

SUBMISSION TO THE FAMILIES AND CHILDREN ACTIVITY REVIEW

February 2025

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Acknowledgment

SNAICC shows respect by acknowledging the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities.

SNAICC pays respects to Elders past and present and we acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted.

SNAICC's head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally.

About SNAICC

SNAICC is the national non-government peak body for Aboriginal and Torres Strait Islander children. Our work is concentrated on the fulfilment of the rights of our children, to ensure their safety, development, and well-being. At the heart of SNAICC's work is championing the principles of community control and self-determination as the means for sustained improvements for children and families – whether in child protection and wellbeing or early childhood education and development.

SNAICC has a dynamic membership of Aboriginal and Torres Strait Islander community-based child care agencies, Multi-functional Aboriginal Children's Services, crèches, long day care child care services, pre-schools, early childhood education services, early childhood support organisations, family support services, foster care agencies, family reunification services, family group homes, services for young people at risk, community groups and voluntary associations, government agencies and individual supporters. As the national peak body for Aboriginal and Torres Strait Islander children, SNAICC consults with its member organisations and Aboriginal and Torres Strait Islander leaders to ensure the experiences, needs and aspirations of our leaders, our sector and ultimately, our children and families are the foundation for our submissions and recommendations.

SNAICC's work in the Child and Family Wellbeing sector is critical in transforming Australia's systems to better foster strong, healthy, thriving Aboriginal and Torres Strait Islander children who are connected to family and culture and part of self-determining communities. We also endorse the importance of family, community, culture and country in child and family welfare policy, legislation and practice. Our work comprises policy, advocacy, and sector development. We work with non-Indigenous services alongside Federal, State and Territory Governments to improve how agencies design and deliver supports and services for Aboriginal and Torres Strait Islander children and families.

Introduction

SNAICC welcomes the opportunity to provide a submission to the Department of Social Services' (the Department) review of Children, Youth and Parenting Programs under the Families and Children Activity (FaC Activity Review). **The FaC Activity Review represents a major opportunity to improve outcomes for Aboriginal and Torres Strait Islander children by increasing the proportion of FaC Activity-funded services delivered by Aboriginal and Torres Strait Islander organisations (ACCOs), in line with Priority Reform 2 and Clause 55 of the National Agreement on Closing the Gap¹.**

The Department's current approach to funding child, youth and parenting programs is not working to achieve improved outcomes for Aboriginal and Torres Strait Islander children and their families to meet Closing the Gap Targets 12². The over-representation of Aboriginal and Torres Strait Islander children in out-of-home care has worsened since the baseline year when data collection began³. According to the 2024 Family Matters Report, Aboriginal and Torres Strait Islander children are 5.6 times more likely than non-Indigenous children to be reported to child protection authorities and 7.2 times more likely to have notifications substantiated⁴.

Local and international evidence demonstrates self-determination is the most effective policy setting to reverse these trends and generate sustained improvements in outcomes for First Nations children and families⁵. ACCOs embody self-determination for children and families, because their ways of working involve communities deciding themselves what services they and their children need to thrive. For Aboriginal and Torres Strait Islander children and families, support services delivered by ACCOs are most effective, as these organisations employ more Aboriginal and Torres Strait Islander staff, are accountable to their local communities and deliver culturally safe services that address families' holistic needs⁶. This means ACCOs secure higher levels of engagement from Aboriginal and Torres Strait

¹ Closing the Gap 2020, 'National Agreement on Closing the Gap', p. 10. Retrieved from: <https://www.closingthegap.gov.au/sites/default/files/files/national-agreement-ctg.pdf>.

² Closing the Gap n.d., 'Closing the Gap Targets and Outcomes'. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/targets>.

³ Productivity Commission 2024, 'Closing the Gap Annual Data Compilation Report', p. 29. Retrieved from: <https://www.pc.gov.au/closing-the-gap-data/annual-data-report/closing-the-gap-annual-data-compilation-july2024.pdf>.

⁴ SNAICC 2024, 'Family Matters Report 2024', pg. 10. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/11/241119-Family-Matters-Report-2024.pdf>.

⁵ Cornell and Kalt 2010, 'American Indian Self-Determination: The Political Economy of a Policy that Works', *Harvard Kennedy School Project on Indigenous Governance and Development*, p. 15. Retrieved from: <https://indigenousgov.hks.harvard.edu/publications/american-indian-self-determination-political-economy-successful-policy>.

⁶ Sullivan, P. (2010) The Aboriginal community sector and the effective delivery of services: Acknowledging the role of Indigenous sector organisations. 1-20.

Islander children and families, as opposed to non-Indigenous services, which are less trusted given the ongoing impacts of colonisation, racism and child removal⁷.

SNAICC's objective is to work with the Department, in genuine partnership, to substantially increase the proportion of FaC Activity funding to ACCOs and strengthen the sector to deliver community-led, place-based child and family services that are tailored to community needs. **The current proportion of ACCO service providers of children, youth and parenting programs is far too low** (4%) and in spite of a 20% increase in the number of Aboriginal and Torres Strait Islander children and families accessing these services between 2016 and 2021⁸. The proportion of funding provided to ACCOs should be closely aligned to the higher level of need for family supports experienced by Aboriginal and Torres Strait Islander people, reflected in overrepresentation in child protection systems, where Aboriginal and Torres Strait Islander children make up 43.7% of all children in care.

Current FaC Activity funding allocation to ACCOs must be significantly increased to align with the National Agreement on Closing the Gap (National Agreement). As signatories to the National Agreement, all Australian governments recognise Aboriginal and Torres Strait Islander community controlled is an act of self-determination (Clause 44) self-determination and acknowledge that Aboriginal and Torres Strait Islander community-controlled services are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services (Clause 43). In recognition of this, all governments have committed to implement funding prioritisation policies to actively preference ACCOs in the provision of services to Aboriginal and Torres Strait Islander communities (Clause 55a).

Failure to transition funding to ACCOs will mean Aboriginal and Torres Strait Islander children and families cannot access the services they need. It will also perpetuate ineffective government spending, by continuing to direct funding towards non-Indigenous providers who are far less likely to achieve improvements in outcomes for Aboriginal and Torres Strait Islander children. This is unacceptable when so many valuable and effective programs delivered by ACCOs are underfunded.

⁷ Campbell et al (2016) Contribution of Aboriginal Community-Controlled Health Services to improving Aboriginal health: an evidence review, *Australian Health Review* 42(2) 218-226 <https://doi.org/10.1071/AH16149>

⁸ Department of Social Services 2024, 'Families and Children Activity - Review of Children, Youth and Parenting Programs - Evidence Paper', p. 3. Retrieved from: <https://engage.dss.gov.au/wp-content/uploads/2024/11/families-and-children-activity-review-children-youth-and-parenting-programs-evidence-paper.pdf>.

SNAICC's submission responds directly to the Discussion Paper and details the practical steps the Department can take to strengthen outcomes for Aboriginal and Torres Strait Islander children and families under the banner of the FaC Activity.

Consultation approach

The positions and recommendations outlined in SNAICC's submission are supported by a number of Aboriginal and Torres Strait Islander leaders, ACCOs and non-Indigenous organisations. From December 2024 to January 2025, SNAICC consulted with the SNAICC National Council of ACCO Child and Family sector representatives, the Safe and Supported Aboriginal and Torres Strait Islander Leadership Group, the Aboriginal and Torres Strait Islander caucus of the Early Childhood Care and Development Policy Partnership, First People's Disability Network, Allies for Children Australia and the First Nations NGO Alliance on the submission. The submission received broad support from our stakeholders, including being formally endorsed by the Commissioner for Children and Young People, Western Australia and Office of the Children's Commissioner, Northern Territory.

National Agreement on Closing the Gap

The National Agreement on Closing the Gap is one of the most significant changes in the policy landscape in the last five years. All Australian governments are committed to working with Aboriginal and Torres Strait Islander people, their communities, organisations and businesses to implement the National Agreement at the national, state and territory, and local levels.

The National Agreement sets the key parameters for system reforms impacting Aboriginal and Torres Strait Islander people in Australia. It is grounded in Aboriginal and Torres Strait Islander perspectives on what is essential for improving their lives and includes priority areas to reform how governments work with Aboriginal and Torres Strait Islander people. It also outlines government accountability measures and shared monitoring and implementation arrangements.

The Priority Reforms must inform all government actions including legislation, policy and practice, and are critical to driving change for Aboriginal and Torres Strait Islander communities across Australia.

- 1. Formal Partnerships and Shared Decision-Making:** Aboriginal and Torres Strait Islander people are empowered to share decision-making authority with governments, to accelerate policy and place-based progress on Closing the Gap through formal partnership arrangements.
- 2. Building the Community-Controlled Sector:** There is a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector delivering high quality services to meet the

needs of Aboriginal and Torres Strait Islander people across the country. Clause 55 under the National Agreement commits government parties to implement measures that increase the proportion of services delivered by Aboriginal and Torres Strait Islander organisations, particularly community-controlled organisations.

- 3. Transforming Government Organisations:** Governments, their organisations and their institutions are accountable for Closing the Gap and are culturally safe and responsive to the needs of Aboriginal and Torres Strait Islander people, including through the services they fund.
- 4. Shared Access to Data and Information at a Regional Level:** Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to set and monitor the implementation of efforts to close the gap, their priorities and drive their own development⁹.

The priority reform areas provide the foundational pillars for funding reform and must be collectively implemented in the review and reallocation of funding under the FaC Activity.

