

**Our reference:** ADM/6339  
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15 July 2008

The Hon Jenny Macklin MP  
Minister for Families, Housing, Community Services and Indigenous Affairs  
c/o Australian Department of Families, Housing, Community Services and Indigenous Affairs  
PO Box 7576  
Canberra Business Centre ACT 2610

Dear Minister

Thank you for the opportunity to comment on your proposals for a national framework for the protection of children.

### **Our experience in child protection matters**

This office has a wide range of functions, with jurisdiction to scrutinise the operations of both government and non-government agencies. In particular, we have responsibility for monitoring and reviewing the delivery of community services. These services include those provided and funded by the Department of Community Services (DoCS) (this State's child protection agency) and the Department of Ageing, Disability and Home Care (DADHC) (the department responsible for supporting children with a disability).

We also have specific responsibilities to:

- Review the deaths of certain children and people with a disability. This includes:
  - children, or siblings of children, who were reported to DoCS as being at risk of harm at some time in the three years prior to their death
  - all children and young people whose deaths were a result of abuse or neglect, or occurred in suspicious circumstances
  - children in statutory care, and
  - children living in disability accommodation services.

Since December 2002, we have reviewed the deaths of 620 children and young people of whom around 90% of these deaths have involved children known to DoCS.

- Review the situation of children in care.
- Investigate and handle complaints about agencies providing community services and government services of the 56 formal investigations we finalised in 2006-07, 19 (34%) were about child protection matters. Over the past five years we have finalised around 70 investigations into child protection matters.

- Ensure that State government departments, schools, privately-run child care centres, family day care, out-of-home care (OOHC) service providers and other providers of children's services, properly handle allegations of inappropriate conduct of their employees that can affect the welfare and safety of children in their care.

We welcome the Australian Government's initiative in seeking to develop a national child protection framework and generally support the priority areas identified in the discussion paper.

We provide the following comments in light of the NSW Government's submission. We note that the final report of the Special Commission of Inquiry into child protection services in NSW is due out later this year. We made a number of submissions to the Inquiry, a number of which discuss topics relevant to the proposed national framework. In this submission we refer to the following submissions, copies of which are attached:

- Privacy and exchange of information (-Privacy submission)
- Mandatory reporting
- Out-of-home care (-OOHC submission)
- Assessment and Early Intervention and Prevention (-Assessment submission)
- Young people at risk (-Youth submission)
- Interagency Cooperation - Overcoming challenges in services delivery (-Interagency submission)
- Responding to issues of serious child protection and neglect in Aboriginal communities (-Aboriginal communities submission).

## 1. Stronger prevention focus

### *Early childhood*

We strongly endorse a stronger focus on early intervention and prevention initiatives to support vulnerable children, particularly during the early infancy and childhood periods.

To illustrate our interest in this area, it is worthwhile considering the deaths of the Aboriginal children that we review - representing around 20% of all the child deaths that we review each year. Over the past few years, around 70% of the deaths of Aboriginal children have involved infants under the age of one.

Research has shown that high quality child care is a successful intervention for improving child outcomes, including significantly enhancing the prospects of vulnerable children so that they start school on a more equal footing with their peers.<sup>1</sup> Given that entry to primary school is a critical transition point for a child, it is not surprising that high quality childcare which addresses initial disadvantage, including those associated with early learning, has been shown to be of benefit. Research also indicates that the positive effects of high quality childcare are further enhanced by the provision of other targeted services - such as home visiting and parent education programs. This is consistent with other research which emphasises the importance of programs which can address the circumstances of the child and their family within a broader community context.

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<sup>1</sup> NSW Department of Community Services (2005) *Prevention and Early Intervention Literature Review*.

Some progress has been made with the kinds of early intervention service models and intensive family based services referred to in the NSW Government's submission. However, we believe there is a need for additional early intervention programs and resources, particularly to support those families where children are at risk of entering the OOH system.

