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AbSec submission on IPART consultation Paper to inform the:

IPART Review of Out-of-home care costs and pricing

About AbSec - NSW Child, Family and Community Peak Aboriginal Corporation (AbSec):

AbSec is the New South Wales peak organisation for Aboriginal children, young people, families and communities impacted by the child protection and care system. AbSec works to empower and protect the right of Aboriginal children and young people to grow up safe and cared for in family, community and culture, and on Country. Central to AbSec's work is supporting the contribution, development and growth of high quality and responsive Aboriginal Community-Controlled Organisations (ACCOs) to design and deliver the supports and services needed by their community. The understanding and experiences of our members and community informs all components – spanning policy advice, service design, research, and advocacy - of AbSec's contribution to reforming the NSW child protection and OOHHC systems.

For this submission:

We would welcome the opportunity to discuss our submission with you in greater depth. Should you have any questions, please contact the AbSec [REDACTED]

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Questions for all stakeholders

1. What are the key challenges you face in providing out of home care services?

a. How has the increased cost of living impacted the delivery of out-of-home care services? What cost increases have had the most impact?

AbSec will detail the challenges faced by Aboriginal Community Controlled Organisations (ACCOs) accredited to provide quality, tailored services to Aboriginal children and young people in out-of-home care (OOHC) in our responses to 'questions for NGO providers' (Questions 3 through 11).

The increased cost of living has had a significant impact on the recruitment and retention of the carers and staff who underpin the delivery of OOHC:

- **Carer recruitment and retention:** The shortage of carers has been exacerbated by greater financial pressures in many carer households flowing from higher costs of living, particularly the sharp increases in rents and mortgage payments. AbSec members report that some Aboriginal families who have previously provided, or were interested in providing, kinship care no longer have a room/s available for children as they share accommodation with more family members who cannot access affordable or social housing in their community.

It will be important for IPART to investigate the adequacy of Carer Allowance in meeting the everyday costs of providing care, and the adequacy of adjustments made according to a child's age and level of need.

Responses from Aboriginal carers will be important to informing this analysis. Examining the growth in the cost of the following household budget items (across 2021-22 and 2022-23) for Carers relative to the growth in Carer Allowance would be of value:

- Energy and utilities
- Food
- Clothing and footwear
- Health including private health insurance
- Household goods and services
- Transport
- Insurance
- Cultural connections and engagement
- Leisure and recreation
- Personal care

While the decision to be a Carer is not motivated by financial considerations, unmet costs of care impose greater stress on carers already experiencing financial pressure. Ensuring that Carers Allowance covers the true cost of providing care is vital to retaining carers who also play an important role in recommending caring and recruiting carers through word of mouth¹.

- **OOHC staff recruitment and retention:** Higher costs of living are also having an increasing impact on the ability of ACCOs to recruit and retain staff to deliver OOHC services. This is particularly so for caseworkers where staff and skill shortages are prominent. As workers and potential workers face increased financial pressure, the need to address equity in pay and conditions for staff carrying out the same roles across government and non-government services becomes more urgent. A new funding model needs to be

¹ Insight Consulting Australia, 2023, *The evaluation of My Forever Family NSW*, p.42, June.

transparent about the assumptions on salary levels for defined roles and justify any payment differentials between what DCJ pays to their own OOHC staff and the funding they provide to ACCOs and NGOs to employ staff in comparable positions.

2. What is the most important change you would like to see come out of our review?

The most important change, AbSec would like to see from the review, is a new funding structure based on the true costs – including direct, indirect and overhead costs – for ACCOs to provide high quality care that meets the needs of Aboriginal children and young people in OOHC and supports them to build a strong sense of identity and connections to kin, culture and country. The resources must accurately reflect costs associated with:

- Supporting cultural and relational permanency as foundations of ACCO practice and the currently unfunded or under-funded work with Aboriginal children and young people that aligns with *Aboriginal and Torres Strait Islander Child Placement Principles* and the *NSW Child Safe Standards for Permanent Care*.
- Recruiting and retaining a trained and supported workforce
- Financial sustainability of ACCOs that are accredited to provide OOHC or that are working towards accreditation

The review must also address how to properly support the viability of ACCOs in the context of ongoing uncertainty in the transition of Aboriginal children from non-Aboriginal NGOs to ACCOs. The current annual ‘Aboriginal Transition Support Payment’ (a fixed lump sum) and continuing failure of DCJ and NGOs to meet transition targets and timelines, creates ongoing dilemmas and risks for ACCOs who invest or want to invest in building their capacity to accept more intakes.

