



**Children, Young Persons
and their Families
(Advocacy, Workforce and
Age Settings) Amendment
Bill**

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PSA submission to Government Social Services Select Committee

Introduction

Who we are

The New Zealand Public Service Association Te Pūkenga Here Tikanga Mahi (the PSA) is the largest trade union in New Zealand with over 62,000 members. We are a democratic organisation representing members in the public service, the wider state sector (the district health boards, crown research institutes and other crown entities), state owned enterprises, local government, tertiary education institutions and non-governmental organisations working in the health, social services and community sectors.

The PSA has been advocating for strong, innovative and effective public and community services since our establishment in 1913. People join the PSA to negotiate their terms of employment collectively, to have a voice within their workplace and to have an independent public voice on the quality of public and community services and how they're delivered.

The PSA represents approximately 3500 social worker members who work in the government and community sectors. This submission has been informed by feedback to an anonymous questionnaire on the legislation sent to all our members who work as social workers (both inside and outside of CYF) and our members who work at MSD.

Comments from members that are quoted in this submission are derived from this feedback and are anonymous.

The PSA is an affiliate of the New Zealand Council of Trade Unions.

PSA submission

Part One: Summary of key points and recommendations

The PSA supports the intention of the CYF modernisation project: our members are motivated by the desire to deliver high quality public services and we agree that dramatic improvements in the services that are delivered to vulnerable children, young people and their whanau are necessary.

We support the proposed extension of the age of state care and protection to 18, and the introduction of mechanisms to enhance children and young people's participation in decision making, both at an individual and a system-wide level.

However, we are deeply concerned by both the nature and speed of the proposed workforce reform which is envisaged by this bill. We consider that there are significant risks associated with the amendment in this legislation that allows for the Chief Executive to delegate almost all social worker functions to other professionals and organisations, both inside and outside of the state sector. In essence, one of the overarching aims of this amendment appears to be to enable the widespread outsourcing of the core services currently provided by CYF. The bill's Regulatory Impact Statement, for instance, states that the reform is designed to move from "direct service delivery by employees of the agency to strategic partnerships over time (MSD 2016, p.10). Delivery by "strategic partnerships" should be read as outsourcing.

In our opinion the breadth of delegations allowed by this amendment poses an unacceptable risk to the safety and integrity of care and protection and youth justice systems as they could result in fractured, inequitable and unaccountable service delivery mechanisms.

We also believe that the broad nature of the proposed delegation contravenes the intention of the new delegation powers that were introduced to the State Sector Act 1998, whereby delegation of duties should be "selective" and should not result in the delegation of "substantial portions of their duties" (State Sector Commission 2014).

We understand the Government's desire to introduce radical reform. As many of our members will attest, multiple restructurings of the current child protection and young justice systems have occurred over successive years and none have managed to achieve profound and sustained change.

In 2013 and 2014 the PSA worked in partnership with CYF to undertake a workload and casework review. The review found that the ability of social workers to deliver quality social work services was impeded by, amongst other things, unhelpful performance management regimes and unmanageable case-loads (CYF 2014). We are disappointed that the Government has chosen to embark on another review of the system, rather than implement the robust recommendations for change contained in the workload and casework review. We argue that dramatic service improvements could be achieved within the current legislative framework if social workers were adequately supported and resourced to perform their duties.

This legislation provides the enabling mechanisms necessary to introduce the next and most substantial phase of reform: the establishment of a new agency and a new operating model. Government papers admit that this amendment has been developed under tight time frames and before detailed design work has been undertaken (MSD 2016, p.1). We believe that stakeholders should be consulted on the detailed change envisaged by the next phase of reform before being asked to support this enabling legislation.

In our assessment, the magnitude of risks to the service represented by this amendment is such that we oppose the amendment and urge the Government to delay reform so that adequate consultation and evaluation of the benefits and risks can be undertaken. We are not convinced that sufficient system analysis has been undertaken or that full consideration has been given to the possible consequences of the proposed delegation of duties. As the risks of service failure will impact most heavily on vulnerable children and their whānau, we argue that a slow and cautious is necessary to any reform of such a critical service.