Aboriginal Community Controlled Organisations

Aboriginal Community Controlled Organisations (ACCOs) are the preferred provider of services to Aboriginal and Torres Strait Islander children and their families, in accordance with the Priority Reforms agreed by all Commonwealth, State and Territory governments through the National Agreement.¹⁰ These include the commitment of all governments to build the Aboriginal community-controlled sector, acknowledging that Aboriginal community control is an integral part of self-determination, and Aboriginal community-controlled services are better for Aboriginal and Torres Strait Islander people.¹¹

Non-ACCO services regularly identify Aboriginal and Torres Strait Islander families as “hard to reach”. However, it is the services themselves that are presenting barriers to Aboriginal and Torres Strait Islander engagement – often because they are not accessible, culturally safe, appropriate or responsive to the needs of Aboriginal and Torres Strait Islander children and families. **ACCOs offer an alternative, accessible service that delivers better results for families.**

⁹ Closing the Gap n.d., ‘National Agreement on Closing the Gap, Priority Reforms’. Retrieved from: <https://www.closingthegap.gov.au/national-agreement/priority-reforms>.

¹⁰ Ibid.

¹¹ Ibid.

Current FaC funding settings are not effectively supporting ACCOs to deliver FaC children, youth and parenting services. To produce the [Stronger ACCOs, Stronger Families Report](#), SNAICC consulted ACCO child and family services on their strengths, needs, barriers and opportunities for accessing Department funding and delivering the FaC children, youth and parenting programs.¹² The report identified significant systemic barriers faced by ACCOs in accessing Commonwealth funding for child and family services. Barriers included competitive grant processes that advantage larger non-Indigenous organisations, reporting and administrative burdens that are not supported by core functions funding. These barriers resulted in a fundamental misalignment between how services are funded, and the services communities want and need.

Many of these barriers can be overcome by working in accordance with the principles of self-determination and community-led decision making, as committed to under the National Agreement. ACCOs have repeatedly identified that dedicated, sustainable, flexible, and sufficient funding would enable them to build upon the existing strengths of their sector by increasing the number of ACCOs and delivering services to more Aboriginal and Torres Strait Islander children and families. This in turn would provide more appropriate support for those families, allowing children to remain safely at home and supporting them to thrive.

This submission sets out a proposed approach that will grow the proportion of ACCO service providers of FaC Activity-funded programs in a way that strengthens the sector and therefore will ensure sustained improvements in outcomes for Aboriginal and Torres Strait Islander children and families. Overarching recommendations and detailed responses to the Discussion Paper are outlined below.

¹² SNAICC 2022, 'Stronger ACCOs Stronger Families'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2023/05/SNAICC-Stronger-ACCOs-Stronger-Families-report-2022.pdf>.

Recommendations

SNAICC provides the following recommendations. Through the FaC Activity Review, the Department should:

Transition a proportion of existing FaC funding to ACCOs and improve the delivery of FaC funding

1. Commit to transition a proportion of existing funding for FaC Activity children, youth and parenting programs to the ACCO sector in 2026, in partnership with Aboriginal and Torres Strait Islander peak bodies and communities. This transition should deliver a target proportion of funding to ACCOs which is aligned to needs of Aboriginal and Torres Strait Islander children and families (30-40% of funding).¹³ To do this, the Department should:
 - a) Publicly commit to transitioning this funding to the ACCO sector by mid-2025, specifying annual transition milestones to provide the sector with a clear direction and allow for successful transition planning to meet the target or quarantined funding amounts.
 - b) Partner with relevant Aboriginal and Torres Strait Islander and non-Indigenous peak bodies in 2025 to support implementation of the funding transition by mid-2026.
 - c) Partner with SNAICC and jurisdictional Peaks in 2025 to support ACCOs to put forward strong proposals to deliver the child and family services their communities need when current FaC Activity contracts come to an end in mid-2026.
2. To support the achievement of recommendation 1, identify a proportion of funding within existing FaC program streams to be reallocated to a new funding stream for Aboriginal and Torres Strait Islander community-led child and family services that are locally designed and managed by ACCOs. The Department should notify existing providers as early as possible of the intention to reduce funding in existing streams to allow for effective transition planning.
3. Partner with Peaks in 2025 to engage ACCOs that are already delivering child and family services or may aspire to do so, whether funded through the FaC activity or another state, territory or Commonwealth program, to confirm their interest and readiness for service expansion and longer-term service funding, and undertake planning to commence delivery.

¹³ Recognising the FaC activity is targeting the needs of children experiencing vulnerability, the Stronger ACCOs, Stronger Families report recommends funding targets of approximately 30-40%, noting that Aboriginal and Torres Strait Islander children make up 43.7% of all children in out-of-home care, providing a proxy indicator of the level of need for preventative supports. Higher targets of 90-100% are recommended for targeted programs for Aboriginal and Torres Strait Islander children and families and in discreet communities.

4. Provide seed funding to ACCOs identified at recommendation 3 for the community-led design, development and strengthening of child and family service programs that can be funded ongoing under the FaC Activity from mid-2026. Ideally, seed funding would be provided early to ensure readiness for delivery in mid-2026, however could also be provided as part of an establishment phase for new providers when funding is transitioned in mid-2026.¹⁴
5. Commission a partnership framework for knowledge sharing by the end of 2025, to support large-scale non-Indigenous organisations to transition funding and service responsibility to ACCOs. This framework can build on existing resources SNAICC and Life Without Barriers have produced to support the transition of OOHHC services from non-Indigenous organisations to ACCOs, as well as the Evidence Guidance Framework being commissioned by the Early Childhood Care and Development Policy Partnership.
6. Provide longer-term core operational funding to ACCOs delivering child and family services from 2026 onwards to ensure adequate core capacity for developing and expanding service delivery. This funding must be separate to programmatic funding, be at least five years in duration, and indexed to match rising service demand and inflation.
7. Extend the term of FaC Activity grants to at least five years in duration to provide stability for services and families. This extension should only be applied after funding has been transferred to ACCOs in line with recommendation 1.
8. Partner with SNAICC, ACCOs and Aboriginal and Torres Strait Islander researchers and research organisations to develop a culturally responsive measurement framework for ACCOs delivering FaC Activity services. This framework would be an alternative to current reporting requirements through the Department's Data Exchange. This measurement tool should be developed and rolled out alongside new FaC Activity contracts in mid-2026.

Enact broader reforms to child and family services funding to provide the sector with clarity and improve outcomes for Aboriginal and Torres Strait Islander children

9. Identify resourcing requirements and appropriate funding to support the effective implementation of the National Child and Family Investment Strategy within set implementation planning timeframes for the Strategy once agreed.

¹⁴ Note: A level of seed funding for child and family service development and transition activities is or will be provided to ACCOs under existing DSS funding streams, including the National Child and Family Investment Strategy Innovation Fund and the Improving Multi-Disciplinary Responses program. There is an opportunity to consider potential ongoing funding for ACCOs developing services under these programs through the FaC Activity.

10. Implement Aboriginal and Torres Strait Islander organisation first procurement policies in partnership with Commonwealth Government central agencies, including the Grants Connected Policy.
11. Implement Aboriginal and Torres Strait Islander community-led commissioning as a permanent feature of Commonwealth child and family services funding, in line with recommendation 2 from the Productivity Commission Closing the Gap Review and commitments under Action 2 of the Safe and Supported Aboriginal and Torres Strait Islander First Action Plan 2023-2026.
12. Implement recommendation 14 of the Independent Review into the National Disability Insurance Scheme and invest in Aboriginal and Torres Strait Islander community-led commissioning of disability support services in partnership with SNAICC and First Peoples Disability Network.
13. Identify existing contracts whereby ACCOs receive funding through sub-contracting arrangements with a non-Indigenous organisation and support a transition process to provide the relevant funding directly to the ACCO under a separate contract where this is preferred by the ACCO.
14. Implement an expanded Evidence Based Program Requirement for the Communities for Children Facilitating Partners program that recognises the value of Aboriginal and Torres Strait Islander evidence, knowledge and experience in supporting children and families.

Response to Discussion Paper questions

Question 8: What changes (if any) should be made to FaC children, youth and parenting programs to strengthen outcomes for First Nations children?

ACCOs are the optimal providers of services to Aboriginal and Torres Strait Islander children and their families, however, they represent only 4% of delivery organisations¹⁵. This is far too low, given that Aboriginal and Torres Strait Islander people are accessing children, youth and parenting programs at a much higher rate than non-Indigenous people. SNAICC recommends the Department prioritise the following changes in response to the FaC Activity review.

ACCO child and family services funding prioritisation policies

The Department should quarantine a proportion of existing child and family service funding for delivery through ACCOs that is equivalent to the needs of Aboriginal and Torres Strait Islander children and families, including establishing funding targets for child and family services programs (Recommendation 1). This policy should be informed by percentage allocations that were developed in Stage 1 of the Stronger ACCOs, Stronger Families Project to align funding allocations to Aboriginal and Torres Strait Islander family need, population and geographies¹⁶:

Program demographics	Recommended % of funding quarantined for ACCOs
A program is targeted for Aboriginal and Torres Strait Islander children and families (through either target population or service areas with predominantly Aboriginal and Torres Strait Islander populations)	90 - 100% of the amount of funding that is proportionate to Aboriginal and Torres Strait Islander service users and populations in the relevant programs in local and jurisdictional contexts will be available only to ACCOs
A program is targeted for vulnerable children and families, a proportion of funding based on Aboriginal and Torres Strait Islander child and family need in local and jurisdictional contexts (using representation in out-of-home care as a proxy indicator) of child and family need	30 - 40% of funding will be available only to ACCOs

¹⁵ Department of Social Services 2024, 'Families and Children Activity - Review of Children, Youth and Parenting Programs - Evidence Paper', p. 22. Retrieved from: <https://engage.dss.gov.au/wp-content/uploads/2024/11/families-and-children-activity-review-children-youth-and-parenting-programs-evidence-paper.pdf>.