Questions for non-government providers

3. How has the Permanency Support Program (PSP) impacted the way out-of-home care services are delivered by your organisation?

As a peak Aboriginal organisation representing the majority of ACCOs providing accredited OOHC, this is not a simple question to answer. The way different ACCOs deliver OOHC services depends on the spectrum and adequacy of the Case Plan Goal, Baseline, Child Needs and Other Specialist packages that make up their funding and whether their true costs align with the ‘average costs’ on which package funding is based. We argue that providing quality and culturally appropriate care to Aboriginal children and young people involves a series of different costs (see responses to Questions 4, 5, 6 and 11) and requires IPART to establish higher benchmark cost assumptions for ACCOs. The capacity of ACCOs to implement the assumed flexibility in PSP service delivery through using pooled funds varies significantly depending on organisation size and location, placement numbers and case mix, and whether the ACCO is established or newly accredited. We will discuss the ethical dilemmas and financial difficulties, that inadequate funding for child needs and different specialist packages create for ACCO providers of OOHC.

The complexity of the PSP design and the lack of core program funding has meant that more ACCO time has had to be devoted to increasingly top-heavy administration, financing, compliance, governance and accreditation activities. This was a key finding of the *Evaluation of the PSP*, conducted for DCJ by the Centre for Evidence and Implementation in 2023². Despite best efforts, our caseworkers and other direct care staff need to spend more time reporting at the expense of spending time building relationships and completing quality casework with

² Rose V, Jacob C, Roberts J, Hodgkin L, Shlonsky A, Kalb G, Meekes J, Etuk L & Braaf R. 2023. *Evaluation of the Permanency Support Program: Final Report*, Centre for Evidence and Implementation, p. 124.

families. The funding of PSP packages does not provide resources which reflect differences in the time and effort required to support relational and cultural permanency and wellbeing outcomes for Aboriginal children and young people according to their safety needs.

AbSec urges IPART to unpack what packages currently assume about the time and cost required to fulfil contractual obligations and meet the *NSW Child Safe Standards for Permanent Care* and to look at a funding model that provides transparency on management, compliance and administrative costs and how these are best structured in organisational funding.

The commitment to support the transition of Aboriginal children in OOH from non-Aboriginal NGOs to ACCOs has had complicated impacts on the way our members deliver OOH services. The commitment recognises that ACCOs are best placed to provide case management services and uphold the self-determination and cultural connections of Aboriginal children and families. However, the small numbers of children being transitioned and the ongoing lack of certainty around the transition process and timelines have seen some ACCOs carrying significant financial risk.

There is no transparency around the basis on which a fixed annual 'Aboriginal Transition Support Payment' of \$150,000 for each ACCO has been derived. In a scathing Performance Audit of the NSW child protection system released in June 2024, the NSW Audit Office noted that:

Throughout 2023, some Aboriginal Community Controlled Organisations have been upscaling their businesses to prepare for the transition of Aboriginal children to their care. They have employed additional caseworkers and enhanced administrative and infrastructure arrangements to take on new children, without receiving new intakes. They report that they have been financially disadvantaged by the failure of the transition process. Aboriginal Community Controlled Organisations advise that they don't expect confirmation of the child transition process and timelines until 2024 and must carry the financial consequences of upscaling.³

4. Does the current package-based approach make it easier or harder to deliver services to children and young people and why? How well does the funding of the PSP packages reflect the cost of providing care to a child? Are there any particular packages or service types which do not cover the cost of providing care?

The PSP funding model correctly assumes that for many cases allocated to PSP providers, the resources required to provide quality care and the needs of the child will vary over time. However, what the model wrongly assumes is that providers will be able to allocate unused funding from one case to another if, for example, they have cases where resources are not in line with the complexity of needs. To understand the difficulties and dilemmas created by the current package-based approach requires us to start with whether funding provided for the packages or service types ACCOs deliver are grounded in the resource levels and caseworker time required to meet what the package aims to achieve for each child and young person.

At the present time, no ACCOs are delivering Intensive Therapeutic Care packages although some have been awarded in the latest tender round. Thus, ACCOs have been receiving 'Aboriginal Foster Care' (only available to accredited Aboriginal organisations) as their principal Baseline Package received. The funds provided for Aboriginal Foster Care is only \$1,734 per child per annum⁴ higher than for the Baseline 'Foster Care' package despite the additional costs we identify in response to Question 11\). This small difference points to a fundamental discord with the Department's Aboriginal Case Management Policy.⁵ It fails to understand that the effects of colonisation and intergenerational trauma mean that providing quality care to Aboriginal children and young people, and maintaining their connections to culture and community, requires significantly greater

³ NSW Audit Office, 2024, *Oversight of the Child Protection System*, Performance Audit, 6 June, p.27.

