develop and implement methods for assessing the quality of Part A, B and C carer assessments including a strengthened focus on kinship carer support needs. 	March 2023
8	<p>reviews the special negotiated adjustment process to increase transparency and equity in care allowance payments process</p>	Accept	<p>The department will:</p> <ul style="list-style-type: none"> review the <i>Care Allowance Policy and Procedures</i> guidance to improve care allowance processes with a view to improving transparency and equity across care types. review and update available information and resources that support kinship carers to understand the care allowance application and decision-making process, including eligibility for each care allowance rate. <p>The department advises any further realignment of care allowance across care types will be budget dependent, and unable to be implemented until such time that government appropriation is provided.</p>	June 2023
9	<p>monitors and reports:</p> <p>9.1 if all eligible kinship care cases are referred to First Supports</p> <p>9.2 if referrals are made on time</p>	Accept	<p>The department will:</p> <p>Recommendation 9.1:</p> <ul style="list-style-type: none"> develop tools and systems to identify, monitor and report on whether all eligible cases are referred to First Supports. review the eligibility criteria to simplify and address any barriers to referrals. <p>Recommendation 9.2:</p> <ul style="list-style-type: none"> scope available data sources to inform monitoring and reporting on whether referrals are made on time <p>The department advises where significant enhancements or new data platforms are necessary requiring additional budget, the timeframe may need to be adjusted.</p>	<p>March 2023</p> <p>June 2023</p>

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Response to Victorian Auditor General's Office (VAGO) Performance Audit Kinship Care model 2022

No	Recommendations that the department:	Response	Department response	By the end of:
10	identifies the data it needs, establishes a performance baseline and defines data collection methods for the new model's outcome measures	Accept	<p>The department will:</p> <ul style="list-style-type: none"> review the 21 outcomes measures to determine if the measures remain adequate and an appropriate reflection of the models' intended outcomes, and whether data on outcomes is available where required the outcome measures will be re defined establish baseline performance measures, informed by the review, and how this information is collected, noting electronic data collection methods are preferred, such as Client Relationship Information System (CRIS). <p>The department advises where significant enhancements or new data platforms are necessary requiring additional budget, the timeframe may need to be adjusted.</p>	June 2023
11	systematically monitors and reports on if the new model is contributing to high-quality, safe and stable placements	Accept	<p>The department will:</p> <ul style="list-style-type: none"> on completion of recommendation 10 (review the 21 outcome measures to inform a the define benchmarks) identify where quality safety and stability measures are captured in related data systems and where system enhancements may be required, where required develop monitoring and reporting tools to measure outcomes <p>The department advises where significant enhancements or new data platforms are necessary requiring additional budget, the timeframe may need to be adjusted.</p>	June 2023
12	collects and presents data in its carer surveys that differentiates between results for different types of out-of-home care carers	Accept	<p>The department will:</p> <ul style="list-style-type: none"> collect and present the data in a way that differentiates the results for different types of out-of-home care carers in any future carer survey. 	N/A



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9/06/2022

Mr Andrew Greaves
Auditor General
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Level 31/35 Collins Street
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Dear Mr Greaves,

Re: Proposed Performance Audit Report Kinship Care

Thank you for the opportunity to participate in the Kinship Care Performance Audit, and to provide comments in response to this report. Anglicare Victoria welcomes the recommendations by the Auditor General, and the resulting improvements for Kinship Care programs across the state.

Anglicare Victoria is one of the largest providers of funded Out of Home Care (OOHC) services in Victoria, we have delivered Kinship Care case management programs since 2010, and the First Supports program since it was established in 2018. We are familiar with the challenges and complexities of this type of care, and the support required to address the unique circumstances of Kinship care families. We welcome the opportunity to participate in ongoing review and development of the Kinship Care model in line with the recommendations of this report, and would highlight the following key considerations:

Caregiver Support

Anglicare Victoria strongly agree with the recommendations that address availability of support to Kinship carers, particularly the review of the special negotiated adjustment process to increase transparency and equity in the care allowance payments process. The contrast between Kinship care carer allowance levels and those attributed to Foster carers is well documented, in both the Auditor General's report and the Victorian Ombudsman's 2017 Kinship care report.

Anglicare Victoria welcomes a system change to allow Kinship carers to more readily access the most suitable level of allowance to meet the needs of the children and young people in their care in line with Foster care allowances. We would also note that this discrepancy of funded support to Kinship carers extends beyond the carer allowance, and

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welcome this opportunity to highlight the strengths of additional supports available to other forms of home based care – specifically Foster care. Foster care carers:

- can access ongoing placement support grant funding in addition to the establishment costs identified at commencement of placement, and
- are supported by a greater allocation of Agency staffing and resources when a placement arrangement is determined to have more complex needs, enabled by different target levels contracted to service providers determined by the same factors as carer allowance rates for placement.

The capacity for Kinship carers to have the same enhanced supports available to Foster carers would further alleviate the financial stressors on placements, with agency distributed placement support brokerage allowing for a more efficient response to funding requests, and carers and children receiving additional support and assistance in a timely manner.

