

City of Whittlesea

Submission to the Productivity Commission Human Services Inquiry

July 2017

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Introduction

The City of Whittlesea welcomes the opportunity to make a submission to the Productivity Commission's consultation on its draft report, *Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services*.

The City of Whittlesea is one of Melbourne's ten outer-metropolitan Interface Councils. We are located on Melbourne's metropolitan fringe, approximately 20km north of the central business district. Covering 490 square kilometres, it is a large municipality with established urban, growth and rural areas. The Wurundjeri Willum people are the original inhabitants of the area and are the traditional owners of this land.

The City of Whittlesea is experiencing rapid population growth: In 2017 the estimated resident population of the City of Whittlesea is 209,118, which is expected to grow to 379,342 by 2041 – an 81.4 per cent increase.¹ We are the third fastest and largest growing municipality in Victoria and the fifth largest in Australia.² Our area has been endorsed by the Victorian Government as a growth area of metropolitan significance.

Our rapid population growth presents significant challenges including that demand for social, health and human services far outpaces availability. In understanding our response to this inquiry, it is important to note the historical under-investment and lack of timely infrastructure delivery in growth municipalities and the detrimental impacts on the wellbeing of our communities this has resulted in.³

We address three areas in our submission:

1. End of Life Care

The City of Whittlesea is the municipal planner of aged care across residential and community aged care services. We lead processes and networks within the municipality to facilitate integration and coordination of services aimed at cohesive service delivery for people living at home. We have a Positive Ageing Strategy adopted by Council in 2016 to address the needs of our emerging older population. We undertake work around enhancing social connections and participation in local

¹ forecast.id (2016), *City of Whittlesea Population Forecasts*. www.forecast.id.com.au/whittlesea [accessed July 2017].

² Australian Bureau of Statistics, *Regional Population Growth, Australia, 2014-15 (cat. no. 3218.0)*, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/3218.0>

³ See for example, Parliament of Victoria, Outer Suburban/Interface Services and Development Committee, *Inquiry into Liveability Options in Outer Suburban Melbourne*, December 2012; Parliament of Victoria, Outer Suburban/Interface Services and Development Committee, *Inquiry on Growing the Suburbs: Infrastructure and Business Development in Outer Suburban Melbourne*, June 2013; Victorian Auditor-General's Report, *Developing Transport Infrastructure and Services for Population Growth Areas*, August 2013; Essential Economics, *One Melbourne or Two? Implications of Population Growth for Infrastructure and Services in Interface Areas*, March 2012.

community life for older people. We receive significant Commonwealth funding to undertake this work as well as commit our own funding.

2. Social Housing

The City of Whittlesea actively supports and facilitates the provision of appropriate and accessible social and affordable housing. Council plays a pivotal role in facilitating and encouraging diversity of housing developments in order to promote a wide range of quality dwelling types, forms and styles targeted to the needs of households at different life stages and income levels.

Council's Social and Affordable Housing Policy and Strategy (adopted 2012) responds to a shortage of social and affordable housing in the municipality and aims to encourage and facilitate the provision of affordable, accessible and appropriate housing for very low, low and moderate income household groups. In particular it aims to increase the supply of social housing, including crisis and emergency accommodation, to house the most vulnerable and very low income households.

The City of Whittlesea recognises that every person has a right to affordable, adequate and appropriate housing to enable their participation and sense of belonging in community life. Diverse, available and suitable housing contributes to a community's capacity to sustain local economies with a range of services and businesses, prospering in an efficient, sustainable and equitable way. Unmet housing need is a significant driver of disadvantage: without stable, affordable housing people lack a foundation to improve their life circumstances.

3. Family and Community Services

The City of Whittlesea works closely with the community and a range of external service providers and interest groups to provide and support a variety of services, programs, events and facilities. The aim of these services is to build resilient communities that can maximise their potential and assist these communities to be healthy, resilient and independent. To enable this, we perform a number of functions:

- Research and policy development
- Direct service provision
- Community engagement
- Service and facility planning
- Facility management and development
- Partnerships with other agencies and the community.