Recommendations

The PSA:

- Supports the extension of the age of state care and protection to a young person's 18th birthday
- Supports the principle of a youth advocacy service;
- Agrees that the views of children and young people should be taken into account as part of decision making at an individual level and in the development of services and policy;
- Agrees that a multi-disciplinary and multi-agency approach to working with families is desirable but that this could be achieved within current institutional and legislative frameworks if agencies were sufficiently resourced to enable this.
- Agrees that value can be added to preventative, therapeutic and family support services through the involvement of the community, Māori and iwi organisations but that this can be achieved through current institutional arrangements;
- Opposes the amendments to the Act that will enable the Chief Executive of the new department to delegate social work powers and functions to other persons inside and outside of the state sector, as this is could:
 - jeopardise the safety and integrity of care and protection and youth justice systems by introducing fractured, inequitable and unaccountable service delivery mechanisms;
 - erode the core role of social workers in working with children and families both inside and outside of the state sector; and
 - lead to the outsourcing and privatisation of core functions of the state.
- Urges the Government to delay reform of CYF until adequate service design analysis and stakeholder consultation has been undertaken.
- Recommends that any commissioning of services outside of the state should only occur if the community is better placed to provide the service and must be underpinned by principles of "responsible contracting" which ensure high quality employment, health and safety, environmental and service delivery standards. This requires sufficient funding of the community sector.
- Urges the Government to follow the recommendations of the 2014 Workload and Casework review and introduce working conditions that will support and enable employees of CYF to perform their duties to their fullest capacity and capability. In particular this needs to include adequate funding to dramatically reduce social worker case loads and the elimination of management and reporting regimes that focus on cost reduction.

Part Two: General Comments

The PSA welcomes the Government's commitment to improving outcomes for vulnerable children and young people, and its recognition that this will require new investment. Our interest in this reform process stems from two places: our belief that strong, dynamic public services are a cornerstone of a healthy democracy; and our belief that well-trained, well-supported social workers are integral to any service that aims to achieve improved outcomes for vulnerable children, young people and their whānau. Our members also have a wider interest in social justice.

We agree with a lot of the analysis that sits behind the Modernising CYF work programme. In particular we agree with the assessment that the current children protection and youth justice systems are fractured and that the ability of social workers to perform their work has been compromised by stress, overwork, and risk-fixated management systems. We also welcome the government's recognition that additional investment is required. We agree that multi-disciplinary approach to working with children and their whanau is beneficial and that Iwi and other Māori, Pacific and community organisations are often best-placed to work with members of their communities. We are also pleased that the expert committee recognised the value of the CYPF Act and has recommended that its principles remain intact. As one of our members commented: *"The overall kaupapa of the reforms is encouraging, particularly extending the care age, increasing cultural competency across the sector, and using trauma-informed practice models"*.

Structural determinants of child abuse and maltreatment

The PSA is encouraged that the Modernising Child, Youth and Family expert panel recognised the underlying structural determinants of child abuse and maltreatment. Disappointingly however, there is no evidence in this bill - or any other current government work programme - that the government plans to introduce any policies that will address these structural determinants. Instead, funding for the new department is to be driven by a social investment approach which aims to reduce the "forward liability" to the state of maltreatment and vulnerability. This investment approach ignores the systemic underpinnings of child abuse and maltreatment and instead posits it as a problem of individual pathology to be solved on a case-by-case basis. While we support investment in evidence-based practice and therapeutic programmes for children and whānau, this alone will not eliminate inter-generational cycles

of abuse and maltreatment.

Institutional reform of public services may be necessary to transform child protection and youth justice services. However we are extremely concerned that unless analogous reforms are put in place to address the deep-seated economic, social and political inequalities that sit beneath child abuse and maltreatment, the latest round of restructures will fail to provide enduring and sustainable improvements in outcomes for vulnerable children and families. These concerns were expressed by some of our members in their responses to our questionnaire on this bill:

“My main concern is that the government does not acknowledge that poverty and rising inequality set the scene for child abuse. If the many causes of child abuse are not recognised then what hope have we of having a lasting impact on the lives of children? I predict that truck loads of money will be spent on services without stemming the flow of more clients requiring them.”