Monitoring and Supporting Placements

In conducting any review of the Kinship model, Anglicare Victoria encourage consideration of the overarching model for all components of the service, rather than individual components of the new model in isolation, to ensure that the new model of Kinship care integrates with existing programs and supports for children in OOHC and their carers.

Anglicare Victoria support recommendations on the monitoring and reporting on timely and quality completion of Part A, Part B, and Part C assessments, by both Community Service Organisations (CSOs) and Child Protection staff.

The completion of these assessments is vital in identifying the needs of each placement, and provides recommendations for support needs for Kinship carers and children and young people in placement.

In the establishment of a monitoring system for these assessments, we would welcome a further development to determine also whether recommended actions, referrals or supports are being implemented as a result of these assessments, to ensure that Kinship families are receiving a quality as well as timely service.

The current model, and the defined roles and responsibilities of Child Protection and CSO staff in the monitoring and support of Kinship placements, results in a fragmented service for families in kinship care, with multiple services involved across the course of a placement, and assessments and recommendations often being completed by a different service than those responsible for the implementation and monitoring of their completion.

Families referred to CSO First Supports programs are often not yet eligible for funded Case Contracting programs at closure of First Supports, meaning they return to Child Protection case management, pending a further allocation to the CSO once eligibility requirements are met, either through resolution of court activity or case planning decisions.

Reviewing Roles and Responsibilities

With growing pressure on the OOHC system as a whole, the need to ensure quality, consistent and flexible services to establish, maintain and support kinship care placements is essential.

The vast majority of OOHC service types have been transitioned from the Department of Families Fairness and Housing to CSOs and ACCOs, who are successfully delivering OOHC services such as Home Based Care and Residential Care across the State, allowing Child Protection to focus on its core responsibility of investigation of child abuse and neglect, and forensic assessment and planning. The continuation of DFFH Child Protection delivered Kinship services is at odds with this wider progression.

CSOs have demonstrated expertise and flexibility in meeting the complex and varied needs of children in OOHC, their carers and families, and would be well placed to deliver a more comprehensive, funded 'end to end' Kinship care program, providing a focussed and responsive service to support stable and quality placements for children in OOHC.

Anglicare Victoria are committed to assist in the implementation of the report's recommendations and we welcome the opportunity to further share our experience and expertise in the delivery of OOHC services, and engage in further discussion with DFFH on proposed system and service changes.

Yours sincerely,



Sue Sealey

Deputy Chief Executive Officer

Anglicare Victoria



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10 June 2022

Mr Andrew Greaves
Auditor General
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Australia

Dear Auditor-General

Uniting Vic.Tas appreciated the opportunity to participate in the Kinship Care Performance Audit and the invitation to provide a response to the report. Kinship Care has a unique and vital role in Victoria's Out of Home Care system, and we welcome the findings and report recommendations which we believe support ongoing strengthening of the program.

Uniting Vic.Tas is the community services organisation of the Uniting Church in Victoria and Tasmania. We have worked alongside local communities in both states for over 100 years. We deliver a broad range of community services including the full range of children, youth and family services of which Kinship Care is a part.

We believe that the report and implementation of the recommendations will strengthen the experience and outcomes for those children, young people and families involved in the kinship care system. We fully support the recommendation for a clear benchmark for identifying kinship networks early. Finding a home early is important to ensuring children and young people are safe and providing sufficient support for carers is key to this.

Uniting believes the opportunities to improve the system would be greatly supported through clarification of the roles and responsibilities relating to the Department, Community Services Organisations (CSOs) and Aboriginal Community Controlled Organisations (ACCOs) who all have an important part to play in Kinship Care. Progressively, OOHHC programs have transitioned from the Department of Families, Fairness and Housing (the Department) to Community Services Organisations (CSOs) and Aboriginal Community Controlled Organisations (ACCOs), allowing the Department to focus on statutory responsibilities such as investigations into allegations of abuse and neglect of children and young people. As has been highlighted in the report, the Department continues to hold elements of the Kinship care system. This is a contributory factor to the complexity of the service system, impacting timeliness of assessments and support for carers. There is an opportunity and a need to clarify the roles and responsibilities of each entity, streamline the system, reduce complexity, and enable more timely, tailored, and integrated supports for carers.

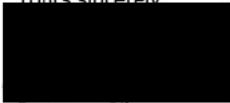
CSOs and ACCOs have the expertise to support the children and young people in kinship care who have highly complex needs and have experienced trauma in their lives. A more holistic delivery of the program could be achieved should full transition of kinship care occur to CSOs and ACCOs.

We note that kinship carers have reported an increased satisfaction with CSOs and ACCOs and are pleased that support has significantly increased between 2018 and 2021. However, we need to ensure that the system and funding provides children and young people with the best quality of care we can give them.

Kinship carers are often under extreme financial stress. We are pleased the report acknowledges that carers are not getting the support they need and welcome the recommendation for a more equitable and transparent care allowance payments process. We know from our own carers that financial strain has been increasing with some carers using their own savings and superannuation to support placement. We know that foster carers also have access to more enhanced placement supports including specialist supports and establishment costs as well as respite options and therapeutic case management. They consider these supports invaluable and we believe they should equally be available to Kinship placements.