¹⁶ SNAICC – National Voice for Our Children 2021, Stronger ACCOs, Stronger Families Report, pg. 42. Retrieved from: 230502_8_Stronger-ACCOs-Stronger-Families-Report.pdf

A program is targeted for the general population of children and families	at least 10% of a suitable proportion of funding will be available only to ACCOs, acknowledging the need for higher focus on engaging Aboriginal and Torres Strait Islander families through universal provision to address inequities and achieve Targets under the National Agreement.
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There are strong precedents in states and territories for progressing funding targets to increase the proportion of services delivered by Aboriginal and Torres Strait Islander organisations. This has resulted in growing the capabilities of ACCOs across the country to deliver prevention and early intervention focused supports to children and families. Many of these ACCOs would be well-positioned to deliver Commonwealth-funded child and family programs but have not had the opportunity to access funding due to decades of funding roll-over to existing non-Indigenous providers. Examples of these successful and growing ACCO family service programs funded by states and territories are outlined below.

- The NSW government has had a long-standing target to achieve 30% of Targeted Earlier Intervention (TEI) funding delivery by ACCOs and is currently undertaking a recommissioning process to support achievement of the target¹⁷;
- In 2020/21 the South Australian government pursued and met a target for 30% of intensive family support services to be delivered by ACCOs¹⁸;
- The Queensland Government created a targeted Aboriginal and Torres Strait Islander Family Wellbeing Service program open only to ACCOs, that since 2016 has successfully launched 34 new ACCO family services, which has significantly built ACCO family support capacity¹⁹. Data shows strong year-on-year increases in family engagement as these services have been developed, with 52% of families having all or the majority of their needs met by Family Wellbeing Services²⁰. Of these children and families, 88% who had a case closed had no further child protection investigations as of June 30 2024²¹.

¹⁷ New South Wales Department of Communities and Justice 2024, 'TEI Recommissioning 2025'. Retrieved from: <https://dcj.nsw.gov.au/service-providers/deliver-services-to-children-and-families/targeted-earlier-intervention-program/tei-recommissioning-2025.html>.

¹⁸ SNAICC 2024, 'Reviewing Implementation of the Aboriginal and Torres Strait Islander Child Placement Principle: South Australia 2021'. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/04/ATSICPP-Implementation-Review-SA-2021.pdf>.

¹⁹ Queensland Family and Child Commission 2024, 'Growing up in Queensland: A story of child and family wellbeing', p. 236. Retrieved from: https://www.qfcc.qld.gov.au/sites/default/files/2024-02/9022_QFCC_Growing%20Up%20in%20Queensland.WCAG%20reading%20order_01%20COMPRESSED.pdf.

²⁰ Department of Child Safety, Seniors and Disability Services 2024, 'Family Wellbeing Service (FWS)'. Retrieved from: <https://performance.dcssds.qld.gov.au/supporting-queensland-families/what-family-support-services-achieve/family-wellbeing-service-fws>.

²¹ Ibid.

There are significant opportunities for the Commonwealth Government to amplify service effectiveness through joint investment in ACCO child and family service providers that have been developed and grown through state and territory programs and ACCO funding targets. Investment in these services will support outcomes for Aboriginal and Torres Strait Islander children and young people and progress towards Closing the Gap targets.

Aboriginal and Torres Strait Islander led decision-making in funding development and allocation

Funding will reach communities faster and with greater precision if Aboriginal and Torres Strait Islander-led decision-making takes place in the early stage of funding development and allocation for programs that disproportionately impact Aboriginal and Torres Strait Islander children and families. This approach is crucial because government-funded programs often do not meet Aboriginal and Torres Strait Islander community needs or support holistic care models. Aboriginal and Torres Strait Islander-led decision making enables the commitment to support self-determination through shared decision-making (National Agreement clause 32(c)(v.)), which necessitates that governments recognise, respect and support the cultural authority and leadership of Aboriginal and Torres Strait Islander communities to determine what resources are needed and how they are best allocated to support their children and families. The Department should identify and reform any current processes for consulting with Aboriginal and Torres Strait Islander communities that do not meet the standard of the Strong Partnership Elements under Priority Reform 1.

The Department should partner with SNAICC and jurisdictional peak organisations to support ACCOs to put forward strong proposals to deliver the children and family services their communities need when current FaC Activity contracts come to an end in mid-2026.

Direct investment in ACCOs to adequately resource core functions, infrastructure and service delivery

In line with Clause 45a of the National Agreement, strong sectors require sustained capacity building and investment in ACCOs. Clause 45d requires that ACCOs who deliver common services have a dedicated, reliable and consistent funding model designed to suit the types of services required by communities.

Sustainable investment in ACCOs is dependent on the provision of core funding to meet the cost of operating services. Core funding is required to address the historical and systemic resourcing disadvantages ACCOs have faced, and their small scale of operations compared to many non-Indigenous providers. Historically, Aboriginal and Torres Strait Islander people have been excluded

from property ownership and other forms of wealth building, creating ongoing imbalances in resources between ACCOs and other providers²². Current funding approaches prioritise larger organisations that can draw core resourcing from their economies of scale and diversity of service provision, but ACCOs are strengthened because of their local community connections and knowledge, which require smaller-scale and tailored operations²³. Funding core operations for ACCOs is a necessity for addressing entrenched disadvantage and recognising the unique strengths of ACCOs as service providers for Aboriginal and Torres Strait Islander people and communities.

Direct investment in ACCOs is required to adequately resource core functions, infrastructure and service delivery. Recommended Action 3 of the Stronger ACCOs, Stronger Families Report states the Department should provide core operational funding to ACCOs delivering children and families services. The Department can draw on examples of promising practice being undertaken by other Commonwealth agencies, such as:

- Commonwealth Department of Education commissioning and implementation of [the Funding Model Options for ACCO Integrated Early Years Services Report recommendations](#).
- [Commonwealth Department of Health and Aged Care formal funding agreement with the National Aboriginal Community-Controlled Health Organisation to deliver the Sector Support Network](#). The Network aims to align Commonwealth health expenditure for Aboriginal and Torres Strait Islander communities with investment in the ACCHO sector.

The Department should scope the provision of direct and adequate funding to ACCOs providing child and family services to meet their core service, delivery and organisational development needs. Core funding should be at least five years in duration and be indexed to reflect inflation and rising service demand from Aboriginal and Torres Strait Islander children and families.

Any permanent funding model/s need to be researched and negotiated in genuine partnership and shared decision-making with Aboriginal and Torres Strait Islander communities. The Early Childhood Care and Development Policy Partnership has a related priority that the Department can leverage to complete this scoping exercise.

Priority 1B: Develop models for adequate and coordinated funding of ACCOs that deliver child and family services, in consideration of the real cost of service delivery, including core functions, capital infrastructure, wage parity and other workforce costs.

²² SNAICC 2023, 'Stronger ACCOs, Stronger Families: Final Report', p. 23. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2023/05/SNAICC-Stronger-ACCOs-Stronger-Families-report-2022.pdf>.

²³ Ibid., p. 36.

The ECCDPP and Safe and Supported Governance are mechanisms for the Department to negotiate a new funding model through shared decision-making with Aboriginal and Torres Strait Islander leaders.

Resourcing and empowering ACCOs to partner with non-Indigenous organisations to fill service gaps in their communities

The high demand from Aboriginal and Torres Strait Islander children and families combined with the current FaC Activity funding approach has catalysed unequal sub-contracting arrangements between ACCOs and non-Indigenous service providers of children, youth and parenting programs that typically limit the scope for Aboriginal and Torres Strait Islander led service design and leadership. Sub-contracting arrangements between ACCOs and non-Indigenous organisations are most common in the HIPPY and Communities for Children Facilitating Partner (CfC FP) program streams, according to The Stronger ACCOs, Stronger Families Report²⁴. The power imbalance between the ACCO and non-Indigenous child and family services sector is a result of governments neglecting vital sector strengthening reforms.

The Department should identify existing contracts whereby ACCOs receive funding through sub-contracting arrangements with a non-Indigenous organisation and identify opportunities and transition supports to provide the relevant funding directly to the ACCO under a separate contract wherever ACCOs are interested to operate their own independent services (recommendation 12). Where partnership arrangements between ACCOs and non-Indigenous organisations are required to ensure continuity of care, the Department should provide funding to the ACCO as the lead grant recipient to counter power imbalances and enable Aboriginal and Torres Strait Islander service leadership.

Question 9: How could the number of ACCOs delivering FaC children, youth and parenting programs be increased within existing funding, especially in First Nations focused communities?

The number of ACCOs delivering FaC children, youth and parenting programs can be increased within existing funding by recommissioning and transitioning funding for a proportion of service delivery towards the ACCO sector, aligned to the need of Aboriginal and Torres Strait Islander children and families (recommendations 1 and 2).

The transition of FaC funding is complicated by the narrowly defined and rigid program streams that currently operate within the FaC Activity. For example, the CfC program provides over \$70 million in

²⁴ SNAICC – National Voice for Our Children 2021, Stronger ACCOs Stronger Families Report, pg. 52. Retrieved via [230502_8_Stronger-ACCOs-Stronger-Families-Report.pdf](#)

funding exclusively to non-Indigenous providers, with ACCOs only able to access program funding by sub-contracting with a non-Indigenous provider. Similarly, the \$32 million HIPPY program is only accessible to ACCOs through sub-contracts with the lead provider and licence holder for the program and does not allow for community-led and designed models to support parents and children.