One service gap we have identified relates to families reported to DoCS who have been deemed too low a risk for a departmental response, but too high a risk to be provided a service through the NSW Brighter Futures program. While there are a small number of intensive family based services in NSW, the number is too small to meet the need. In addition, while other services might be called upon to support these families, they are generally not well placed to adequately support higher risk families.<sup>2</sup>

Against this background, we strongly support greater investment in a range of programs that target vulnerable families. As part of this investment, we believe careful consideration should be given to the Pathways for Prevention model with its strong developmental emphasis and its recognition of the benefits of a comprehensive and multi-layered response for supporting vulnerable children and families, particularly through the critical transition periods in these children's lives.<sup>3</sup>

### ***Alcohol and other substance abuse***

We agree with the discussion paper's recognition of the need to adequately respond to parental alcohol abuse, as it affects children, including unborn children. This should be extended to include other forms of substance abuse. In NSW, DoCS has estimated that, in 2004-05, between 42 and 56% of risk-of-harm reports made to the department involved carer drug and/or alcohol abuse. From our extensive child death and related child protection work, parental substance abuse has stood out as a major challenge. In particular, parental substance abuse has been present in a number of matters we have reviewed that involved the serious neglect of young infants, and many of those that involved newborns who have died before even leaving hospital.

In addition to the issues canvassed in the discussion paper, it is important to understand other ways in which substance abuse can affect the capacity of child protection authorities to respond to reports of children at risk of harm. For example, parents under the influence of drugs or alcohol may:

- be difficult to engage, seek to conceal or minimise their drug use, and behave inconsistently, making risk assessment a difficult task
- agree to change and make undertakings about their substance abuse that they may be unable to sustain, and
- be prone to relapse, making ongoing case monitoring and follow-up critical.

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<sup>2</sup> For example, there are a range of universal and targeted services which can potentially provide some support to high risk children and their families: including those funded under Families NSW, Better Futures, the Aboriginal Child, Youth and Family Strategy, the Area Assistance Scheme and the Community Services Grants Program (CSGP).

<sup>3</sup> Homel, R (2004) *The Pathways to Prevention Project: One model for working in disadvantaged communities throughout Australia* Griffith University, page 7.

From our work, it is clear that we need to have a better idea as to what constitutes best practice in responding to parental substance abuse. For example, parents with substance addictions who are looking after infants can pose a very difficult case management challenge, particularly when there is a lack of available support to the parent and infant. From our experience in reviewing the deaths of children, making wrong case management decisions can have fatal consequences. Therefore, we believe there needs to be more informed community and expert debate about this issue.

### ***Protecting children online***

The discussion paper refers to parents' responsibilities in managing any risks to their children when online. We agree that parental education is a key factor in protecting young people online and note the findings of the 2005 report, *Kidsonline@home: Internet use in Australian Homes*<sup>4</sup> which highlights the need for greater parental supervision of children's internet use and some of the challenges in achieving this.

There are currently online safety materials tailored for parents available through *NetAlert* and other sites. As it appears that many parents feel ill-equipped to supervise their children's online activity, a national framework for child protection could focus on expanding the current educational programs in this area.

We are currently undertaking a project, funded by the Australian Department of Immigration and Citizenship, regarding the vulnerabilities of young people online, including in relation to grooming for sex offences, recruitment by violent extremist groups and involvement in sites encouraging self harm and anorexia.

**We believe there are a number of additional issues to which consideration should be given for inclusion in the national framework. They are:**

- **Disability**
- **Education**
- **At risk adolescents**
- **Employment screening**

### ***Disability***

We believe that providing a stronger prevention focus in the area of disability and children should be included in the national framework. For example, there is a need to strengthen our support system for parents with an intellectual disability, and for parents with a mental illness. There is also a need to strengthen our support for parents who have children with significant disabilities.

In 2004 and 2006, we tabled special reports to Parliament outlining the findings from our investigations into DADHC's implementation of its policy for children and young people with a disability. Our ongoing work in this area suggests that appropriate supports for these families are vital to ensuring the safety and welfare of the children.

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<sup>4</sup> Prepared by NetRatings Australia Pty Ltd for the Australian Broadcasting Authority and NetAlert. April 2005 p.67 Accessible at <http://www.acma.gov.au/webwr/aba/about/recruitment/kidsonline.pdf>

Research into 407 care matters in two NSW Children's Courts during the period January 1998 to July 1999, found that just under a quarter of all cases featured parents with a disability. The researchers found that parents with a psychiatric or an intellectual disability were significantly over-represented in care proceedings, and that their children were significantly younger than children in matters involving parents without such a disability.

In our opinion, it would be a lost opportunity if the development of a national child protection framework did not encompass a strong prevention and support focus in this area.