We provide a number of services, public spaces and infrastructure for children, young people and their families including:

- Maternal and Child Health services
- Central enrolment four year old kindergarten
- Playgroups
- Family Day Care
- Youth Services
- Calendar of education and training for professionals, parents and carers

- Immunisations
- Planning and policy development
- Sporting facilities
- Playgrounds
- Parks.

We facilitate a range of partnerships, strategic networking opportunities and professional development that supports others providing services for children, young people and their families.

We also work with, and on behalf of community to generate evidence, consult and advocate for physical infrastructure and vital services responsive to our growing population's need.

Response to Recommendations

General Feedback

We have a number of general comments relevant to the draft report and recommendations:

- The proposed reforms towards increased consumer choice and competition will change the dynamics of the system in ways that we may not be able to anticipate, and will require strong stewardship for a successful change process. The report acknowledges the need for system stewardship yet does not reflect a robust approach or understanding of the nature of stewardship which is vital to successful human system outcomes.
- The report and recommendations do not acknowledge the range of choice approaches and different consumer priorities/capacities to exercise choice. It therefore appears that the recommendations relating to choice may be based on simplistic assumptions.
- There are many different mechanisms for increasing competition and certain mechanisms are more appropriate to particular service types, client groups, regional locations, market maturities and service systems. There needs to be a stronger understanding of what competition mechanisms are appropriate to each specific sector.
- There should be greater acknowledgement of system changes and priorities for different segments in the community which require tailored service responses (for example, social housing needs of older women).

End of Life Care

DRAFT RECOMMENDATION 4.1

State and Territory Governments should ensure that people with a preference to die at home are able to access support from community-based palliative care services to enable them to do so. To achieve this, State and Territory Governments should:

- assess the need for additional community-based palliative care services
- design services to address identified gaps in service provision
- use competitive processes to select providers (or a single provider) to deliver additional community-based palliative care services
- monitor and evaluate the performance of community-based palliative care services to ensure that those services deliver integrated and coordinated nursing, medical and personal care, and provide access to care and support on a 24 hours a day, 7 days a week basis
- ensure that consumer safeguards are in place so that quality care is provided, and oversight is maintained, as the volume of services provided increases.

We support this draft recommendation subject to feedback on factors that will be important to successful implementation. We support this recommendation because:

- It reflects the paper's discussion that lack of services and funding are the key issues with End of Life Services (EoLS) currently.
- The service design issues identified result in lack of suitable choice for people and represents, together with lack of service volume, a barrier to dying with dignity.

Our feedback for successful implementation is that:

- There should be a clear articulation of the desired outcomes relating to EoLS as part of the aged care system. Assessing service needs, designing services and evaluating performance should all be undertaken within a clear understanding of desired outcomes relating to EoLS.
- The proposals to apply competitive processes, monitor and evaluate services and to establish consumer safeguards are legitimate goals. However, research is required to examine the success of national and international outcomes where these approaches have been applied. Significant work is also required to define the competitive scope, structures and mechanisms as well as the character of this oversight before competitive services can be confidently implemented with limited risk to consumers. Learning from previous competitive processes for services with Commonwealth oversight demonstrates these functions have not been consistently successful (e.g. Residential aged care).

DRAFT RECOMMENDATION 4.2

The Australian Government should:

- remove current restrictions on the duration and availability of palliative care funding in residential aged care so that palliative care is available to residents who have pre-existing high health care needs, and for periods of time that align with those provided in the health care system
- provide sufficient additional funding to residential aged care facilities to ensure that people living in residential aged care receive end-of-life care that aligns with the quality of that available to other Australians.

We support this draft recommendation. It will make available EoLS that is not currently accessible for many residential aged care residents. The importance of consumer safeguards to ensure quality care and oversight is relevant to the introduction of funding to support EoLS in residential aged care settings – including for public, for-profit and not-for-profit. This is emerging as a fundamental issue as choice and competition increases across human services.

