



NTCOSS response to the Productivity Commission's Inquiry into Expenditure on Children in the Northern Territory – Draft Report

December 2019

The Northern Territory Council of Social Service (NTCOSS) is a peak body for the social and community sector in the Northern Territory (NT), and an advocate for social justice on behalf of people and communities in the NT, who may be affected by poverty and disadvantage.

NTCOSS has a broad membership base, which is made up of non-government (NGO) and community organisations, and Aboriginal Community Controlled organisations (ACCOs), as well as other organisations and individuals with a commitment to social justice issues for people and communities who are socially and financially disadvantaged in the NT.

NTCOSS welcomes the response and findings by the Productivity Commission, and is largely supportive of the draft recommendations. In particular, NTCOSS supports the Commission's position that recommendations need to strike a balance between improving coordination and maintaining some continuity in an environment marked by abrupt policy changes. NTCOSS also cautions against diverting funding away from areas where overlap in government funding is identified, and recommends a focus on coordination and integration of services. As in NTCOSS' submission to the Productivity Commission's study, it is important to note that apparent duplication or overlap of service delivery may be intentional and necessary; established to offer specific or specialist support for specific groups of people, and to respond and be accountable to local need. The social, cultural and environmental heterogeneity of communities in the NT gives rise to distinct and complex needs across and within communities. A nuanced approach is needed to understand the context(s) in which services are being delivered when analysing service delivery across the NT.

NTCOSS notes that in the interests of practicability and in order to not overstate the level of expenditure relevant to the prevention of harm to children, the focus of this study was on tertiary and secondary services. While appreciative of the validity of this approach, NTCOSS takes the position that unless greater efforts are made to address poverty, efforts to address harm to children will be undermined. In particular, NTCOSS recommends that the Commonwealth Government commits to increasing Newstart and associated payments; increasing Rent Assistance, and replacing the Community Development Program with a more equitable and less punitive model such as the proposed alternative developed by the Aboriginal Peaks of the NT.<sup>1</sup>

NTCOSS reiterates the importance of investment in early intervention and prevention programs, which with appropriate resourcing have the greatest potential to achieve significant, beneficial and long term outcomes for individuals and communities.

In the interests of time, this response only discusses recommendations that are *not* supported in full by NTCOSS.

### Draft Recommendation 3.2 A public children and family service list

NTCOSS supports the need for a single, cohesive and NT-wide list of services, and agrees that improvements in the collection of expenditure data are required. NTCOSS also agrees that to meet the needs of service users, this list requires input from service providers.

In late 2017 NTCOSS was awarded funding for the development of an on-line NT Community Services Directory (the Directory). The aim of this work is to deliver an on-line directory of up-to-date, NT

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<sup>1</sup> Aboriginal Peak Organisations NT 2017, 'Developing Strong and Resilient Remote Communities: Proposal for Establishment of a Remote Development and Employment Scheme', retrieved from <https://www.clc.org.au/Remote-Employment-Program/>

human services, that is accessible and functional for use by the general public and community services sector workers.

The Directory is being developed in a phased approach:

- Phase 1 October 2017 – June 2018 - The paper-based NTCOSS NT Community Services Directory transitions to an online interactive webpage with referral criteria for relevant services added and ready for immediate use as a resource – *completed* <https://ntcoss.org.au/directory/>
- Phase 2 July 2018 – June 2020 – In consultation with stakeholders, a stand-alone NT Community Service Directory website is designed and developed – *funding recently awarded after new proposal was submitted based on consultations across the Territory, August 2019*
- Phase 3 July 2020 – June 2022 – to be completed - The stand-alone NT Community Service Directory is promoted, maintained and improved. Long term sustainability secured

Under the current plan, not-for-profit NT social service providers self-complete and manage their listing.

In the last 12 months over 32,000 individual users searched the NT Social Services Directory with 3400 of these being from the NT Government. This is significant given the current limitations of the Directory, and is indicative of need.

While the Directory could be a public children and family service list:

- it is currently restricted to NT not-for-profit social services, and needs to expand to include NT Government services, which is part of the next stage of phase 2 development. The service list is planned to be expanded to include services funded through other means and other service types (i.e. sporting clubs and community groups), and front-line Government services (such as those provided by Territory Families)
- a mobile and tablet App is required for remote and offline access and is being developed in the next stage of phase 2
- there is a role for the NT Government in managing the collection and entry of its own service provision information
- there are many specialist directories available in the NT (i.e. local Councils) that NTCOSS is working with to explore options for consolidation or development and use of a data sharing platform
- mapping of service provision in the NT would add weight to the validity of the Directory listings, which would require additional resourcing
- adequate ongoing resourcing is required to ensure sustainability of the Directory

### Draft Recommendation 6.1 Community plans and coordinated funding decisions

NTCOSS is broadly supportive of the sub-recommendations under Recommendation 6.1, including to collate community-level data on services, outcomes and expenditure, and utilising the data to develop community plans. However, in keeping with Indigenous data sovereignty principles, NTCOSS recommends a community-led data governance and ownership approach. Furthermore, to ensure that these data are not used to further marginalise and stigmatise Aboriginal people and their communities, NTCOSS recommends against publishing or otherwise making the data public. NTCOSS is supportive of public reporting of data at the regional level, such as the recently released *Story of Our Children and Young People* report by Menzies School of Health Research.