### **Education**

From our experience, education has a critical role to play in supporting and protecting children. Over recent times, we have examined the issue of habitual non-attendance and suspension practices within the school environment. This work has highlighted the vulnerabilities and challenges relating to those children who:

- (a) habitually fail to attend school and, as a result, do not even receive a basic education
- (b) do not attend school because they have been suspended – whilst suspension constitutes a response, our investigative work would indicate that it does not necessarily deal with the underlying issues, and
- (c) might continue to attend school but there is very strong evidence that they are suffering from neglect and/or abuse. There is a risk that these children can become marginalised rather than supported within the education system and risk, over time, falling into one or both of the two categories above.

As it is our view that there is a clear intersection between the education and child protection systems, we believe that there would be merit in reflecting this in a national child protection framework. In this regard, we would be keen to see strong links between the education system and other support systems for vulnerable children and their families. In our Mandatory reporting submission, we also referred to the possibility of habitual non-school attendance of children of mandatory school age as being a potential ground for identifying a child at risk of harm. Please also see page 13 of our Youth submission.

### **Adolescence**

There is significant evidence showing that intervening in the early years of the lives of vulnerable children achieves the best results. However, under any system there will be individuals for whom adequate support was either not provided early in their life or where their vulnerabilities emerge in the period leading up to or during adolescence.

Our own child death review work illustrates the high level of risk that can be associated with adolescence, particularly for those adolescents who are most at risk. In this respect, we note particular issues pertaining to substance abuse, mental illness and homelessness as factors that can heighten the risks for young people. We support the NSW Government's position that the national framework should encompass the interests of both children *and* young people. We also acknowledge the recent work of the Federal Government in relation to the area of youth homelessness and anticipate that the response to youth homelessness will be aligned to the national child protection framework.

## **Employment screening**

We note the NSW Government's support for establishing a national approach to the screening and assessment of applicants working in child-related activities. In this regard, we would also emphasise that each jurisdiction should also ensure there are appropriate systems for investigating allegations against employees in child-related employment. We note that in this State agencies are required to investigate such allegations and report their findings to both our office and, in certain circumstances, the Commission for Children and Young People (who collect the information so that people can be appropriately assessed when applying for future employment).

## **2. Better collaboration between services**

Our experience accords with the NSW Government's observation that there are significant opportunities for improved outcomes through better integration of services, and that fragmentation, rather than duplication, occurs at all levels of the service system.

In 2001, the then Prime Minister's Youth Pathways Action Plan Taskforce report, *Footprints to the Future*, noted that there were more than 500 different youth programs in Australia that were often 'so fragmented that conflicting objectives are being pursued, resources are being wasted and...many young people are receiving only partial support and some are slipping through the cracks altogether.'<sup>5</sup>

Our experience shows that this observation is relevant to the field of 'child protection' generally. In our opinion, it would be desirable for there to be a close alignment, at least at the State and Federal level, in the core elements of the early intervention and prevention programs supported by both levels of government. In order to achieve this, it would require a cooperative approach in the planning, funding and delivery of programs. Having said this, we acknowledge work that has been carried out over recent years to improve State/Federal planning in this area. For example, there is general consistency in the objectives relating to children in the NSW State Plan, and the Council of Australian Government's (COAG) desired outcomes for children outlined in its National Reform Agenda.<sup>6</sup>

Against this background, we fully support all tiers of government and the NGO sector coming together to establish and monitor:

- **'Where things are at'** against key child welfare indicators, including developing the capacity to report against these indicators on a national, state and local basis.
- **'Where we need to go'** involving an alignment of high level federal, state, local and NGO policy and planning.
- **'What we are doing'** through a coordinated and accountable approach in relation to policy implementation.
- **'What we are achieving'** through a rigorous approach to program evaluation and ongoing reporting against the child welfare indicators which are developed.

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<sup>5</sup> page 8.

<sup>6</sup> NSW Government State Plan (2006) 6 A new direction for NSW; refer to Council of Australian Governments, *Communiqué*, for details about the Human Capital Project of the National Reform Agenda, accessed from <http://www.coag.gov.au>

In our Interagency submission we argued that a sound interagency policy framework is not enough – it must be supported by targeted resources and effective structural and governance arrangements to make sure that effective interagency practice happens on the ground. We believe that these elements are of critical importance when seeking to construct effective interagency practice within a national context.

We note the reference in the discussion paper to boosting the capacity to investigate domestic violence-related homicides to inform future practice. In this regard, we have been recently publicly reiterating our support for a domestic violence homicide unit to be established in NSW to conduct this type of activity.<sup>7</sup>

We also note that almost every State and Territory already has a body performing child death review functions. These reviews focus on identifying systemic issues relating to policies or practices that may contribute directly or indirectly to the deaths of children. They aim to identify how these issues can be addressed in order to reduce risk to children. Continued cooperation and sharing of information between jurisdictions in this area of work will be important.

