

# APPENDIX A

## Submissions and comments

We have consulted with DFFH and we considered its 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 this agency and asked for its 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 .....	44
------------	----

---





Secretary

Department of Families, Fairness and Housing

50 Lonsdale Street  
Melbourne Victoria 3000  
Telephone: 1300 475 170  
GPO Box 1774  
Melbourne Victoria 3001  
[www.dffh.vic.gov.au](http://www.dffh.vic.gov.au)

BAC-CO-29968

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

Dear Mr Greaves

Thank you for your letter of 17 August 2022 and the provision of the proposed report on the performance audit of the *Quality of Child Protection data*.

I welcome this opportunity to provide the Department of Families, Fairness and Housing's (the department's) response to the recommendations made by your office. I am also pleased to provide you with advice regarding the actions the department is already taking and intends to take in relation to the recommendations made by your office.

I would like to thank your team for working with departmental staff so productively and appreciate the report of your acquittal against the feedback provided by the department. I note and appreciate the inclusion of our feedback in the draft final report.

The department has reviewed the report and accepts the report and the three recommendations. The implementation of some of the recommendations has already commenced, which is noted in your proposed report. The department is actively exploring the options identified in our response to further address the issues raised in the proposed report.

Please find attached the department's Action Plan addressing the recommendations made by your office.

Yours sincerely



**Brigid Sunderland**  
Secretary  
Department of Families, Fairness and Housing

02/09/2022

Encl. **Attachment 1** – department Action Plan



**OFFICIAL**



### Department of Families, Fairness and Housing action plan to address recommendations from *Quality of Child Protection Data*

The department has taken active steps to address data quality including to progress development of the data quality management plan and a review of data controls. There is a comprehensive and evidence based risk assessment framework within child protection that incorporates the judgement, skills and practice knowledge of child protection practitioners. Data is important and is drawn on as part of the assessment and decision making process.

The department is actively undertaking a range of activities to support the Child Protection workforce. This includes continuing to progress an ICT program that encompasses a range of enhancements to address many of the data systems issues identified in this report. The department is also redeveloping Carer Payment processes, policy and technology with a new Enterprise Payment Platform.

No.	VAGO recommendation	Action	Completion date
1	<p>DFFH - As required by the <i>Data Quality Information Management Framework Standard</i> and <i>Data Quality Guideline Information Management Framework</i>:</p> <ol style="list-style-type: none"> <li>Continues to assess all of its child protection data against data quality dimensions to identify data quality issues, including but not limited to the gaps identified in this audit about the inconsistencies with the carer payment system and the Client Incident Management System</li> <li>Continues to develop a data quality statement</li> <li>Continues to develop a data quality management plan</li> <li>Ensures its data governance documents clarify roles and responsibilities and ensure that accountable officers are responsible for managing data quality</li> <li>Determines and advises the government on the fit-for-purpose and contemporary data</li> </ol>	<p>1.a) DFFH (the department) has undertaken an initial assessment of the data quality in the CRIS and CRISP systems. It will undertake reassessment of data quality as required and at least annually, in order to determine any data quality concerns. It will continue work to strengthen the carer payment system and the Client Incident Management System.</p> <p>1.b) The department has produced a first draft of the data quality statement and will continue working on the statement for completion by the end of September 2022. The statement will be updated in future alongside reassessments of data quality.</p> <p>1.c) The department is developing a data quality management plan, with actions</p>	<p>1.a) 31 March 2023</p> <p>1.b) 31 December 2022</p> <p>1.c) 31 December 2022</p>

**OFFICIAL**



	<p>management system it needs to manage all aspects of its child protection data</p> <p>f. Assesses, updates or revises (where necessary) and documents its child protection data quality controls and makes this information easy for staff to access, including but not limited to:</p> <ul style="list-style-type: none"> <li>Data validation controls, such as data entry controls for mandatory fields</li> <li>Business processes</li> <li>User access controls</li> <li>Data quality controls for its enterprise payment platform to address discrepancies in child placement details (see Sections 3.1, 2.1, 2.2 and 2.3)</li> </ul>	<p>identified which will be prioritised. The management plan will be updated in future alongside reassessments of data quality.</p> <p>1.d) The data custodian has been identified as the responsible officer for data quality in the department. An oversight group has been convened to advise the custodian and oversee the development and review of the key data quality documents.</p> <p>1.e) The department is progressing a suite of digital enhancements to address the immediate deficits impacting data quality in the ICCMS system. It will also progress the longer term strategic work program to support government decision making.</p> <p>1.f) The department will convene a Working Group to assess, update, revise and document child protection data quality controls for completion by the end of the financial year.</p>	<p>1.d) 31 March 2023</p> <p>1.e) 30 June 2023</p> <p>1.f) 30 June 2023</p>
2	<p>DFFH - Undertakes a training needs analysis to understand and address current and potential gaps in child protection practitioners' knowledge and capability to appropriately use the Client Relationship Information System, including by:</p> <p>a. Documenting the outcomes of this analysis and outlining the mandatory and recommended training programs for all system users</p>	<p>The department will undertake a training needs analysis to understand the current knowledge and skills of the child protection workforce, and this will inform the training plan for CP practitioners outlined below.</p> <p>2.a) A CRIS training plan for child protection practitioners will be developed including mandatory and non-mandatory refresher programs based on the training needs analysis.</p>	<p>2.a) 31 December 2022</p>

OFFICIAL



	<p>b. Making support and guidance material easy to access</p> <p>c. Defining training requirements for the Client Relationship Information System for Service Providers for external caseworkers and regularly delivering this training</p> <p>d. Updating its departmental intranet and intranet for external service providers with a complete and accessible list of user guides, training materials and access to support for the Client Relationship Information System for Service Providers (see Section 3.2)</p>	<p>2.b) CRIS user guides for child protection and other support and guidance material for using CRIS will be available on the Child Protection Learning Hub, to be launched in September 2022.</p> <p>2.c) Work is underway to define CRISSP training requirements and provide training for external providers.</p> <p>2.d) Work is underway to find a suitable web-based location for the storing of a complete, accessible list of guides, training and support for CRISSP.</p>	<p>2.b) 30 September 2022</p> <p>2.c) 31 December 2022</p> <p>2.d) 31 December 2022</p>
3	<p>DFFH – determines and advises the government on the workforce resources it needs to:</p> <p>a. Address data quality issues and improve the quality and reliability of its child protection data</p>	<p>3.a) The Department continues to implement the Child Protection Workforce Strategy, which will support recruitment, retention and ongoing professional development of the Child Protection workforce to better manage workload.</p> <p>Based on workforce feedback and the audit findings, the department is exploring a range of additional initiatives to better support the Child Protection workforce to balance direct client work and critical case support tasks including accurate record keeping and data maintenance.</p>	<p>3.a) 30 June 2023</p>

OFFICIAL



	<p>b. After this, maintain the quality of its child protection data to ensure that it is current, complete and accurate (see Section 3.3)</p>	<p>3.b) The work program will include strategies for sustaining effort to maintain data quality, policy, learning and development activities, auditing schedules, IT support, legal support, automated responses and governance.</p>	<p>3.b) 30 June 2023</p>
--	---	--	--------------------------

OFFICIAL