Addressing this rigidity that excludes ACCOs from direct funding and leadership in service design and delivery is critical to the reform of the FaC Activity in alignment with the National Agreement on Closing the Gap. While service continuity in communities is important, service continuity is not of itself an evidence-based justification for neglecting to redesign and recommission services to increase their effectiveness for children and families. A level of discontinuity will be an inevitable result of effective system reform but can be minimised through effective transition supports and processes. The impact of this discontinuity will be offset by a system that delivers more effective programs for First Nations children and families.

A potential way to progress and achieve the transition would be to allocate a proportion of funding from existing streams to a new targeted funding stream for Aboriginal and Torres Strait Islander community-led child and family service programs, delivered through ACCOs. Existing providers could be notified by mid-2025 of planned program funding reductions. This would allow time for service planning and partnership work with local ACCOs to support their aspirations for expanding service delivery, including through funding, resource, and workforce transition processes.

An alternative to this approach that would allow for greater service continuity and an increased response to the high level of unmet family needs, would be for the Australian Government to significantly increase overall expenditure for the FaC activity allowing for a targeted stream of support for Aboriginal and Torres Strait Islander families to be developed without interrupting existing mainstream service provision.

Non-Indigenous organisations that are funded to deliver services to Aboriginal and Torres Strait Islander children and families must work with local ACCOs to take tangible steps towards commencing and completing transition processes. This includes upholding the importance of ACCOs leading transfer or transition processes from non-Indigenous organisations, to ensure a genuine and meaningful process and avoid tokenistic practices. Major providers of child and family services are transitioning services and resources delivered to Aboriginal and Torres Strait Islander children and families to the ACCO sector. Life Without Barriers (LWB) and SNAICC have entered a collaborative transition partnership to shift responsibility for delivering out-of-home care services to Aboriginal and Torres Strait Islander children to ACCOs, and to promote culturally responsive practice in the non-

Indigenous sector²⁵. As a founding member of Allies for Children Australia, LWB has committed to transition Aboriginal and Torres Strait Islander children in their care to ACCOs in recognition that ACCO-delivered services produce better outcomes for Aboriginal and Torres Strait Islander children and their families²⁶. The SNAICC & LWB partnership aims to develop frameworks for effective service transition that are initiated in response to community-led decision-making and free, prior and informed consent by both organisations. The components of the transition framework include shared governance models, knowledge and skills transfer between staff, and participatory engagement with community leaders, Elders, and stakeholders. The knowledge framework provides a vehicle to resolve challenges such as resource allocation, foster carer reluctance, and navigating legislative barriers through adaptive strategies and continuous engagement. There is a concrete link between service transition and higher levels of Aboriginal and Torres Strait Islander children living safely with their family, which drives towards Closing the Gap targets 4 and 12. The Family Matters Report 2024 carries the story of Leo*, a Gunggari child, who transitioned from an LWB-support foster carer placement back to his family²⁷. Leo's safe reunification with his sister Elizabeth* occurred as a direct result of a partnership between LWB and Kurbingui Youth & Family Development (QLD) to transition service delivery for Aboriginal and Torres Strait Islander children.

These examples demonstrate the commitment to partnerships, community-led processes, place-based approaches and local decision making that is based off community responses, needs and solutions. Additional transition case studies are at **Appendix A**.

As the funding body, the Department must signal to the non-Indigenous child and family services sector that transition of funding to the ACCO sector is a priority and necessary for improving outcomes for Aboriginal and Torres Strait Islander children (recommendations 1 and 2). To plan the transition, the Department should establish relationships with Aboriginal and Torres Strait Islander national and jurisdictional peak bodies in recognition of the backbone support they give to the sector. Local conversations between non-Indigenous organisations and ACCOs relating to the transfer of funding and responsibilities can also support the Department in implementing the transition

²⁵ SNAICC – National Voice for Our Children 2024, Family Matters Report, pg. 111.

²⁶ SNAICC – National Voice for Our Children 2024, Family Matters Report, pg. 111.

* Leo is a pseudonym.

²⁷ SNAICC 2024, 'Family Matters Report 2024', p. 104. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/11/241119-Family-Matters-Report-2024.pdf>.

*Elizabeth is a pseudonym

Transition planning for the transfer of resources and responsibilities from the non-Indigenous child and family service sector must commence now, for new providers and activities to take effect when current contracts cease in mid-2026.

There is a range of practical guidance on the strategic and operational aspects of shifting funding and functions to ACCOs the Department can use to support the transition. These resources are summarised below and outlined in detail at **Appendix B**:

- SNAICC's Genuine Partnerships resources, audit tool, training program and guidance materials that support genuine partnership of non-Indigenous providers and government agencies with ACCOs to facilitate increased service delivery roles and funding transfer to ACCOs.
- SNAICC's ACCO Leadership Transition Framework, which was developed to inform and guide the transition of the Connected Beginnings backbone role from non-Indigenous organisations to ACCOs where there is agreement and support from the community.
- The Stronger ACCOs Stronger Families Report, that draws on research and consultation with the ACCO sector on the barriers to ACCOs accessing government funding for child and family services and what is required to overcome them.

Question 2: What (if any) change should be made to FaC children, youth and parenting programs to account for the different service needs and preferences of families?

A high proportion of FaC children, youth and parenting programs should be delivered by ACCOs to meet the service needs and preferences of First Nations families. FaC programs are targeted to children and families experiencing vulnerability. However, they are currently not sufficiently targeted to respond to the needs of Aboriginal and Torres Strait Islander children and their families, who are estimated to make up approximately 40% of the population of children experiencing higher levels of vulnerability as reflected in child protection systems interventions. Significant redesign of the existing suite of mainstream FaC children, youth and parenting programs is required to ensure programs and services are tailored for and designed and delivered by Aboriginal and Torres Strait Islander communities and their organisations. FaC programs delivered by non-Indigenous service providers are much less likely to account for the different service needs and preferences of Aboriginal and Torres Strait Islander communities.

Research commissioned by the Department and additional work conducted by SNAICC indicates why these services provide better results for families. In 2020, the Department commissioned Social Compass to conduct independent evaluation of Commonwealth-funded intensive family support services (IFSS). Social Compass engaged with ACCO providers of IFSS to develop a criteria to assess

the appropriateness, efficiency and effectiveness of IFSS service delivery in Aboriginal and Torres Strait Islander communities²⁸. This criteria includes:

- Strong cultural governance of services
- Flexibility to adapt service models to reflect local cultural frameworks and local experiences of trauma
- Program tools and resources are locally designed and delivered in language
- Programs are delivered by bi-cultural teams of Aboriginal and Torres Strait Islander and non-Indigenous staff
- Strong focus on broader community engagement, rather than focusing solely on individual families.

The findings of the evaluation, aligned to these criteria demonstrate how ACCOs are better able to tailor their services to meet the needs of families. Key findings included that:

- Cultural governance of Elders supported the adaption of IFSS programs to be culturally appropriate, trauma-informed and therefore, beneficial for Aboriginal and Torres Strait Islander children and families in the community.
- Community-led design of program tools and resources have increased cultural appropriateness of service delivery and enhanced family engagement
- There are strong community perceptions that the programs are achieving positive incremental outcomes for children, parents, carers and families.

SNAICC has profiled ACCOs delivering Commonwealth-funded IFSS programs that have achieved better outcomes for Aboriginal and Torres Strait Islander children and families as a result of Aboriginal and Torres Strait Islander community-led adaptation and application of service models. SNAICC refers the Department to these case studies:

²⁸ Social Compass 2020, 'Evaluation of the Intensive Family Support Service'. Retrieved from: <https://www.dss.gov.au/system/files/resources/attachment-c-ifss-final-evaluation-report.pdf>.

- Delivery of Intensive Family Support programs by the Central Australian Aboriginal Congress (NT)²⁹: this program was consistently evaluated from 2009 to 2020, and a common finding is the transformative practice of Congress' bi-cultural team is driving very high rates of service engagement by Aboriginal and Torres Strait Islander children and families (80%).³⁰
- Delivery of Early Years Program by Maari Ma Health Aboriginal Corporation (NSW). The HIPPY and Intensive Supported Playgroups are delivered under the Early Years Program³¹. Evaluated in 2019, the Early Years Program is supporting Aboriginal children and families to thrive across a range of early developmental wellbeing and family safety domains³².

Despite these models being more tailored to the needs of families, current FaC Activity program data shows the majority of Aboriginal and Torres Strait Islander children and families accessing services are likely to miss out on the benefits of an ACCO community-led model. A key change required is shifting a greater proportion of FaC Activity funding to ACCOs. There are several key resources that provide a strong guiding framework for operationalising the required changes to the FaC Activity, including:

- The National Agreement on Closing the Gap
- The Stronger ACCO's Stronger Families Report
- The draft National Child and Family Investment Strategy³³
- The Connected Beginnings ACCO Leadership Transition Framework

²⁹ SNAICC 2023, 'Central Australian Aboriginal Congress: Family Support Service'. Retrieved from: https://www.snaicc.org.au/wp-content/uploads/2023/09/220201_7_Early-Intervention-Profile-CAAC-FSS-1.pdf.

³⁰ Relevant evaluations: Guenther, Arnott, & Williams 2009, 'Evaluation of the Northern Territory Differential Response Pilot Project – draft final report', *Charles Darwin University*; Darwin; Guenther, Arnott and Williams 2012, 'Final Evaluation Report: Evaluation of the Northern Territory Targeted Family Support Service', *Charles Darwin University*; Darwin; Social Compass March 2020, 'Evaluation of the Intensive Family Support Service'. Retrieved from: <https://www.dss.gov.au/system/files/resources/attachment-c-ifss-final-evaluation-report.pdf>; University of South Australia, 'Evaluation of an Intensive Support Service for Indigenous families in Central Australia'. Unpublished.