Improving the sharing of child protection related information and intelligence between jurisdictions should be an important component of responding to child protection on a national basis. However, ensuring that within each State and Territory there is effective capture and use of information is also important to consider. Arrangements for sharing information and intelligence across borders will work most effectively when coupled with high quality information and intelligence collected from within each State and Territory.

Three issues that can have an impact on the effective capture and use of information are:

- (a) the reporting and assessment requirements, including the threshold for child protection reports and the efficacy of and adherence to reporting and assessment requirements
- (b) the level of adoption of intelligence-based child protection practice, and
- (c) privacy legislation and related practice around the exchange of information.

#### **(a) *The reporting and assessment requirements***

There are a significant number of issues around the reporting and assessment of child protection matters, including (but not limited to):

- the desirability of mandatory reporting
- the appropriate threshold for reporting
- the way in which reports are assessed
- providing feedback to reporters
- the ongoing obligation on certain reporters to support children notwithstanding that they have made a report, and
- the merits of distinguishing child safety reports from child wellbeing reports.

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<sup>7</sup> We originally expressed our support for this measure in a special report to Parliament, *Domestic violence: improving police practice* (2006).

We have attached our Mandatory reporting submission and look forward to Commissioner Wood's report which will outline his views on this issue.

Ultimately, how each State and Territory resolves issues around reporting and assessment within their own jurisdictions will have an impact on agencies' ability to work collaboratively, particularly in relation to cross border initiatives involving the exchange of information. Therefore, while we acknowledge that debates across the country are likely to continue around what constitutes best practice in these areas of child protection, we believe it will be important to seek to gain some consensus on these issues, at least in the longer term.

**(b) Intelligence-based practice**

We believe that intelligence-driven child protection practice should be integral to any child protection system and that this should be reflected in the proposed national framework. In our Assessment submission, we made the following observations for consideration by Commissioner Wood.

In NSW over recent years, DoCS has been undertaking significant work in relation to analysing the frequency and nature of the reports it receives. For example, their data indicates that 11% of sibling groups generate close to 50% of the total reports received by the department. In this regard, DoCS's research has shown that in 2005-06, 50% of the 241,003 risk of harm reports made to DoCS related to around 7,200 sibling groups.<sup>8</sup>

We are also aware of research the department has undertaken in relation to re-reporting rates for Aboriginal children, as well as other work around the characteristics of particular types of reports. This type of analysis can be beneficial from both a policy and practice perspective.

However, while we understand that local community service centres (CSC) will have some idea as to the high risk families within their area, there is nothing in place to ensure that there is a systematic collection and analysis of the information obtained from child protection reports to identify these families. The department's own research demonstrates why it is essential that each CSC is fully aware of the relatively small percentage of families within their area who generate approximately half of the reports received.

By way of contrast, it is worthwhile considering the policing profession. Like DoCS, police receive hundreds of thousands of reports each year. Police data also demonstrates that there are a limited number of individuals and sub groups within our community who commit most of the crimes.

Over the past 10 to 15 years, the policing profession has changed dramatically in terms of how it carries out its business of crime reduction and prevention. Increasingly, police have used their information holdings to drive their operational practice.

In particular, the police use their information systems to assist in identifying patterns of criminal activity and the high risk offenders who are behind much of this activity. From the corporate level down to the local level, the data is analysed and then applied to inform the deployment of police resources.

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<sup>8</sup> Data reported in a presentation to the Australasian Conference on Child Abuse and Neglect, *Breaking Down the Barriers between Prevention, Early Intervention and Child Protection*, 31 October to 2 November 2007.



If we take domestic violence matters as an example, police use their data holdings to develop profiles of both high risk offenders and high risk victims. Informed by these profiles, police can then make evidence based decisions about which matters should be prioritised, and what kinds of crime prevention strategies should be employed.

This shift by police towards a much more sophisticated intelligence based practice provides a blue-print for DoCS. Some of the excellent data analysis which DoCS has already carried out supports this proposition.

Such practice would allow the department to better utilise the vast amount of information it receives to make more informed decisions about those who are most in need of support. Intelligence driven child protection practice would also allow better identification of many of those families who require a coordinated interagency response.