DRAFT RECOMMENDATION 4.3

The Australian Government should promote advance care planning in primary care by:

- including the initiation of an advance care planning conversation as one of the actions that must be undertaken to claim the '75 plus' health check Medicare item numbers. At a minimum, this would require the general practitioner to introduce the concept of advance care planning and provide written material on the purpose and content of an advance care plan
- introducing a new Medicare item number to enable practice nurses to facilitate advance care planning.

We support this draft recommendation.

DRAFT RECOMMENDATION 4.4

The Australian Government should amend the aged care Quality of Care Principles to require that residential aged care facilities ensure that clinically trained staff hold conversations with residents about their future care needs. This should include helping each resident (or their family or carers) to develop or update an advance care plan (or to document that the resident would prefer not to complete an advance care plan) within two months of admission to the facility.

We support this draft recommendation.

DRAFT RECOMMENDATION 4.5

The Australian, State and Territory Governments should ensure that there are sufficient data to enable governments to fulfil their stewardship functions by monitoring how well end-of-life care services are meeting users' needs across all settings of care.

Governments should work together to develop and implement an end-of-life care data strategy that leads to the provision of, at a minimum, linked information on:

- place of death
- primary and secondary diagnoses
- details of service provision at time of death (what, if any, health or aged care did they receive, at what level and for how long)
- whether they had an advance care plan.

We support this draft recommendation. However, the more vital issue is about defining the nature of the stewardship required to successfully implement informed consumer choice and competition. Where choice and competition are introduced with objectives of consumer satisfaction, innovation and effectiveness, the service system increasingly becomes a number of separate parts constantly seeking organisational or individual success. The Productivity Commission should make a specific recommendation on the nature of the stewardship required for reform success. Elements include stewardship purpose, functions, responsibilities, and the scope of authority required to ensure a system consisting of individually motivated elements has the capability to deliver consistent, equitable and sustained outcomes.

Social Housing

The City of Whittlesea response concentrates on matters regarding Council's extensive experience as a facilitator and responsible planning authority relating to housing and the creation of liveable neighbourhoods. Although not a housing provider, Council recognises it can undertake a number of roles and responsibilities in relation to facilitating the provision of social and affordable housing.

With respect to the draft recommendations provided, limited resources (financial) and pressure on the housing market means innovative and collaborative thinking is needed to address the complexities of social and affordable housing provision.

The City of Whittlesea notes each draft recommendation has merit and warrants further exploration. Our general feedback is that:

- There needs to be a clear link made between social / affordable housing policies and provision with broader social and economic development.
- There needs to be greater acknowledgement of living affordability issues. Living affordability refers to the combination of housing costs and other living expenses for households, such as the costs of transport, energy and water utilities. Some of these costs for households vary depending on where people live. This is especially the case for the relationship between housing, transport and access appropriate services.

DRAFT RECOMMENDATION 5.1

The Australian Government should enhance Commonwealth Rent Assistance (CRA) by:

- extending CRA to cover tenants in public housing
- increasing the current maximum CRA payment by about 15 per cent to address the fall in the relative value of CRA caused by average rents rising faster than the consumer price index since 2007
- indexing the maximum CRA payment amount to reflect changes in rental prices nationally.

We support this draft recommendation but emphasise that levels of payment need to be linked to an affordability target. City of Whittlesea local data reveals:

- In the outer urban areas of Melbourne, people in receipt of rent assistance are occupying the majority of the private rental properties.
- A trend that very low income households are seeking rental housing in the outer urban areas of Melbourne.
- The highest number of people receiving rent assistance are people in receipt of Disability Support Pension, Parenting Payment Single, Family Tax Benefit A, Newstart Allowance and the Age Pension.