Uniting is committed to continuing to work in partnership with the Department and sector partners, to support implementation of the report's recommendations. We are committed to supporting the continued strengthening of the Kinship Care system so that outcomes for children and families can be improved.

Yours sincerely



Bronwyn Pike
Chief Executive Officer



9th June 2022

Mr Andrew Greaves
Auditor General
Victorian Auditor General's Office
Level 31/35 Collins St
Melbourne, Vic, 3000

Dear Andrew,

Thank you for the opportunity to participate in the Performance Audit Report Kinship Care. VACCA acknowledge the work undertaken by the Victorian Auditor General's Office on this audit.

VACCA have read and reviewed the Performance Audit Report Kinship Care and accept the recommendations. VACCA believe that the recommendations will strengthen the support of kinship carer and experiences and outcomes for children placed in kinship care placements.

As a state-wide provider of Aboriginal Out of Home Care (OoHC) programs and services we are aware of the complexities and challenges of the current service system. VACCA welcome the opportunity to participate in the ongoing review of the Kinship Care model in line with the recommendations within the report.

The audit findings demonstrate the current model can be significantly strengthened to better support carers and children in kinship care placements and address the current gaps.

The report identifies that within the current kinship model; carers are not getting the support that they need, Kinship care model is fragmented, and there is growing pressure on placements and the level of support carers receive across OoHC system.

VACCA's recent carer survey in 2020 showed some similarities to the audit report in the following:

- Financial assistance among kinship carers was desperately needed with 4 out of 10 kinship carers access VACCA emergency relief in the past twelve months- this demonstrates the level of financial vulnerability of these households.
- Kinship carers felt un-prepared for the role and wanted more understanding of roles and responsibilities, and Training was also high
- Multiple case workers and the inconsistency of workers and the added pressure this puts on carers to constantly have to start again and educate workers on their case.

Reviewing roles and responsibilities within the Kinship model

In strengthening the Kinship model VACCA would welcome a focus on reviewing the roles and responsibilities of DFFH (Child Protection and the Kinship workers) and the sector and aligning the Kinship model with the Foster Care model.

The current Kinship model roles and responsibilities create a fragmented service for families and carers in kinship care, with multiple changes to supports involved across the course of a placement.

Connected by culture

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Child Protection undertakes as its core responsibility investigation of child abuse and neglect reports and forensic assessment and planning. However, it is the largest provider of OoHC services in Victoria.

The sector holds expertise in providing tailored OoHC interventions to best meet the needs of children, carers and their families based on short, medium and long intervention goals for children. The sector's OoHC providers do not juggle forensic responsibilities with care responsibilities, so they are able to understand more fully how a child's needs change over time and the importance of adapting interventions to best meet the child and carer needs.

Whilst Aboriginal Children in Aboriginal Care providers also undertake forensic responsibilities post Court their practice framework enables strong integration of care and risk management.

The Department has progressively transitioned other OoHC programs to the sector such as Foster Care and residential services. It is also committed to transitioning all Aboriginal children to the care of ACCOs. VACCA strongly recommend that the transition of all types of kinship care to the sector occurs over the next few years. This will also enable kinship First Supports to be more available to carers and children as a starting point.

In review the roles and responsibilities VACCA would welcome the review implementation of an extension to family support hours within the initial placement to bridge the gap between first supports and contracting. Families referred to ACCO First Supports programs are often not yet eligible for funded Case Contracting programs at closure of First Supports, meaning they return to Child Protection case management, pending a further referral to ACCO once eligibility requirements are met.

This extension would enable continuity of service provision rather than the current system of children and carers being handed back to Child Protection and then at a later stage contracted to the sector, and align with the Department's commitment to transitions all Aboriginal children to the care of ACCO's.

Alignment of kinship care with foster care model

VACCA believes that the alignment of the Kinship model with that of the Foster Care model will address key gaps and findings outlined in the report. An overview of the key areas of alignment that should be prioritised include:

Care payments and brokerage

Aligning Kinship and Foster care payments and brokerage will ensure kinship carers are able to better support children without financial stressors. Further it will reduce the workload on DFFH around monitoring client expense and ensure that placement and support plan goals are able to be met within shorter timeframes.

Carer and placement support

- Sector agencies be reimbursed similar to the Foster care program to enable carers to be better supported.
- Sector funding for Kinship care be comparable to Intensive level payments of Foster care. This will enable capacity to provide timely support to ensure kinship placements are supported.



VACCA

Review of Kinship assessments, monitoring and reporting

- The responsibility of completion and endorsement of Kinship carer assessments to align with that of the Foster care model and all assessments including Kinship Part A assessment to be outsourced to the sector.
- As recommended in the report an increased level of monitoring and reporting on timely and quality completion of Part A, B and C assessments, as this will ensure that placement support needs are identified sooner and safety screening is completed within appropriate timeframes.

VACCA looks forward to continuing to work with the sector and DFFH in the implementation of the recommendations of the audit to better improve service delivery and supports to children and carers in kinship placements.

Yours sincerely,



Muriel Bamblett, AO
Chief Executive Officer