In order to develop intelligence based practice, the department would need to provide its frontline staff with the capacity to run reports which identify families subject to multiple reports. A further prerequisite for the development of more intelligence based practice would involve providing frontline staff with the reporting tools that provide real time, consolidated child protection history reports. On this issue, we would note that, as an organisation with an operating budget of around \$22 million, the Ombudsman's IT system can quickly provide us with consolidated police officer histories which draw on data holdings from five separate police databases.

Given that DoCS is projected to receive around 300,000 risk of harm reports this financial year, and that holistic assessments are integral to effective child protection practice, it is essential that the department be provided with the necessary funding to enhance the utility of its information system in this way. Under the current KiDS system, for a user to apprise themselves of a family's child protection history, they may need to spend hours navigating their way through numerous data fields. We note that the department's submission refers to the development of its Corporate Data Warehouse. For the reasons we have outlined, we fully support this initiative, as it has the potential to provide the department with substantially enhanced reporting capacity.

However, in discussing intelligence based practice, it is important to also recognise that possessing the necessary IT capacity represents only one component of this type of practice. The other elements concern the need for ongoing sophisticated analysis of information holdings, and the ability to translate this analysis into well informed decisions about which families are most in need of a response and the nature of the response which should be provided. For these essential elements to be embedded in practice requires:

1. a sound intelligence policy framework
2. structural and governance arrangements capable of driving the department's intelligence practices, particularly at the corporate and local CSC levels, and
3. skilled staff at the corporate and local level dedicated to use and develop the department's intelligence practices.

### **(c) Exchange of information**

There are a number of barriers to the effective sharing of information between agencies.

In our Privacy submission, we argued that it is important to recognise that there are both legal and cultural barriers to the effective exchange of information. It has traditionally been ingrained in workers in community services that they must maintain the confidence of their clients. Unfortunately, our experience has been that too often the system as a whole fails to protect vulnerable families and children because agencies act in isolation from one another, resulting in no single agency fully recognising the circumstances that a family is experiencing.

To address the legal barriers, we proposed in the submission a three tiered system for information exchange between both government and non-government agencies within this State. The first tier would give tier 1 agencies both the ability to furnish another agency with certain information and the ability to *direct* another agency to furnish information.

The second tier would give tier 2 agencies both the ability to furnish another agency with certain information and the ability to *request* certain information from other agencies, but not *direct* those agencies to furnish that information. Instead, those agencies receiving such a request would have the ability to furnish that information at their discretion, without obtaining the consent of relevant parties, and would not be in breach of any laws in doing so.

The third tier would include agencies who only have the ability to furnish certain information to agencies *in the first and second tiers* without breaching any laws. In considering exchanging information with another tier 3 agency, these agencies would be subject to relevant privacy laws and any other laws restricting the exchange of information. However, if a tier 3 agency requested information from a tier 1 or 2 agency, the agency receiving such a request would not breach any laws if it provided that information to the tier 3 agency.

We believe that careful consideration would need to be given to what bodies should be in tiers 1, 2 and 3. However, it is our view that, at a minimum, the police, schools, health services and non-government organisations, including those providing OOHC services for children and those providing major early intervention services, should be included in tier 2.

As we believe that approaches to privacy and the exchange of information should be consistent across the nation, we would support the examination of this issue within the context of a national child protection framework. We would also note that this is another issue on which Commissioner Wood will be reporting later this year.

### **3. Improving responses for children in care and young people leaving care**

Foster carers play a critical role in any care system for children and we would support moves to strengthen the support that they receive.

In particular, there may be benefit in examining the level of financial support currently given to foster parents and the current way in which State and Federal allowances are provided.

We also agree with the NSW government's view that any national strategy should complement the strategies outlined in the National Plan for Foster Children, Young People and their Carers 2004-2006.

Non-statutory kinship care is an increasingly recognised form of care in NSW. While NSW allowances provided to authorised kin carers of children in non-statutory care have been brought into line with those provided to foster carers<sup>9</sup>, the formal recognition of these arrangements has raised significant issues around what kind of monitoring and broader support should be provided to these kin carers and the children in their care. As non-statutory kin care and other types of care arrangements are a national issue, there would appear to be merit in considering whether national standards should be in place for these kinds of care arrangements.

In terms of national standards for the OOHC system, we observe that part of recent improvements we have seen to the NSW system can be attributed to the role of the Children's Guardian in accrediting OOHC service providers. We believe it may be worthwhile considering whether accreditation of OOHC service providers should be part of the service system within each State and Territory.