³¹ SNAICC 2023, 'Maari Ma Health Aboriginal Corporation: Intensive Supported Playgroups'. Retrieved from: https://www.snaicc.org.au/wp-content/uploads/2023/09/220201_7_Early-Intervention-Profile-Maari-Ma-1.pdf.

³² Tilton and Devitt 2019, 'A descriptive evaluation of the Early Years Program at Maari Ma Health Aboriginal Corporation: Final Report', *Edward Tilton Consulting*. Sandgate, QLD.

³³ The National Child and Family Investment Strategy (the Strategy) has been developed to deliver on the commitments outlined in Action 2 of the Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan. The Strategy will work in collaboration with Safe and Supported to shift towards adequate and coordinated funding of early, targeted, healing-informed culturally safe support services that are effective in supporting children and families, and are delivered by ACCOs. The Strategy presents an opportunity to re-shape the child and family service system and how activities are delivered for all children across Australia. It acknowledges that it is in the best interests of all children to be safely cared for in their own families, with appropriate supports in place to ensure all families can provide safe and nurturing care for children. The Strategy also recognises that ACCOs are best placed to provide holistic, wrap around supports to Aboriginal and Torres Strait Islander children, families and their communities. The Strategy is in late stage draft after extensive consultation and development with community, sector and government stakeholders and is available to DSS to inform program redesign.

- Closing the Gap Grants Connected policy (recommendation 9).

Tangible changes the Department can make to improve programs for Aboriginal and Torres Strait Islander children and families under the FaC Activity are listed above in response to Question 8.

Question 3: What changes (if any) could be made to increase awareness and improve navigation of available supports for families?

Increasing the proportion of ACCOs delivering FaC Activity programs will substantially improve awareness and navigation of available supports for Aboriginal and Torres Strait Islander children and families. The fear of experiencing discrimination, racism and attracting the attention of statutory child protection agencies are deterrents for Aboriginal and Torres Strait Islander families to engage with non-Indigenous service providers³⁴. The Family Matters Report identifies conscious and unconscious bias towards Aboriginal and Torres Strait Islander families and ways of child-rearing are a driver of child protection reporting³⁵.

Aboriginal and Torres Strait Islander families prefer to seek supports delivered in a community-controlled setting, and these supports are most likely to respond effectively to the needs of Aboriginal and Torres Strait Islander children and families³⁶. By their design as community-led organisations, ACCOs are best placed to reach Aboriginal and Torres Strait Islander families. Existing trust and relationships make it much easier to identify the strengths of the families and the goals they want to reach. Increasing the proportion of ACCOs delivering child and family services will flow on to improve awareness and improve navigation of services by Aboriginal and Torres Strait Islander children and families.

Question 5: Apart from the issues outlined above, are there any other changes to FaC children, youth and parenting programs that should be considered to strengthen the community sector? (If yes, please specify)

The Department should implement policy and procedural reforms to increase the duration of FaC Activity funding contracts in parallel with the transfer of funding to the ACCO sector. As explored in The Stronger ACCOs, Stronger Families Report, short-term funding does not support community-led

³⁴ SNAICC 2010; Gilroy et al. 2016; Nolan-Isles et al. 2021

³⁵ SNAICC 2024, 'Family Matters Report 2024', p. 21. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/11/241119-Family-Matters-Report-2024.pdf>.

³⁶ Ibid, pg. 45.

design of child and family services and exacerbates existing pressures on ACCOs³⁷. SNAICC recommends 5-7 years as a preferred timeframe for FaC Activity funding (Recommendation 6).

The Department should take a bespoke approach to strengthening the ACCO sector, in recognition of historic and ongoing underfunding of this sector by governments. This legacy is compounded by a complex regulatory environment for ACCOs and intense competition with mainstream organisations to attract and retain local Aboriginal and Torres Strait Islander staff. As a result, ACCOs experience disproportionately greater administrative burden, compared to non-Indigenous organisations. In addition to historic underfunding, the cultural model of care provided by ACCOs has associated costs that are not program-specific but are critical to achieving strengthened outcomes for Aboriginal and Torres Strait Islander children and families.

SNAICC's recommended approach to investing in the ACCO child and family services sector is outlined above in response to questions 8 and 9.

Question 6: What changes (if any) should be made to FaC children, youth and parenting programs to improve the access and inclusion of parents/children with developmental concern or disability?

The FaC Activity Review has found that families and/or children with developmental concern or disability are accessing child and family services at an increasing rate³⁸. The Department has not presented client demographic data for Aboriginal and Torres Strait Islander children and/or families with disability, however, at least one in five Aboriginal and Torres Strait Islander children who are less than eighteen years old have a disability, compared to one in twelve children among the general population.³⁹ The actual rate is likely to be higher, due to the many barriers to diagnosis, identification and reporting of disability.

The increase in the number of Aboriginal and Torres Strait Islander children and families with disability accessing children, youth and parenting programs is symptomatic of communities feeling unsafe and overlooked by the National Disability Insurance Scheme (NDIS). It is critical to note that FaC children, youth and parenting programs have been developed and implemented without Aboriginal and Torres

³⁷ SNAICC 2023, 'Stronger ACCOs, Stronger Families: Final Report', p. 35. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2023/05/SNAICC-Stronger-ACCOs-Stronger-Families-report-2022.pdf>.

³⁸ Department of Social Services 2024, 'Families and Children Activity - Review of Children, Youth and Parenting Programs - Evidence Paper', p. 3. Retrieved from: <https://engage.dss.gov.au/wp-content/uploads/2024/11/families-and-children-activity-review-children-youth-and-parenting-programs-evidence-paper.pdf>.

³⁹ Ibid.

Strait Islander communities and peak bodies at the table. Therefore, these programs are not informed by a strong understanding of the intersection of Aboriginality and disability.

The Independent Review into the NDIS found that improving access to supports for Aboriginal and Torres Strait Islander children and parents with disability requires alternative commissioning approaches that empower ACCOs to design and deliver culturally responsive disability support services to their communities. To address this barrier, the review recommended governments partner with Aboriginal and Torres Strait Islander peak bodies, ACCOs and communities to roll-out alternative commissioning arrangements for Aboriginal and Torres Strait Islander communities, starting as soon as possible (action 14.1)⁴⁰.

The Department should implement action 14.1 as soon as possible. Community-led commissioning empowers ACCOs to design and deliver tailored support services to children and families with disability. ACCOs can choose to forge partnerships with therapists, allied health practitioners and disability advocates and services to expand the range of supports available to children and families. This model will meet the needs of Aboriginal and Torres Strait Islander families in regional, remote and very remote communities.

Question 7: What type of services are preferred by parents or carers with disability or by children with developmental concern or disability?

To understand the type of services that are preferred by Aboriginal and Torres Strait Islander children and families with disability, the Department should utilise the 'Culture is Inclusion' model⁴¹. This model was developed by the First Peoples Disability Network Australia (FPDN) to distil how Aboriginal and Torres Strait Islander people with disability view themselves: first and foremost, they see themselves as a cultural person with strong, thriving connections within their own communities. Aboriginal and Torres Strait Islander communities have always embraced diversity and inclusion, and these principles are embedded into the ACCO service delivery model⁴².

⁴⁰ Bonyhady and Paul 2023, 'Working together to deliver the NDIS – Independent Review into the National Disability Scheme: Final Report', pg. 46. Retrieved from: <https://apo.org.au/node/325219>.

⁴¹ Avery 2018, 'Culture is Inclusion,' *FPDN*. Available at: <https://fpdn.org.au/product/cultureisinclusion/#:~:text=Author%3A%20Scott%20Avery,the%20concept%20of%20'yarning'>.

⁴² FPDN 2023, 'Submission 95: Review of the National Agreement on Closing the Gap'. Retrieved from: https://www.pc.gov.au/data/assets/pdf_file/0004/368797/sub095-closing-the-gap-review.pdf.

In partnership with a consortium of researchers, SNAICC supported a review of good practice in early childhood developmental support for Aboriginal and Torres Strait Islander families and children⁴³. This Review was commissioned by the Department of Social Services in alignment with Action 2.4 of the Early Childhood Targeted Action Plan under Australia's Disability Strategy 2021-2023. SNAICC invited Aboriginal and Torres Strait Islander sector peaks and community-controlled child and family services to yarn about their experiences of providing early childhood developmental support.

The overarching finding from the consultation is the type of services preferred by parents, carers and children with developmental concern or disability are community-designed and community-led, with culture at the centre. What works best for children and parents living with disability and/or developmental concern are place-based services that recognise and reflect the diversity of Aboriginal and Torres Strait Islander cultures and histories and connect local services together to the needs and aspirations of children and families⁴⁴. Early years services provide a cultural model of disability inclusion, which delivers both disability responsiveness and appreciation. They also provide an important role referring children and families to other trusted services, such as disability support and advocacy and allied health services, because of the relationship between children and their educators, and the co-location of services on-site.

In contrast to this, Aboriginal and Torres Strait Islander parents and carers with disability are often reluctant to engage with mainstream services, including health, education and childcare services, because of the risk of child protection agencies being notified, sometimes for no other reason than a parent having a disability. The Royal Commission into the Neglect and Exploitation of People with Disability highlighted child protection intervention as a severe and punitive response to disabilities among Aboriginal and Torres Strait Islander families and reflected systemic failures of government to tailor support programs to these families⁴⁵.