“It concerns me that this is not addressing the real issues which are the common underlying problems of addictions, abuse and dysfunctional families. I do not have the answers but more resources, more scrutiny put in much earlier on, even before children are born and/or conceived may be better than the ambulance at the bottom of the cliff. I don't think we need to make any apologies for getting involved when there is any doubt about the safety about our children, our future.”

The PSA recommends that to be effective, the reforms to CYF must be accompanied by policies that address the following factors:

- Income inadequacy, for parents and caregivers in paid and unpaid work;
- Improved working conditions and strengthened workers' rights;
- Policies to reduce the impact of debt on people's lives;
- Access to affordable, quality housing
- Access to well-funded, high quality mental health and addiction services that support parents to overcome barriers to caring for their children.

Part Three: Specific initiatives

Age Settings

The PSA supports the amendment to the CYPF Act to extend the age of state care and protection to a young person's 18th birthday. However, the new agency will need to be sufficiently funded to meet the additional costs associated with this policy change. Costings will need to reflect the specific challenges and complexities of delivering services to an older age group.

Enhancing children and young people's voice at an individual and systemic level

We support changes that will strengthen the voice of children and young people in decisions that affect them individually and at a system level. Empowerment is the governing principle of the CYPF Act and we welcome moves to embed and extend this principle in the legislation. We note child and youth participation is already a core requirement of the CYPF Act that is often overlooked due to pressure on social workers. We also urge the Government to consider the establishment of a parental/whanau advisory group.

Vulnerable Children Workforce Settings

The legislation introduces an amendment to the CYPF Act that would allow the Chief Executive to delegate almost all current social worker functions to any individual (or organisation) inside or outside of the State Sector. This represents a radical restructuring of the child welfare system that may bring benefits but that also carries significant risk. Our members have identified some possible benefits of the proposed reform, however they are overwhelmingly concerned by the potential for significant service failure arising from the reforms. The appendix to this submission shows member comments on the proposed workforce reform, including the identification of some benefits. The following section details what we consider are to be the main risks of the proposed reforms.

We see the most critical of these risks are that:

- core child protection and youth justice functions could be divided amongst a group of disparate individuals and organisations, including not-for-profit, and for-profit non-government organisations. This may result in under-funded, fractured, unaccountable and inequitable delivery of critical services (including notification, investigation and child removal). Rather than the single point of accountability envisaged by this legislation, accountability for service delivery would be dispersed amongst multiple organisations. This may create confusion amongst the public and amongst practitioners.

- the dispersal of core CYF social worker functions to a disparate range of professionals, with their own professional frameworks, definitions and principles, may undermine the modernising panel’s aspiration to implement a single, system-wide professional practice framework¹. Statutory child protection social work requires specialist skills and training – we fail to understand how this core work could be safely undertaken by people who aren’t trained in this area.
- the core and unique role of social workers will be gradually eroded over time, with social workers gradually being replaced by a range of professionals untrained in statutory child protection work. This will lead to a tremendous loss of knowledge, skill and experience.
- the role of social workers in the state agency may be narrowed over time to the execution of the most coercive functions of the state.
- the use of non-state actors as a primary mechanism for delivery of such critical services ² will weaken the ability of state institutions to recoup the role should external provision fail;
- it allows for the outsourcing of core functions of the state to for-profit private providers, who will be motivated first and foremost by the need to return a profit.

The key policy drivers of the reform are to:

- create a single point of accountability for vulnerable children and young people;
- enable flexibility for a future agency to deliver services via strategic partners; and
- enable a broader set of professionals to perform key functions under the CYPF Act (MSD 2016)

Whilst we agree that there are benefits to be accrued by engaging a broad range of professionals in the delivery of services to vulnerable children and whānau, and we also agree that partnering with Māori, iwi and community organisations is essential, we consider that this can and should be achieved within current legislative and institutional parameters. The Children’s Teams, for instance, which were introduced through the recent Children’s Action Plan work programme, are charged with exactly this kind of multi-agency, multi-disciplinary approach. The Children’s Teams provide “the opportunity for practitioners and professionals in government agencies, iwi and non-government organisations to bring their services

¹ See Modernising CYF Expert Panel’s final report (2016).