DRAFT RECOMMENDATION 5.2

State and Territory Governments should abolish the current assistance model for social housing where rents are set at a proportion of the tenant's income and enhance user choice by:

- providing a high-cost housing payment funded by State and Territory Governments for eligible tenants, such as those with a demonstrated need to live in a high-rent area
- delivering the high-cost housing payment to the tenant in a way that would enable it to be used in either the social or private rental markets
- offering existing tenants in social housing an option between continuing to pay rent set at a proportion of their income for up to ten years, or electing to move to the new assistance model
- charging market rents for tenants in social housing

This draft recommendation has merit and warrants further exploration. We provide the following feedback:

- The City of Whittlesea has a high population of low income households. This points to a need for a range of housing options with different costs to ensure affordable housing and affordable living.
- Changes to the current assistance model for social housing need to be flexible and acknowledge that many low-income households are experiencing other forms of disadvantage.

We note that the overall low proportion of social housing, including public and community housing, means that the private rental market is the only 'tenure of choice' for many low income households. However, there has been a long-run decline in the number of affordable rental dwellings in the City of Whittlesea. The housing affordability trends for the City of Whittlesea combined with the low proportion of public rental stock in the area indicates the increasing importance that private rental support programs will assume for low income households into the future.

DRAFT RECOMMENDATION 5.4

State and Territory Governments should continue to make the management of social housing properties contestable, on a staged basis. The management of social housing properties should be subject to a tender process that is open to all providers, including the government provider.

This draft recommendation has merit and warrants further exploration. We provide the following feedback:

- Implementation of the proposed management and tender process requires a responsive and strengthened independent monitoring and reporting system.
- Implementation should consider best practice and key learnings from states and territories. For example, the *Housing Act 1983* (Vic) includes details of registration criteria and how applications are assessed.

DRAFT RECOMMENDATION 6.1

When commissioning tenancy support services, State and Territory Governments should:

- clearly separate the funding and commissioning of tenancy support services from tenancy management services
- ensure that tenants renting in the private market have the same access to support services as tenants in social housing.

This draft recommendation has merit and warrants further exploration. We emphasise that the following is important to successful implementation:

- Timely, relevant and responsive tenancy support services are paramount.
- There should be participation of individuals and households who access tenancy management services in the co-design of targeted and integrated support services aimed at protecting, promoting and enabling sustained health and wellbeing outcomes for tenants.
- There must be strong accountability and transparency embedded into commissioning processes – as is standard in all government grant and fund giving processes and equally important in this context.
- Innovative support service models of housing should be supported, including models that allow for multiple social benefits from one organisation and have increased opportunities for tenants (eg, work, study, participation in community life).
- Barriers to accessing the private rental market need to be addressed including by private rental support programs.
- Discrimination and selective sorting of tenants needs to be addressed, including the role of real estate agents. City of Whittlesea stakeholders report the following:
 - Ongoing challenge of how best to present low income households as a suitable tenant.
 - It is particularly difficult for the tenant to compete with other households when there is no rental history, particularly young people, women escaping domestic violence and new arrivals.
 - The real estate agent has a significant say in who accesses private rental by assessing, selecting and recommending prospective tenants to the landlord.
 - There are a small proportion of landlords who refuse to rent their house to those who receive income support benefits.
 - Lower income tenants without good rental histories were considered by real estate agents to have a better chance of accessing an older property that is “a bit run down that nobody wants to rent”.

DRAFT RECOMMENDATION 6.2

State and Territory Governments should ensure that the entity responsible for managing social housing assets is separate from the entity responsible for social housing policy. The entity managing social housing assets should be subject to competitive neutrality policies.

This draft recommendation has merit and warrants further exploration. We provide the following feedback: The Victorian Auditor General's Report on Managing Victoria's Public Housing (2017) includes useful guidance on managing financial sustainability, ageing stock, misalignment of stock with demand and dealing with growing demand. The release of *Homes for Victorians* in March 2017 represents an important step toward growing social housing supply in Victoria, but it will need to be supplemented by a long-term plan for public housing that aims to improve supply, sustainability and DHHS' ability to meet demand.

DRAFT RECOMMENDATION 6.3

State and Territory Governments should ensure that applicants for social housing assistance:

- receive a comprehensive up-front assessment of their eligibility for: a social housing placement; the high-cost housing payment (draft recommendation 5.2); and tenancy or other service support, including support to enable the tenant to choose their home
- are made aware: that the high-cost housing payment would be payable if they chose to live in either the private or social housing markets; and of the extent to which support services available in social housing would also be available in the private market.