Question 10: Considering the key elements for successful transition listed above, are there any other elements that would be important? (If yes, please specify)

The role of the non-Indigenous child and family service sector in a successful transition

⁴³ SNAICC and University of Melbourne 2024, 'Review of Best Practice in Early Childhood Intervention: Findings from the SNAICC Engagements'. Retrieved from: https://healthy-trajectories.com.au/wp-content/uploads/2024/11/Review-of-Best-Practice-in-ECI_-Findings-from-SNAICC-Engagements_v1.0_November-2024.pdf.

⁴⁴ Ibid.

⁴⁵ SNAICC 2024, 'Family Matters Report 2024', p. 59. Retrieved from: <https://www.snaicc.org.au/wp-content/uploads/2024/11/241119-Family-Matters-Report-2024.pdf>.

Families Australia's research report *Changing the Balance* examined the impact of the proportionate transition of funding from non-Indigenous NGOs to ACCOs. A key finding of this report is that non-Indigenous child and family service providers largely understand the 'why' of the transition and recognise ACCOs are best placed to meet the service needs and uphold the unique rights of Aboriginal and Torres Strait Islander children.

The sector has identified successful elements to support the transition of funding to ACCOs:⁴⁶

- A high standard of consultation with the community and relationship-building between ACCOs and mainstream organisations at a local level.
- The organisations involved in the transition are empowered to be flexible and tailor their transition approach in response to the needs and readiness of the community.
- A dedicated, tailored approach to transition in rural and remote communities to avoid exacerbating service gaps and competition for workforce.

SNAICC has partnered with the Allies for Children foundation organisations to transition and reunite Aboriginal and Torres Strait Islander children in their care to community control⁴⁷. The Allies for Children organisations have publicly committed to move away from competitive tendering processes for Aboriginal and Torres Strait Islander services for children, and to work alongside government to support the growth of the ACCO sector⁴⁸. The transition process is in design-stage; however, the previously identified successful elements will inform the approach taken by the Allies for Children organisations.

The role of the Department to support a successful transition

Both ACCOs and non-Indigenous NGOs want clarity and certainty about how the transition will work in practice and the support they can expect to receive from the Department. Successful transition requires the Department adopt a steward role. In practice, this looks like:

- Giving advance notice to the non-Indigenous child and family services sector that transition is a government priority and new funding settings will come into effect from mid-2026 when current FaC Activity contracts expire

⁴⁶ Families Australia 2024, 'Changing the Balance: Research Project Final Report', p. 8. Not published.

⁴⁷ Allies for Children members are Barnardos Australia, Benevolent Society, Key Assets, Life Without Barriers, MacKillop Family Services, Ozchild and Act for Kids.

⁴⁸ Allies for Children 2024, 'Position Statement: The thriving futures of Aboriginal and Torres Strait Islander children can be realised when they grow in community, in culture and with kin'. Retrieved from: <https://www.alliesforchildren.org.au/resources/position-statement-september-2024>.

- Partnering with Aboriginal and Torres Strait Islander peak bodies to communicate this intention to the ACCO sector
- Providing clear detail on the exact quantum and timelines for changes that are negotiated in genuine partnership with national peak bodies for both sectors
- Establish a dedicated transition fund for ACCOs to scale up and prepare to assume service delivery responsibility
- Develop a partnership framework to facilitate two-way knowledge and information sharing between non-Indigenous organisations and ACCOs
- Coordination with existing States and Territory transition plans
- Providing funding coverage for organisations in recognition that the transition process will incur additional short-term costs for all parties (including in human resources, data transfer, legal agreements, time taken to develop partnerships and transition clients).

It is important that governments, ACCOs, and non-Indigenous NGOs work together throughout the transition process and are each held accountable for their respective roles.

Question 11: What changes (if any) should be made to FaC children, youth and parenting programs to provide supports in a culturally appropriate and trauma-informed way?

Cultural safety for Aboriginal and Torres Strait Islander families is best achieved through the delivery of services by ACCOs. The ACCO sector is uniquely equipped to provide supports that focus on healing from trauma and building strengths within families. ACCOs provide culturally safe and supportive environments that connect children and families to culture and Country and break down the barriers that prevent access to the supports and services that families need.

SNAICC recognises that Aboriginal and Torres Strait Islander children and families may choose to engage with children, youth and parenting programs that are delivered by non-Indigenous organisations. As a result, the Department should support mainstream organisations to deliver their programs in a culturally appropriate and trauma-informed way.

The Cultural Responsiveness and Trauma Informed Practice Training (Waterways Training) is a solid step on this journey. This initiative was announced as part of the 2021 Commonwealth Closing the Gap Implementation Plan and aims to contribute to achieving Target 12 of the National Agreement and action 3c in the First Action Plan under *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*. Critical to this project is the centring of Aboriginal and Torres Strait

Islander worldviews and ways of knowing, doing and being. Through connecting with one another and with Country, SNAICC was guided to the significance of water, which inspired the re-naming of this project. Project Waterways is an acronym for Weaving, Anti-racism, Trauma-Informed, Education, Responsiveness, With Wisdom, Awareness, Yarning, and Solidarity.

SNAICC conducted a national survey of community service organisations to identify areas of improvement for organisations' cultural responsiveness and trauma informed practice⁴⁹. The key findings of the survey are summarised below:

- Responding organisations were more confident in their ability to embed trauma-informed practice (66%) and less confident embedding culturally responsive practice (52%) in their organisation
- Responding organisations were most familiar with cultural practices such as Welcome to and Acknowledgements of Country, NAIDOC week and Reconciliation weeks (80.5% confidence).
- Confidence fell to an average of 57.5% in questions that aimed to identify whether organisations have changed their processes and procedures to e.g. questions regarding the design of services aimed to reduce the ongoing impacts of colonisation, Aboriginal and Torres Strait Islander community partnerships, the value of lived experience and the centering of Aboriginal and Torres Strait Islander ways of knowing, being and doing.

The Waterways Training has been developed by SNAICC in partnership with AbSec – NSW Child, Family and Community Peak Aboriginal Corporation, KWW Aboriginal Corporation, Queensland Aboriginal and Torres Strait Islander Child Protection Peak, Victorian Aboriginal Child and Community Agency and independent consultants Yamurrah. This training aims to support 500 non-Indigenous community services organisations to confidently embed Aboriginal and Torres Strait Islander cultural knowledge, wisdom and practice within their organisations. The training is aimed at practitioners and management in order to engage people who possess authority within their organisation and can drive shift in processes and procedures.

Although this training is a positive step, standalone training is not going to produce the level of change required across organisations. A multilayered approach is required, tailored to the organisations' size, focus, current programs, and connection with Aboriginal & Torres Strait Islander children and families.

⁴⁹ The survey comprised of 46 questions in multiple choice and short answer formats. The survey has received 640 responses from organisations since its release on the 11th March 2024.

SNAICC strongly encourages greater uptake from the Department and their organisational staff in this work and would welcome the opportunity to partner the Department to support the delivery of more culturally appropriate services to children and families.

Question 18: Should the current Evidence Based Program requirement be changed? Would this be best done through the changes proposed above or through another approach?

The current Evidence Based Program Requirement (EBPR) for CfC FP program must be changed because it disadvantages ACCOs and their culturally informed model of care. Currently, there is no option for ACCO-delivered programs to be assessed using indicators developed by Aboriginal and Torres Strait Islander people. The result is that current EBPR do not value the cultural knowledges, practices and theoretical frameworks that set ACCOs apart from mainstream organisations, in terms of outcomes for Aboriginal and Torres Strait Islander children and families. The EBPR can result in the imposition of Western ‘evidence-based’ programs on Aboriginal and Torres Strait Islander communities. This drives the disengagement of families and places ACCO delivery partners in a compromising position as they are accountable to their communities.

As demonstrated in the Stronger ACCOs, Stronger Families research, ACCOs are further disadvantaged in procurement processes by the lack of investment in Aboriginal and Torres Strait Islander-led research and evaluation to measure and publish program outcomes. In late 2024, the Early Childhood Care and Development Policy Partnership commissioned a consortia of Aboriginal and Torres Strait Islander research organisations to develop an Evidence Guidance Framework⁵⁰. The purpose of this Framework is to build a shared understanding between governments, ACCOs and communities regarding evidence and best practice in child and family support services for Aboriginal and Torres Strait Islander children and families. The framework is expected to be delivered to the Policy Partnership in late 2025. It should then be used to inform how the Department considers and uses evidence in the context of child and family services.

SNAICC is partnering with the Australian Institute for Family Studies to broaden the range of evidence-based programs in line with Aboriginal and Torres Strait Islander ways of knowing, being and doing. CfC FP is one of the single largest funding streams administered by the Department to support child and family wellbeing. An expanded and culturally responsive EBPR will complement the

⁵⁰ The consortium is the Queensland Aboriginal and Torres Strait Islander Child Protection Peak, the Jumbunna Institute for Indigenous Education and Research at the University of Technology Sydney and Professor Cath Chamberlain.

Department's efforts to transition a greater proportion of existing FaC Activity funding to the ACCO sector.

Response to Evidence Paper

The key data on ACCO service delivery and First Nations focused services presented in the Evidence Paper conflicts with evidence SNAICC has provided in this submission regarding the effectiveness of FaC Activity-funded programs in Aboriginal and Torres Strait Islander communities.

The Department should partner with SNAICC and ACCOs to develop culturally responsive outcomes measurement tools as an alternative to current reporting requirements through the Department's Data Exchange (Recommendation 13). DEX SCORE data should not be used to evaluate program outcomes for Aboriginal and Torres Strait Islander children and families who are engaged in FaC Activity-funded programs. The 2020 independent evaluation of Department-funded IFSS programs found DEX data reporting requirements are "inadequate" in their design to provide insights into the efficiency of their program⁵¹. IFSS service providers struggled to match the DEX reporting categories to their work with children and families, because there was no dedicated category to capture informal engagement with communities, or engagement with other services⁵².