² Ibid

together into one personalised plan for each child and their family/whanau” (Children’s Action Plan).

Our members are concerned that this proposed delegation of core social worker duties fails to recognise the highly specialist skills and training required to undertake statutory social work. They are also concerned about issues such as professional disagreements on the best practice approach, and how sensitive data on families will be treated and shared. The following comments highlight some of these concerns.

“I do not see why a collaborative approach between services cannot be attained without the need to compromise quality statutory social work practice. Statutory SW is not the same as community SW. There is a high degree of expectation that cannot be easily be ensured at a community level. - It gives child abuse and protection less importance when minimised to community rating and not maintaining the importance at a statutory level”.

“What is the process of the state and other agencies if they do not agree on how to resolve matters, i.e. a therapist believes that a child requires a particular intervention but the state agency does not agree, or other community agencies involved do not agree? Who will coordinate this? If the intake system is diversified what process will be in place to ensure that those dealing with a family know the whole history of social intervention with the family? This is critical to doing a thorough assessment”.

We are concerned that the proposed delegation powers are too broad and risk endangering the safety, integrity, quality and viability of essential child protection and youth justice services. In our opinion this very broad delegation of duties proposed by this amendment is beyond the scope of the CE delegation powers envisaged by the 2013 amendments to the State Sector Act 1998. Section 7 of the SSC guidance to Chief Executives that accompanies the legislation states that:

Chief executives are not expected to suddenly open the floodgates and start delegating substantial portions of their functions (SSC 2014)

With very few limits on the delegation powers proposed by this bill, we do consider that it gives the CE the power to delegate “substantial portions of their duties.”

Outsourcing and decentralisation

As noted above, one of the key policy drivers for this amendment is that it maximises the

ability of the CE to develop “strategic partnerships” both inside and outside of the state sector for the delivery of services. Policy papers show that other, less radical, options for reform of the delegations were rejected on the basis that they could not deliver the desired degree of flexibility required to develop these strategic partnerships³.

Fundamentally this amendment allows for the widespread outsourcing of duties that are currently the preserve of CYF: this is one of the overarching aims of the Modernising CYF reform programme. The RIS states, for instance, that the reform is designed to move from “direct service delivery by employees of the agency to strategic partnerships over time (MSD 2016, p.10). “Strategic Partnering” should be read as code for outsourcing. This could entail, for instance, that persons working for private or community organisation could be delegated to receive notifications, undertake investigations, etc.

As noted above, we strongly believe that government should be acting collaboratively with Iwi and other Māori organisations and community groups. However we believe that outsourcing of core government services should only occur in instances where the community, rather than government is best placed to deliver these services. When they occur, outsourcing arrangements should be developed through collaborative partnerships and be sufficiently funded to allow non-governments to adhere to high quality employment, health and safety, environmental and service delivery standards. When making a decision on outsourcing of core services, government must also take care not to underestimate the difficulties of delivering complex and integrated service delivery through the limited commissioning tools that are available.

Non-government organisations are often able to develop collaborative and trusting relationships with vulnerable whānau because theirs is a non-coercive and primarily supportive role. We would be concerned that this relationship could be compromised if, through the delegation of duties such as investigation and child removal, non-government organisations became essentially another arm of the state. This could create the unintended consequence of further isolating vulnerable children and whānau. One of our members commented that:

Statutory social work requires a special skill base and most social workers in the community do not have this skill set, families will sometimes work with community agencies but will not work with CYF so this compromises families’ decisions as to who

³ See MSD (2016) Regulatory Impact Statement

they work with willingly. NGO's do not want to be seen as an extension of statutory social workers

As with any external procurement regime, there would be risks around the monitoring, reporting and accountability of procured services. The government, intends, for instance, that this legislation will enable organisations other than CYF to deliver “elements of an intake system” (MSD 2016, p.9). While a decentralised approach may make notification and investigation services more accessible and responsive to communities, it may also lead to a fractured system, requiring complex monitoring and reporting regimes to ensure consistent and equitable service quality. As this is such a critical service, we would need assurances as to the capacity of the community to undertake these activities, as well as the capacity of the new department to sufficiently support NGOs to deliver robust services. One member commented that:

“I am concerned about the wide delegation given to the CE because it is like giving a blank cheque to people who probably are not professionally qualified or have not experienced the sort of work a CYF social worker has to do. Also this could lead to a fractured/localised service, where as many clients are very mobile moving around NZ. A national service is needed.”