Furthermore, NTCOSS recommends that the development of Community Plans need to be led by local or regional ACCOs or local decision making groups. In order to help ensure community control, this process must be aligned with Local Decision Making processes, and community plans need to be owned and championed by local leadership.

NTCOSS also notes that data is currently drawn from sources including the Australian Bureau of Statistics (ABS) Community Profile; Australian Curriculum, Assessment and Reporting Authority (My Schools); Census, Community Profile and the Australian Early Development Census. It is recommended that data taken from sources such as the ABS need to be augmented and contextualised, as this data is often inconsistent with people's perception and experience of their own community(ies), and inconsistent self-reporting at the time of Census may impact on the accuracy of these data sources.

### Draft Recommendation 6.2 An expanded role for the Tripartite Forum

NTCOSS supports the recommendation to expand the terms of reference of the Children and Families Tripartite Forum (Tripartite Forum), to provide advice on funding arrangements.

NTCOSS members have made recommendations that in order to protect against real or perceived bias by members of the Tripartite Forum, processes should be carefully considered, including a clear understanding that the Forum is not involved in direct funding decisions.

Expanding the role of the Tripartite Forum will require additional resourcing to the Reform Management Office to facilitate the meetings.

### Draft Recommendation 7.1 Increasing certainty in funding

NTCOSS supports the recommendation to provide adequate time and resources for service providers to establish their operations and improve service quality and outcomes. Service agreements and contracts need to provide protection to providers against increased costs of doing business, including Consumer Price Index and Industrial Relations (IR). Examples of IR could include award-based changes including rates of pay and penalty rates.

As acknowledged in the draft report, there is a risk that longer term contracts may act as a barrier to smaller Aboriginal Community Controlled organisations. NTCOSS recommends that this recommendation explicitly acknowledges the process of transition to ACCOs, in order to provide certainty to existing providers whilst encouraging the development of local ACCOs. Furthermore, NTCOSS recommends that the milestones for transition be written into legally binding contracts as measurable outcomes, and that contractual instalment payments are directly linked to these outcomes. Outcome key performance indicators should be designed to ensure that transition occurs within the agreed timeframe, in a staged manner that allows for ongoing acquisition of capacity.

### Draft Recommendation 7.2 Increasing certainty in the contracting process

NTCOSS supports this recommendation in principle. Standardisation of expressions of interest and requests for tender processes and criteria across Commonwealth and NT Governments would contribute to improving contracting processes.

However, NTCOSS recommends that a default period of six months would be more appropriate for providers to prepare considered responses to funding opportunities, as it would give organisations sufficient time to consult with Boards and other stakeholders at the community and regional level. It

would also allow local providers to partner to enable regional approaches that contribute to service scale without sacrificing local control.

NTCOSS recommends that the Productivity Commission make a recommendation that the proposed Aboriginal Contracting Framework is finalised and implemented.

### Draft Recommendation 7.5 Transition to Aboriginal controlled service delivery

NTCOSS members have raised concerns that this draft recommendation privileges characteristics and capabilities, including cultural competence and connection to communities, over Aboriginal community control. NTCOSS acknowledges the complexity of measuring these characteristics and capabilities, and recommends that frameworks for assessing cultural capability of organisations are developed, but cautions against placing assessment of these with the Commonwealth and NT Governments.

NTCOSS supports the recommendation that where an ACCO is expected to deliver better outcomes, but lacks the capacity to effectively deliver services, that the services should be delivered in partnership with clearly defined succession plans and timeframes. However, NTCOSS recommends that the ACCO and community be active participants in determining the composition of this partnership, rather than the Commonwealth and NT Governments driving the development of the partnership.

The report acknowledges the need for funding arrangements that support the development of ACCOs, and NTCOSS recommends that this should extend to the development of formal consortium arrangements between ACCOs and non-Indigenous organisations (to provide a legal framework for the relationship). In some instances, funding should also be made available to develop and incorporate ACCOs where none exist.

As recommended in NTCOSS' submission to the Productivity Commission's study, in order to build the capacity of local/regionals ACCOs, it is essential to invest in genuine partnerships that adhere to the Aboriginal Peak Organisations of the NT partnership principles.

### Draft Recommendation 9.2 Independent oversight of reforms

NTCOSS supports the recommendation for independent oversight of the reforms, however given that the reforms apply to both the NT and Commonwealth governments, NTCOSS recommends that this role sits with an auditor or body with authority at both the NT and National level. The role of the NT Office of the Children's Commissioner should continue to focus on supporting and protecting vulnerable children.

In keeping with the role of the Tripartite Forum in monitoring the impact of the Commonwealth-NT Coordinated Funding Framework, NTCOSS recommends that the responsible body should report to the Tripartite Forum.