In the Evidence Paper, the Department equates the results of SCORE with the Closing the Gap socio-economic outcomes to demonstrate positive improvements in goals and circumstances for Aboriginal and Torres Strait Islander children and families⁵³. This is not a suitable 'like-for-like' equation. The Closing the Gap outcomes were negotiated and agreed in partnership with the Aboriginal and Torres Strait Islander community. In contrast, the SCORE approach does not measure if a service has strengthened the child and/or parent's cultural identity, which is a key determiner of the Aboriginal and Torres Strait Island child and/or parent's engagement with a program.

Non-Indigenous service providers give their SCORE data directly to the Department, without assurances that Aboriginal and Torres Strait Islander communities and researchers were involved in data collection and analysis. This process contradicts Indigenous Data Sovereignty Principles and Priority Reform 4 in the National Agreement. There are a range of known factors that impact the quality of data in these circumstances, including the inherent conflict of interest in provider generated

⁵¹ Social Compass 2020, 'Evaluation of the Intensive Family Support Service', p. ix. Retrieved from: <https://www.dss.gov.au/system/files/resources/attachment-c-ifss-final-evaluation-report.pdf>.

⁵² Ibid, p. 36.

⁵³ Ibid.

data that may impact future funding for services and the well-founded fears of Aboriginal and Torres Strait Islander families that reporting negative outcomes and feedback to service providers will result in increasingly intrusive intervention and child protection removals.

In concert with transitioning existing FaC Activity funding to the ACCO sector, the Department should partner with Peaks and ACCOs to design an outcomes measurement framework that is a culturally responsive and an appropriate alternative to current reporting via the Department's Data Exchange. This should be informed by the Early Childhood Care and Development Policy Partnership Evidence Guidance Framework.

Conclusion

SNAICC's submission has highlighted that the current suite of FaC Activity programs is misaligned with the Commonwealth Government commitments under the National Agreement on Closing the Gap, and Safe and Supported, and is not delivering strong outcomes for Aboriginal and Torres Strait Islander children and families. These programs have been rolled out in Aboriginal and Torres Strait Islander communities without the appropriate level of community ownership and an understanding of cultural determinants of health and wellbeing for Aboriginal and Torres Strait Islander people.

The FaC Activity review is an important opportunity to substantially increase the level of Commonwealth child and family services funding to ACCOs. This is the most powerful lever to strengthen program outcomes for Aboriginal and Torres Strait Islander children and families. Aboriginal and Torres Strait Islander self-determination in program design, delivery and evaluation will achieve strengthened outcomes for communities and prevent funding being directed to ineffective programs. The Department's decision to extend existing FaC Activity contracts FaC in 2021 has stalled progress towards Closing the Gap Targets 4, 12 and 13 and undermined the Department's commitment to Priority Reform 2.

SNAICC urges the Department to signal its intention to recommission services and transition funding as early as possible. It is vital the Department provides advance notice to the ACCO, and non-Indigenous child and family services sectors and works with Peak bodies at the national and jurisdictional levels to plan the transition.

Appendix A – Key resources to support the transition to ACCOs

Genuine Partnerships resources

SNAICC's Genuine Partnerships resources, audit tool, training program and guidance materials support genuine partnership of non-Indigenous providers and government agencies with ACCOs to facilitate increased service delivery roles and funding transfer to ACCOs.

Genuine and respectful partnerships between Aboriginal and Torres Strait Islander community-controlled organisations and non-Indigenous service providers have multiple benefits.

The following resources to support genuine partnership are available on SNAICC's website:

- **Creating change through partnerships** – An introductory guide to partnerships between Aboriginal and Torres Strait Islander and non-Indigenous organisations in child and family services. This SNAICC resource provides guidance to services on how best to develop and maintain genuine partnerships between Aboriginal and Torres Strait Islander and non-Indigenous organisations.
- **Applying for funding** – A guide to best practice partnerships between Aboriginal and Torres Strait Islander and non-Indigenous organisations. SNAICC guide has been designed to support Aboriginal and Torres Strait Islander and non-Indigenous organisations to consider and adopt partnership-centred approaches when applying for funding for Aboriginal and Torres Strait Islander child and family support services.
- **SNAICC's Genuine partnerships audit tool** – This SNAICC audit tool has been created to support inter-agency partnerships in child and family service delivery for Aboriginal and Torres Strait Islander children and families. It provides a framework for measuring progress towards achieving genuine partnership goals and can be used at all stages of partnership development.
- **Webinar between Kurbingui and Mercy** – This webinar records a conversation between Kurbingui and Mercy's Yadeni Tago partnership, discussing their key learnings and helpful tips for those wanting to engage in a partnership.

SNAICC's partnership resources helped us to be really clear about what our primary and core objectives are as individual organisations and as partners, beyond our everyday service delivery. In our partnership we share all our resources, so much of what we do is

integrated, so ensuring that we have a plan and know what the bigger picture is really is crucial for getting outcomes for our communities.’ Kurbingui

Kids come First: ACCO Leadership Transition Framework

SNAICC’s ACCO Leadership Transition Framework was developed to inform and guide the transition of the Connected Beginnings backbone role from non-Indigenous organisations to ACCOs, where there is agreement and support from the community.

It also provides tools to help determine readiness for transition, strengthen partnerships, and to support project handover and evaluation. The ACCO Leadership Transition Framework has been developed in partnership with ACCOs who have high levels of cultural expertise and non-Indigenous backbone organisations who are aware of the implications of transition for self-determination and supportive of the transitioning backbone functions to ACCOs.

Guiding Principles of Transition

The principles in the ACCO Leadership Transition Framework are drawn from existing bodies of SNAICC work in conjunction with consultation with Aboriginal and Torres Strait Islander people and Connected Beginnings communities.

The principles offer a shared language providing scaffolding for ways of working together and when adopted, can ensure accountability, support relationships and guide behaviour. The principles are:

1. Kids Come First
2. Centre Aboriginal and Torres Strait Islander Ways of Knowing, Doing & Being
3. Accountability to Community & Governance Groups
4. Cultural Safety
5. Commitment to respectful, reciprocal partnerships
6. Restorative Partnerships
7. Resourcing ACCOs to get the job done

A clear and transparent understanding of the resources and capital is integral in the partnership process. This may include:

- Agreements that clarify commitments, roles and accountability ensuring there is a level playing field between the two partners
- An understanding of the time and resources allocated to joint planning, review, and partnership development for each organisation

- Reallocating resources in fair, equitable and culturally safe ways
- Advocating with the Department of Education for additional resourcing of ACCO's and streamlined funding processes, acknowledging the fact that funding application processes can drain staff resources and time

Leadership Transition Framework: Recommendations for Transition

- Remove bureaucratic barriers where possible – for example, compliance demands, funding arrangements, and government regulations
- Capacity building at the community level through infrastructure, training, mentoring, technical support and workforce development where requested by the ACCO
- Negotiate long-term, adaptable funding so initiatives can be developed properly and have time to work
- Examine power relations and address systemic racism - Projects were enhanced when the power dynamics influencing the relationships between stakeholders were acknowledged and addressed throughout the course of the project.
- Create a supportive policy context – such as changes to funding guidelines which support building ACCOs' organisational capacity or decrease in administrative burden
- Have realistic timeframes regarding how long a transition takes and be clear about expectations and requirements early on
- Be flexible in timelines, program guidelines, funding, and operations
- Ensure transparency through timely sharing of information

The Stronger ACCOs Stronger Families Report

The Stronger ACCOs Stronger Families Report identifies significant systemic barriers that ACCOs face in accessing funding within the Families and Children Activity program administered by the Department and has lessons and recommendations that can be applied across children and family services more broadly.

Barriers include competitive grant processes that advantage larger non-Indigenous organisations, reporting and administrative burdens that are not supported by core functions funding and the fundamental misalignment between how services are funded, and the services communities need.

ACCOs identified that dedicated, sustainable, flexible and sufficient funding would enable them to build on the existing strengths of the sector to deliver culturally responsive and holistic services. By addressing these barriers to access funding, a greater number of ACCOs will be able to provide services for Aboriginal and Torres Strait Islander children and families.

ACCOs deliver services using a holistic model of care resulting in better health and wellbeing outcomes for Aboriginal and Torres Strait Islander children and families. They are accountable to their communities and thus deliver high quality, responsive and culturally safe services, and their position as a preferred provider in their communities ensures higher levels of engagement with service users. Current approaches to funding do not support ACCOs to provide services in this way. Without appropriate funding, ACCOs are limited in their ability to meet the objectives of the National Agreement in achieving better outcomes for Aboriginal and Torres Strait Islander children, families, and communities.

Commonwealth Government determining the way programs and services are delivered diminishes self-determination for ACCOs, and often does not align with community needs and aspirations.

The Report, including Recommendations for implementation can be found on SNAICC's [website](#).

Implementation of the Report recommendations was a Year 1 Priority of the Early Childhood Care and Development Policy Partnership. This priority has carried over into the Partnership's third year of operation. In July 2024, the Partnership approved fifteen new priority areas for work. Priority 1A adopts a targeted focus on child and family services funding reform⁵⁴. As a Partner agency of the ECCDPP, the Department has committed to implement The Stronger ACCOs, Stronger Families Report recommendations through Priority 1A:

Increase the proportion of child and family services funding to ACCOs with consideration to the proportion of Aboriginal and Torres Strait Islander children involved in child protection systems, across Commonwealth and jurisdictions in line with the recommendations of the Stronger ACCOs, Stronger Families Report (SASF) and Family Matters Report.