We would be particularly concerned if the proposed delegations of duties was extended to private organisations. At the most benign level, private contractors could include child psychologists or therapists, and this is probably the intention of the current government, as the expert working group foresees a more trauma-focused model, with the involvement of specialists in trauma recovery. However a more worrying possibility is that it could open up the way for profit-motivated companies to become involved in delivering services. In the youth justice sector, for instance, this could enable private contractors to manage youth justice residential services.

The process of contracting out can destabilise and weaken state institutions; once this damage has occurred it is very difficult to repair. Contracting out also risks weakening our democratic oversight over core functions of the state, as accountability for service failure shifts further away from the Executive.

Research by the Australian Centre for Policy Development found that far-reaching outsourcing of employment services has eroded the capacity and the capability of the public service to respond to the needs of vulnerable citizens: “over the past two decades, outsourcing has led

the public sector to become disconnected from direct service delivery and increasingly lacking the expertise and experience to break down the complexity of human services, identify the key systemic challenges, and design a viable system that can robustly address disadvantage “(Farrow et al, p.39). The report concludes that: “A public sector that relies solely on purchasing services from other social service providers is likely to fall short – in part because it fails to leverage the special characteristics of government, and the valuable role the public sector can play” (p.58).

The provision of coherent, consistent, high quality and accountable child protection and youth justice services is critical to the safety and wellbeing of vulnerable children and whanau. We believe that this is best achieved by the public service. Furthermore, as many elements of child protection and youth justice services involve the use of the coercive powers of the state (such as the removal of a child) we believe that it would be highly problematic to extend these coercive powers to non-state actors. One of our members was also concerned about the cost-effectiveness of outsourcing:

Though it seems like worthy goals - esp with other agencies being involved, it still needs money. The public sector is the most reliable and cost effective way to provide social services and the reality is if given more resources internally, it could work. More agencies involved mean more money being spent on admin costs/setup rather than for front line work.

Speed of reform

We draw the Government’s attention report of the Australian Public Service Commission on tackling “wicked problems” which notes that collaborative strategies – which involve broad stakeholder engagement – are more effective than authoritative strategies in developing successful solutions to wicked problems: “A key conclusion of much of the literature about wicked policy problems is that effectively engaging the full range of stakeholders in the search for solutions is crucial” (Australian Public Service Commission 2012`).

Unfortunately, the Government appears to have used an authoritative rather than a collaborative approach in developing policy options for reform of CYF. There has been little consultation with front-line social work staff who have a wealth of wisdom, experience and insight to offer such a process. As one of our members noted:

Overall it is important that we are keeping children safe; that is the priority. I'm only sorry that a working party of front line social workers/supervisors were not included

in this review to share their ideas; they have so much knowledge and this was not tapped into. It is another example of a top down approach.

The haste to reform appears to have resulted in insufficient consultation with key stakeholders, including front line service delivery staff, and inadequate analysis of the consequences of the proposals. This point is acknowledged in the Regulatory Impact Statement (RIS) that sits behind this legislation (MSD 2016). Most alarming are the acknowledgements that:

- “the analysis has been undertaken within fairly tight timeframes ahead of detailed design work... this increases the risk of creating unnecessary degrees of flexibility....
- The limited consultation with affected agencies has meant that key affected stakeholders have not had an opportunity to shape the proposal, which presents an implementation risk that the proposal is perceived as undermining the role of [CYF] social workers...
- A general indication only of the relative scope and magnitude of the options’ operational implications has been provided, as this will depend on further detailed design work...” (MSD 2016, p.1)

While the RIS does outline strategies to mitigate these risks, we are nonetheless very concerned that legislators are being asked to support radical reform to core functions of the state before detailed design (including impact analysis) and stakeholder consultation has been undertaken. This legislation provides the enabling mechanisms necessary to introduce the next and most substantial phase of reform: the establishment of a new agency and a new operating model. We believe that stakeholders should be consulted on the detailed change envisaged by the next phase of reform before being asked to support this enabling legislation. As one of our members commented: “Sounds good however far too strategic. Not specific enough when the devil is in the detail”.