In our OOHC submission, we have made a number of specific observations about the adequacy of current arrangements for children in OOHC in NSW. Many of these observations have relevance to OOHC generally, regardless of which jurisdiction is providing the care.

We also recently finalised a report into Aboriginal children in foster care. As more than 30% of all children and young people living in OOHC in NSW are Aboriginal, many of the issues and observations regarding Aboriginal children in care also apply to children in care generally. Our key findings are summarised in our Aboriginal communities submission.

You will note that some of the issues on which we comment are:

- leaving care
- critical elements in relation to supporting foster carers
- the challenge in relation to foster carer recruitment
- educational issues pertaining to children in OOHC, such as the need to capture basic data on educational outcomes – this is clearly a national issue
- the need for all children in OOHC to receive comprehensive health and development assessments and appropriate follow up, and
- in relation to Aboriginal children in OOHC, the need for cultural care planning and meaningful adherence to the Aboriginal placement principles.

In relation to decisions around whether children should come into care and, if so, the particular arrangements which should be in place, we believe some discussion around the nature of care proceedings would be useful. It is our view that court processes should, where possible, adopt a non-adversarial approach. In this regard, we note that family group conferencing is being used across New Zealand in connection with care applications and that NSW is in the process of commencing a care circle trial (in the town of Nowra) for care applications involving Aboriginal children.

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<sup>9</sup> ie children in statutory care – whether or not the carers are kin.

## **4. Improving responses to Indigenous children**

We strongly endorse the emphasis in the discussion paper on responding to the needs of Indigenous children. Our detailed Aboriginal communities submission outlines our views on discrete issues which need to be addressed in NSW in relation to:

- Aboriginal children who are already involved in the child protection system, and
- responding to child protection matters in Aboriginal communities more generally.

You will note that we canvass a number of the same issues as those covered in the discussion paper.

## **5. Attracting and retaining the right workforce**

In relation to workforce challenges, we fully support the comments in the discussion paper and in the NSW Government's submission. In our OOHC, Assessment and Aboriginal communities submissions, we raised workforce challenges as a potential barrier to service enhancement. We would note that workforce challenges are particularly acute in relation to remote areas. In this regard, please see pages 9 and 30 to 35 in our Aboriginal communities submission.

The ongoing growth of NGOs in providing OOHC and early intervention and prevention services means that the workforce challenges are likely to increase into the future.

Apart from the issue of recruiting sufficient numbers of qualified staff, the growth in NGO services raises specific challenges to do with coordination, communication and integration between government agencies and the NGO sector.

## **6. Improving child protection systems**

We acknowledge that more consistent legislative frameworks across jurisdictions may only be achievable in the longer term. However, we believe that it would be desirable to explore the possibility of moving towards:

- consistent thresholds for the reporting of child protection matters,
- consistent conditions for determining whether a child is at risk of harm or otherwise in need of support, and
- consistent grounds for care orders (described in NSW in terms of whether a child is in need of care and protection).

Consistent terminology more generally across the child protection field would also be helpful in facilitating effective communication between jurisdictions.

We also support the specific objectives outlined on page 28 of the discussion paper in relation to those issues which should be addressed in the shorter term. In this regard we note that the national reporting and accountability mechanisms suggested are consistent with what we have outlined earlier in this submission. Given the disparate nature and circumstances of local communities, it is our view that it is essential that the data capture of key child welfare

indicators and the accountability and planning mechanisms have application down to the local community level.

We would support measures that promote a solid research base for all child protection work, including not only performance against child welfare indicators, but also analysis of broad trends and underlying causal factors of child abuse and neglect.

Finally, we note the reference in the discussion paper to Commissioners for Children established within various States and Territories who are described as -focus(ing) on the child protection systems within their jurisdiction.ø We believe that this represents an inaccurate picture of the NSW landscape and suggest that this demonstrates that there is a need to ensure that the current role of independent bodies across the various jurisdictions will need to be well understood if they are to play an effective role in supporting the implementation of the national child protection framework.

## **Conclusion**

Thank you again for the opportunity to contribute to this important initiative. Please contact Steve Kinmond on (02) 9286-0989 if you require any further information. There is also more information about the work of my office available on our website: [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au).

Yours sincerely

**Bruce Barbour**  
**NSW Ombudsman**

**Steve Kinmond**  
**Community and Disability**  
**Services Commissioner**  
**(Deputy Ombudsman)**