⁵⁴ [Outcomes summary from Meeting 7 - Department of Education, Australian Government](#)

Appendix B – Jurisdictional case studies of funding transition featured in the National Child and Family Investment Strategy

Case study: Implementing Delegated Authority Across Queensland

The delegation of functions and powers under the *QLD Child Protection Act 1999* is a major initiative under *Our Way: A generational strategy for Aboriginal and Torres Strait Islander children and families – 2017-37* a shared commitment to eliminating the over-representation of Aboriginal and Torres Strait Islander children and young people in statutory child protection and ensuring they grow up safe and cared for with family, in community and connected to culture, within a generation. QATSICPP and the Queensland Department of Child Safety, Seniors, and Disability Services (DCSSDS) partnered to develop and deliver a 10-year blueprint for implementing Delegated Authority across Queensland. The blueprint considers the readiness, priorities and needs of local communities and to families wishes and aspirations. The last Queensland budget committed over \$100 million to the roll out of Delegated Authority across Queensland providing significant funding for Community Controlled organisations across Queensland to lead this work.

Embedding Self determination

QATSICPP and DCSSDS have formed a strong partnership over the past four years with both establishing Delegated Authority teams to implement this significant change effectively.

With the increased funds came a significant opportunity to build on the work that had occurred in establishing Delegated Authority in two early adopter sites over the past four years. Key lessons learned from this work informed the process. It was also recognised that the established and strong partnership between QATSICPP and DCSSDS would allow for a different approach to commissioning these funds to grow the work across the state.

Instead of instigating a regular procurement process that was competitive in nature and called for tenders, it was agreed with QATSICPP and the Community Controlled organisations that the best approach was for a collective discussion that would enable Aboriginal and Torres Strait Islander organisations to decide how to implement in their region and locality the timing and process for taking on this new work and investment.

QATSICPP's strong relationships with its members, the lead Aboriginal and Torres Strait Islander children's services across the state meant that they could convene members quickly and efficiently to come together and conduct meetings that were culturally safe and respectful.

Partnerships

As a part of this process QATSICPP partnered with DCSSDS from the onset to provide Delegated Authority Information Sessions targeted at CEOs of Community-Controlled organisations. This included sharing data snapshots to unpack the number of Aboriginal and Torres Strait Islander children in each community and region. This provided CEOs the opportunity to consider the need in each of their communities and if they had the capability and capacity to take on this work.

QATSICPP and DCSSDS provided numerous information sessions with CEOs and their staff to:

- Increase their knowledge and encourage them to consider their capabilities
- Facilitate open and transparent conversations about what is available to support them
- Funding allocations and resources
- Tender processes and funding agreements
- Gauge interest in taking on Delegated Authority
- Connect CEOs with similar catchments to decide boundaries and readiness

These sessions provided ATSICCO CEOs the opportunity to decide if they were ready and able to take on Delegated Authority. Some of their considerations included:

- Alignment to organisation strategic objectives
- Existing capability vs capability needs
- Appropriate levels of funding and resources

By working together QATSICPP and DCSSDS were able to provide all the information to ATSICCO CEOs to make informed decisions on what was right for their communities.

At the end of each session the DCSSDS staff left the session, and an Aboriginal and Torres Strait Islander led discussion was held. This allowed CCOs to speak freely and to collectively discuss the willingness and ability of each organisation to take the opportunities of DA in the near-, medium- or

longer-term future. It also enabled organisations to think about collaborations and to look at how they could work across areas in the best way to provide greater choice for families and children.

These discussions ensured that a self-determining process for allocation of resources and readiness was supported. Those organisations ready entered into a contracting negotiation with the DCSSDS with a clear sense of purpose and vision for the implementation of the program. This process has meant that in a record time of 12 months ten additional sites for delegated authority have come online, with another seven planned in the coming months.

This proves that when governments work with Aboriginal and Torres Strait Islander peaks to build strong partnerships that First Nations knowledge, wisdom and processes can work together to ensure that we can deliver rigorous and robust procurement process that embody Aboriginal and Torres Strait Islander ways of knowing being and doing, leading to more effective and efficient outcomes.

Enablers of success include:

- Shared vision – everyone needs to be on the same page
- Solid commitment from all levels within DCSSDS - shifting government thinking
- Self-determination – allowing ATSICCOs to decide if and when they were going to take on Delegated Authority.
- Information sharing – building capability and knowledge.
- Partnerships – leveraging from QATSICPPs strong relationships with ATSICCOs and DCSSDS
- Strong relationships – between QATSICPP and DCSSDS and ATSICCOs. Constantly engaging in information sharing and decision making and QATSICPP being the conduit between government and the community.

For more detailed information on the implementation of Delegated Authority post the early adopter sites see: [Blueprint – Reclaiming Our Storyline – Transforming systems and practice by making decisions in our way - QATSICPP](#)

Outcomes

Since the implementation of the delegated authority in Queensland there have been 36 children reunified with their families. And as of July 2024:

- There are 12 different organisations in 20 different locations – working with 20 different Child Safety Service Centres under Delegated Authority.
- There are 198 children and young people subject to Delegated Authority.
- The decisions that have been delegated to date include – Family Time (87), Cultural Connection (88), Placement at home with parents (82(2)), Removal from carer's care (90), Case planning (51), Information Sharing (159), Transition from care (75).

Case study: Connected Beginnings transition to ACCO leadership

The Connected Beginnings program (CB) has been operating since 2016 to support school readiness of Aboriginal and Torres Strait Islander children aged zero to five, by integrating education, health and family support services. Each CB community has a backbone organisation responsible for key aspects of shaping projects' direction and coordinating the response to families with children in their early years.

To align with commitments to Priority Reform 2 under the National Agreement on Closing the Gap, the Department of Education, through partnership with SNAICC, aims to transition funding from non-ACCO led backbone organisations to ACCOs. After just a few years of dedicated effort, SNAICC, in partnership with the Department of Education (DoE), has supported the establishment of 50 CB sites across the country, with 33 currently led by ACCOs. Another 17 are planned to transition to ACCO leadership by 2025. That will be a change from less than 10% ACCO delivery, to 100% in a few short years.

The transition process is guided by the ACCO Leadership Transition Framework (ALTF) – which places cultural authority holders and the voice of community at the forefront of decision making. The framework outlines guiding principles and responsibilities for ACCOs and non-Indigenous organisations in facilitating the transition of backbone functions to ACCOs. The authenticity of the ALTF's application is what sets it apart from other tokenistic approaches to enshrining self-determination.

Connected Beginnings in Ceduna

CB has been operating in Ceduna since 2017. It has supported and guided an interactive, community-informed approach to build a sense of what might work best to address the specific needs of Aboriginal and Torres Strait Islander children and families and has laid the foundations for community-led systems change. The program supports families in several communities, including Ceduna, Koonibba, Scotdesco and surrounding homelands, as well as the transient members of the Yalata and Oak Valley (Maralinga) communities who often pass through Ceduna and Koonibba. Community members and a clear majority of stakeholder organisations have a clear understanding of CB's role in

engaging families and fostering collaboration amongst service providers to support school readiness.



Application of the ACCO Leadership Transition Framework

Ceduna is the second of two communities selected by DoE to trial a structured approach to the CB backbone transition process and showcases a rich example of the ALTF being applied in a pilot transition site.

Facilitated by SNAICC, community consultations were held to identify an Aboriginal organisation that has sufficient community support to engage families, and the operational capacity to take on the backbone role currently held by the Ngura Yalurirn Children and Family Centre

(NYCFC).

Before consultations began in community, there was extensive information sharing and pre-work to ensure that community and community leaders were best placed to provide informed feedback and contribute to discussions on the framework. This included sharing the framework with local ACCOs. Group discussions and individual interviews were held to ensure that all community members, early years organisations and ACCOs had the opportunity to have their say.

, Our Nannas group are the cultural authority holders, and we go to them for everything, including yarns about the framework.” - Project Officer Connected Beginnings NYCFC

SNAICC's approach to transition consultations undertakes the same approach and methodology used by SNAICC's CB Community Partner when exploring readiness for, and receptiveness to initiating a CB program in a new site. The conversation unfolds organically, and is guided by the following principles articulated in the framework:

Principle 2: Centre Aboriginal and Torres Strait Islander Ways of Knowing, Doing & Being

- This principle places the knowledge, cultural authority and self- determination of Aboriginal and Torres Strait Islander communities at the core of the transition process

Principle 3: Accountability to Community & Governance Group

- This principle acknowledges the accountability and cultural authority ACCOs hold in their communities regardless of what they are funded to deliver and implies the need for transparency in the operation of all aspects of CB projects, including the transition of backbone functions.

Responses from Elders, mothers with young families and stakeholder organisations including ACCOs have consistently supported the retention of backbone functions at NYCFC. Although community members determined that the CB site would remain with the non-ACCO, the process and methodology for arriving at this decision was driven by self-determination and cultural authority within the community.

Community led decision making at the heart of the work

Community self-determination in the choice of CB backbone is integral to families' engagement with the program. To ensure that the transition process aligns with the self-determined choice of the community, the recommendation for transition is always guided by a combination of factors, including:

- The recommended organisation is backed by cultural authority;
- Clear evidence that the recommended organisation is driven by community need and community input;
- Evidence that the organisation is non-partisan and generally well regarded by community;
- Clear understanding of the role of the CB programme and the role of the backbone organisation;
- Evidence that the organisation has capability to manage the program and its compliance requirements.

, We take connecting with community very seriously and ensure cultural authority is embedded in everything NYCFC does“ Project Officer Connected Beginnings NYCFC

More information on the framework and resources for how it can be applied can be found at [Kids Come First | Report | SNAICC](#).

END