In our assessment, the magnitude of risks to the service represented by this amendment is such that we oppose the amendment and urge the Government to delay reform so that adequate consultation and evaluation of the benefits and risks can be undertaken. We are not convinced that sufficient system analysis has been undertaken or that full consideration has been given to the possible consequences of the proposed delegation of duties. As the risks of service failure will impact most heavily on vulnerable children and their whānau, we argue that a slow and cautious is necessary to any reform of such a critical service.

A comments from one of our members should act as a cautionary note:

“Babies and bathwater, I worry that they have underfunded the system for years and rather than provide more funding, they are doing a whole new thing that is unproven. My preference would have been that they took an honest look at what we have and made incremental changes as issues were identified”.

Workload and Casework review

The amendments to the CYPF Act proposed by this legislation represent significant workforce reform. This is likely to cause high levels of stress and upheaval for staff at MSD and CYF, many of whom have already experienced multiple restructures as successive governments have attempted to “fix” CYF. Additionally, many social work staff at CYF are already experiencing high levels of stress due to very high workloads and the often traumatic nature of their day-to-day work.

We are not convinced that the proposed workforce reform will bring about the service improvements envisaged by the Modernising CYF expert panel. Instead we urge the Government to implement the findings of the 2014 Workload and Casework Review. This would include the development of tools for determining safe caseload volumes and the employment of additional administrative staff to support social workers. One of our members commented that:

The service delivery can only be improved by providing more administration support for social workers to free up their time working together with other stake holders

In addition, the PSA considers that this reform process represents an opportunity to introduce working conditions that will support and enable employees of the new department to perform their duties to their fullest capacity and capability.

Our Transforming our Workplaces agenda, and its companion Nga Kaupapa - creating a better working life for Māori - provide a model for workplace relations that we recommend the Government adopt when establishing the new agency. The aim of Transforming our Workplaces is to create employment arrangements that support exemplary workplaces and underpin exceptional service delivery. We need workplaces where there is trust in the relationship between employees and managers and where everyone is supported to perform well, contribute and be productive.

There is a strong link between workplaces that are effective and productive and good

management where workers are trusted and have a strong voice. For all of this to happen we need workplaces where everyone has fair working conditions and a secure future and where their skills and career and safety, health and well-being are looked after. In order to deliver 21st century public services, employment relations arrangements must nurture the commitment of state servants to the wider cause of public service, facilitate whole-of-government practices and high-trust, effective, productive and innovative workplaces.

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References

Australian Public Service Commission (2012), "Tackling wicked problems: A public policy perspective", retrieved 19 July 2016 from <http://www.apsc.gov.au/publications-and-media/archive/publications-archive/tackling-wicked-problems>.

Children's Action Plan website, <http://childrensactionplan.govt.nz/>

Child, Youth and Family (2014), "Workload and Casework Review: Qualitative Review of Social Worker Caseload, Casework and Workload Management", retrieved from <http://www.msd.govt.nz/documents/about-msd-and-our-work/newsroom/media-releases/2014/workload-and-casework-review.pdf>

Farrow, Kelly, Sam Hurley and Rob Sturrock (2015), *Grand Alibis: How Declining Public Sector Capability Affects Services for the Disadvantaged* Centre for Policy Development, retrieved from: <https://cpd.org.au/wp-content/uploads/2015/12/Grand-Alibis-Final.pdf>

Ministry of Social Development (2016), "Modernising Child, Youth and Family: Vulnerable children workforce settings. Regulatory Impact Statement", retrieved from <http://www.treasury.govt.nz/publications/informationreleases/ris/pdfs/ris-msd-mcvc-jun16.pdf>

Modernising Child, Youth and Family Panel (2016), "Expert Panel Final Report", MSD, retrieved from <http://www.msd.govt.nz/documents/about-msd-and-our-work/work-programmes/investing-in-children/investing-in-children-report.pdf>

State Sector Commission (2014), "SSC Guidance: Delegations under Section 41 of the State Sector Act 1988", retrieved from <http://www.ssc.govt.nz/sites/all/files/state-sector-act-sec41-delegations-effective-april14.pdf>.