This draft recommendation has merit and warrants further exploration. We suggest that more detail be provided on the entity responsible for overseeing the eligibility assessment.

DRAFT RECOMMENDATION 6.4

State and Territory Governments, in conjunction with the Australian Institute of Health and Welfare, should improve the data that are collected on:

- the efficiency of social housing
- tenant outcomes, including high-cost housing payment and service recipients who choose to rent in the private housing market.

State and Territory Governments should clearly define the outcomes they are seeking to achieve to support the commissioning of tenancy management and tenancy support services, and put in place frameworks to assess their success in meeting these outcomes over time. Outcomes data should, to the extent possible, be consistent and comparable to that developed for family and community services (draft recommendation 7.3).

This draft recommendation has merit and warrants further exploration. We provide the following feedback:

- Ethical data collection and management, and accountability and transparency is critically important.
- 'Efficiency' is important but does not outweigh the fundamental principle that providing quality, secure and affordable housing is the most fundamental preventative approach to addressing disadvantage.
 - Housing is a basic human need that contributes to individual and community safety and wellbeing.
 - Every person, regardless of their age, culture, gender, race, religion or sexual preference, has a right to affordable and appropriate housing to enable their participation in community life.
 - Affordable housing should be in locations accessible to appropriate services and facilities for a range of households.
- Potential outcomes to capture include:
 - Tenant experience: eg, positive lifestyle choices, increased independence
 - Children's experience: eg. Improved personal wellbeing, relationships, family life, education (stable household).
 - State and territory experience: eg. reduced justice / health costs
- Data should be sex aggregated and regularly reviewed and updated.

DRAFT RECOMMENDATION 6.5

State and Territory Governments should:

- publish information on expected waiting times to access social housing, by region, in a format that is accessible to prospective tenants
- make publicly available the regulatory reports on the performance of community providers that are undertaken as part of the National Regulatory System for Community Housing.
- To facilitate choice-based letting, State and Territory Governments should publish information on available social housing properties, such as the rent charged for the property, number of bedrooms and the location of the property. This information should be disseminated across a range of mediums, such as online and printed leaflets.

This draft recommendation has merit and warrants further exploration as part of a suite of tools available to local, State and Territory Governments, community housing providers and tenants (prospective).

Family and Community Services

DRAFT RECOMMENDATION 7.1

The Australian, State and Territory Governments should work together to develop and publish:

- data-driven maps of existing family and community services
- analysis of the characteristics and needs of the service user population to assist with system and program design and targeting
- service plans to address the needs of people experiencing hardship.

We support this draft recommendation.

Data sources:

Local governments have a wealth of knowledge and information about their communities to contribute to this analysis. They have connection with networks and communities within their municipality through their staff, which can support two-way information sharing with the community. Councils also produce written resources about their community that provide details crucial to planning for service delivery. For the City of Whittlesea, this includes:

○ Place Profile Report:

The Place Profile Report provides a demographic profile of geographic areas in the municipality. It outlines an understanding of the communities within the municipality by providing a collection of statistical data on current residents and population forecasts for each place. The report includes information on:

- key demographic summaries
- population forecasts
- health, wellbeing and recreation
- socio-economic factors
- community perceptions.

○ Annual Household Survey:

The City of Whittlesea's annual household survey gathers information from a representative sample of households throughout the municipality on topics such as:

- cultural and leisure activities
- environmental concerns
- transportation
- computer ownership and internet access
- shopping trends.

○ Community Wellbeing Indicators Report

The City of Whittlesea's Community Wellbeing Indicators Report contains a wealth of data that provides detailed insight into the wellbeing of its fast-growing and diverse community.

All reports can be accessed here:

<https://www.whittlesea.vic.gov.au/about-us/our-city/research-reports/>

Service approach:

In addition to supporting individual service users the City of Whittlesea also encourages a family strengthening approach; supporting a whole family in their unique context, by putting the family and its members at the centre of policy, planning and practice.