Appendix One: PSA members' comments on the proposed delegation of social worker functions

"The obvious concern for social workers is that their role will be diminished and/or dismissed as in the health sector where some social work roles have been relegated to nursing staff. I do believe it is important to take a fresh look at how we operate but my concern is this is more likely a cost cutting exercise and at the expense of the integrity of the service."

"One would like to think the CE who delegates responsibilities to outside agencies has the integrity to do so and history does not repeat itself as in the mental health, corrections and education".

"The intention is admirable yet the application is doubtful do we have resources in the community that can do the job or capable of doing safely. It appears a lot of wishful thinking has been considered without any real proof it can happen. It's a trial and error approach and who is prepared to be held accountable when they don't happen".

"[I] do not see why a collaborative approach between services cannot be attained without the need to compromise quality statutory social work practice. Statutory SW is not the same as community SW. There is a high degree of expectation that cannot be easily be ensured at a community level. - It gives child abuse and protection less importance when minimised to community rating and not maintaining the importance at a statutory level".

:It is concerning that statutory functions could be delegated out to non-governmental agencies, I disagree with this being done as it would definitely cause fractured services, leading to an inequality of services over areas of Aotearoa with the possibility of unqualified staff undertaking investigations, taking custody of children and attempting to work with whanau".

"There are additional risks associated with delegated authority. Currently all information held on CYF case files is the subject of the Official Information Act (OIA) and the Privacy Act. This allows parents and other interested parties access to information used in making decisions about their child. If this information is distributed across multiple agencies, possibly also ones to which the OIA does not apply, then will the information required for informed decision-making be available to whanau - especially when they disagree with what the "government" is telling them? Such information is also key to independent review (e.g. that provided Client Listening and Assistance Services)."

"I am always concerned when we talk about getting services via the community as we either don't pay enough to get quality services, or pay too much, and CYF could have done the same job with the same funding, but have been subject to government pressure to reduce costs for years."

"Babies and bathwater, I worry that they have underfunded the system for years and rather than provide more

funding, they are doing a whole new thing that is unproven. My preference would have been that they took an honest look at what we have and made incremental changes as issues were identified”.

“Children and families won't necessarily have state intervention for stressful and/or poverty type situations. This will be better dealt with by community organisations at that level. - CYF staff can get on with the core work of statutory intervention only, i.e. legislative - this has to be better for workers and families”.

“I can see both the benefits and risks in delegating services to other organisations - I think the more organisations in play to try and help our vulnerable children is good. However I can imagine there is a risk that information about children will be lost within the multi-organisation systems - we need to ensure all have access to up to date information, so if any one person/organisation is dealing with a person they have all the relevant information. This could be a big ask”.

“as long as it is adequately funded. That is everyone's concern currently and it has been Government practice in the past to implement new models and then not fully fund them meaning that what may have worked really well is yet again, fractured by lack of resource and disabling staff from doing a good enough job”.

“We are failing in the current system so we need to change - not try to fit the old into the new but actually start with a new system that can 'use' some of the old”.

“Statutory social work requires a special skill base and most social workers in the community do not have this skill set, families will sometimes work with community agencies but will not work with CYF so this compromises families decisions as to who they work with willingly. NGO's do not want to be seen as an extension of statutory social workers.”

“Skill base and resourcing [are key issues]. NGO are not prepared to have the challenging conversations and avoid the difficult stuff”.

“I am concerned about the wide delegation given to the CE because it is like giving a blank cheque to people who probably are not professionally qualified or have not experienced the sort of work a CYF social worker has to do. - Also this could lead to a fractured/localised service, where as many clients are very mobile moving around NZ. - A national service is needed.”

“The intent of the changes are sound though as I work across a largely rural area, I am concerned that isolated communities will not benefit from the changes, for example contracting out services. I am also aware that most smaller communities are unable to address the partnered response referrals owing to the increasing complexities of the whanau and young people”.