This approach acknowledges that families have a significant influence on a child and young person's learning, development and wellbeing and can be a key determinant to achieving optimal outcomes for children and young people. Therefore by strengthening the family, a sustainable support system is provided for the individuals within it.

The ecological perspective⁴ acknowledges that the health, development and wellbeing of children and young people, and the functioning of their families, is shaped by environmental factors. The factors that impact on positive development of children and young people are illustrated below.

The ecological perspective



⁴ Brofenbrenner, U. (1979) *The Ecology of Human Development: experiments in nature and design*. Harvard University Press, Cambridge.

A holistic approach is required within service design and delivery to centre on families and actively strengthen their capacity; taking the approach that every contact with a family member is an opportunity to strengthen families, to educate, support, help them access services and link them into their community.

Addressing the needs of people experiencing hardship:

The City of Whittlesea acknowledges a broad definition of vulnerability as being relevant within a growth/interface Council context. Vulnerability includes social and geographic isolation, family violence, financial pressure, food insecurity, mental health, and being time poor. It strongly recommends a similar broad definition of vulnerability be adopted for family and community services.

Children, young people and their families in the City of Whittlesea are resilient and have many strengths, but at times a significant number face multiple and complex challenges that can negatively impact their health, learning and social outcomes. Many families experiencing challenges also report they are often experiencing multiple challenges at the same time. The challenges families are facing can be complex and compounding.

"I love living in Epping. We struggle every day to make time for the family and to make ends meet."- Parent

"Stress is the main thing families discuss with me. Everyday life problems, money stress etc."- Service provider

Families need improved local social and physical infrastructure for all ages and all life stages to enable them to spend more time together. This means local jobs, schools, public transport, better roads and health and human services. They also need access to local services and programs with capacity and flexibility to support the complex needs of children, young people and their families.

DRAFT RECOMMENDATION 7.2

The Australian, State and Territory Governments should adjust provider selection processes in family and community services to reflect the importance of achieving outcomes for service users.

Governments should:

- design selection criteria that focus on the ability of service providers to improve outcomes for service users
- not discriminate on the basis of organisational type (for-profit, not-for-profit and mutual for example)
- allow sufficient time for providers to prepare considered responses (including the development of integrated bids across related services).

We support points one and three of this draft recommendation (and have no feedback about discrimination on the basis of organisational type).

The City of Whittlesea strongly supports governments and providers building a better understanding of users and their needs, putting users at the centre of service provision, and an outcomes focus.

To implement this, selection criteria that support service providers to improve outcomes for service users are fundamental. In addition, flexibility to respond to individual needs and circumstances will significantly improve the outcomes for the service user and their family.

Examples of outcomes focused work at the City of Whittlesea that are recommended to be considered are set out in the table below.

| | |
|--|--|
| <p>Capable families</p> | <ul style="list-style-type: none"> • Support parents and carers to have more confidence and skills to help their family, and to understand the development of their children and young people. • Provide support during transitions as children and young people move through life stages. • Support early detection of vulnerable children, young people and their families who are at risk and link them to supports. |
| <p>Connected families</p> | <ul style="list-style-type: none"> • Support social connections between families and their community. • Connect families with local services, including Maternal and Child Health, kindergartens, long day care centres, family day care, playgroups, schools and youth services. • Facilitate a range of affordable and accessible activities and events for the whole family to participate in. |
| <p>Self-determination</p> | <ul style="list-style-type: none"> • Work within a strengths based approach, acknowledging families are well placed to know what support they need and when they need it. • Work with families to identify and provide the information, programs and/or services they need to get the best outcomes for their families. |
| <p>Integrated service system</p> | <ul style="list-style-type: none"> • Improve service integration, coordination and awareness with local service providers and improve referral pathways. • Strengthen workforce development and support staff to apply the Family Strengthening practice and principles within all services in the service continuum. |
| <p>Social and physical infrastructure</p> | <ul style="list-style-type: none"> • Ensuring better local social and physical infrastructure so that families can spend more time together. This means local jobs, schools, public transport, better roads and access to local health and human services. |

Limited timeframes for tenders can limit innovation, partnership opportunities and the ability of service providers to respond to funding opportunities. All of which reduces outcomes for individuals, families and community. Therefore allowing sufficient time for tender processes is crucial.

DRAFT RECOMMENDATION 7.3

The Australian, State and Territory Governments should prioritise the development of user-focused outcome measures for family and community services — indicators of the wellbeing of people who use those services — and apply them consistently across all family and community services. Governments should also identify outputs from family and community services that can be used as proxies for outcomes or measures of progress toward achieving outcomes.

In developing outcome measures and outputs, governments should define the indicators broadly so they can be used in provider selection, performance management and provider, program and system-level evaluations across the full range of family and community services.

We agree in principle with this draft recommendation.

It is vital that there is flexibility to respond to individual user needs and consideration of the local context is encouraged and facilitated. As outlined above, measures including family strengthening, co design, self-determination and integrated service delivery are to be encouraged.

DRAFT RECOMMENDATION 7.4

The Australian, State and Territory Governments should improve systems for identifying the characteristics of service delivery models, service providers, programs and systems that are associated with achieving outcomes for the people who use family and community services. To achieve this, governments should:

- monitor the performance of providers of family and community services in achieving outcomes for service users
- evaluate service providers, programs and systems in ways that are commensurate with their size and complexity
- proactively support the sharing of data between governments and departments, consistent with the Commission's inquiry report Data Availability and Use
- release de-identified data on family and community services to service providers and researchers
- develop processes to disseminate the lessons of evaluations to governments and
- service providers.

We support this draft recommendation.

DRAFT RECOMMENDATION 7.5

The Australian, State and Territory Governments should set the length of family and community services contracts to allow adequate time for service providers to establish their operations, have a period of stability in service delivery and for handover before the conclusion of the contract (when a new provider is selected).

To achieve this the Australian, State and Territory Governments should:

- increase default contract lengths for family and community services to seven years
- allow exceptions to be made, such as for program trials which could have shorter contract lengths
- provide justification for any contracts that differ from the standard term
- ensure contracts contain adequate safeguards to allow governments to remove providers in any cases of serious failure.

We strongly support this draft recommendation.

DRAFT RECOMMENDATION 7.6

The Australian, State and Territory Governments should provide payments to providers for family and community services that reflect the efficient cost of service provision.

We support this draft recommendation subject to the principle that efficiency of cost must include a holistic, lifelong approach of the benefits of investing early in a child's life.

We can build a better future for children, young people and their families by investing in strengths based prevention and early intervention for all families, including vulnerable families. Evidence indicates that place based strategies have a greater capacity for local relevance, community building and supporting children, young people and their families.

'The evidence is overwhelming-the early years matter' Research shows the life long social and economic benefits to children, families and the broader community of investing in early childhood.

*'A good childhood sets a child up for life, leaving them more likely to be healthy, to form positive relationships, to learn and to be in employment in adulthood.'*⁵

Evidence shows that services tailored to individual family circumstances can significantly improve the parenting experience and a child's long-term health, development and success in life.

Resourcing and delivering of universal services should be allocated in response to need.

⁵ Department of Health and Human Services, *Roadmap for Reform; strong families, safe children*, 2016, ii.

DRAFT RECOMMENDATION 7.7

The Australian, State and Territory Governments should:

- train staff to increase their capacity to implement outcomes-based approaches to commissioning and relational approaches to contract management
- trial relational approaches to contract management in family and community services.

We support this draft recommendation. The City of Whittlesea encourages innovation in contract management approaches that place importance on improved outcomes for, and increased responsiveness to, individuals, families and communities.

The City of Whittlesea supports regional and local business and is committed to buying from businesses that are physically located within the municipality where such purchases may be justified on Value for Money grounds. A similar approach is recommended to be considered, as benefits for local communities, economically and socially can be significant.

As outlined in our response to 7.2 The City of Whittlesea supports co-design, self-determination, family strengthening and integrated service delivery.