⁴ NSW Department of Communities and Justice (DCJ), *Permanency Support Program rates – Effective from 1 July 2023*.

⁵ NSW Government, 2018, *Aboriginal Case Management Policy - Strengthening Aboriginal families, delivering outcomes for Aboriginal children and young people*, October.

casework time to build trusting relationships and cohesive connections with *extended* family and community than does work with non-Aboriginal children and young people.

The levels of Child Needs Packages and the differences in the amount (per child per annum) to support a child with low needs versus medium needs (an additional \$3,117) and medium needs versus high needs (an additional \$4,782) requires urgent attention. The level of funding for low, medium and high needs must be based on evidence of the types and frequency of services each child and young person is likely to require in order that ACCOs can address their needs and fulfil the *NSW Child Safe Standards for Permanent Care* in service domains including social and emotional wellbeing, health, education, and behaviour support.

The scathing Performance Audit of the NSW child protection system released by the NSW Audit Office in June 2024⁶ acknowledged non-government provider concerns that the payments are not sufficient to address the needs of many children in OOHC. In these contexts, DCJ points to the availability of specialist 'Complex Needs' packages where providers can make a claim for exceptional circumstances where additional services and supports are required to meet a child's exceptional needs. These are determined on a case-by-case basis for a defined period. The Audit Office found that DCJ declined 53% of the NGO complex needs applications that were finalised from November 2022 to January 2023.

AbSec points IPART to a critical observation made by the Audit Office about the assumptions on costs of providing needs-based care that must be updated:

In 2017, DCJ undertook a detailed study to determine the unit price for the different out of home care services. The study included discussions with stakeholders, process and service mapping, and data analysis. The child needs packages were based on estimations of the differing numbers of sessions that a child would require according to the level of their need. The service types included educational support, allied health services, mentoring, counselling, psychology, psychiatry, and behavioural therapy. Between 2020–2021 and 2022–2023, DCJ increased the service unit prices by nine per cent but has not updated the assumptions underlying the cost of providing care.⁷

We provide further discussion on the capacity of PSP packages to support Aboriginal children and young people with complex needs in our response to Question 7.

The Audit Office also pointed to variations in permanency planning, casework and support work required according to the complexity of the case, and which resulted from components of work critical to realising Case Plan Goals of restoration. ACCOs are not funded for what is often the extensive time required for work with the Children's Court and preparation of Section 90 applications which undermines efforts for successful family restoration outcomes. It is essential that ACCOs are resourced for the caseworker time required to engage with legal processes and court documentation, and where a child has a case plan goal of restoration that the ACCO can support participation of birth parent/s, and engagement with, family-led decision-making processes.

The PSP Evaluation found that the more extensive casework required for the following three PSP components - essential to the wellbeing of Aboriginal children and young people - is incompatible with current PSP Package structures:

- Family finding and consultation for Aboriginal children in permanency planning (Case plan goal packages)
- Kinship care (Baseline packages), and
- Cultural planning (Specialist packages)⁸

We will discuss the inadequacy of resources that support meaningful cultural planning in our response to Question 5.

⁶ NSW Audit Office, Op cit. pp.50-51.

⁷ Ibid., p.51.

⁸ Rose et.al. Op cit. p.29.

The level of the 'Leaving Care' Specialist Package (\$1,519 pa for three years) is wholly inadequate to supporting Aboriginal young people aged 15 years and older preparing to exit long-term care. Many of these young people will need additional supports to access vocational education and training (VET) and employment opportunities, particularly when time spent in OOHC has disrupted their education or where they need specialist support to build literacy and numeracy skills.

5. How effective is the structure of the PSP and funding for current PSP packages in enabling you to support the cultural, family and community connections for Aboriginal children and young people?

The current PSP structure and funding packages lack transparency in how supporting cultural, family and community connections for Aboriginal children and young people is specified and funded in Case Plan Goal Packages, Baseline Packages for Aboriginal Foster Care and Carer Coordination and the Specialist Cultural Plan Package. It will be critical for IPART to distinguish which resources are allocated to ACCOs to enable fulfilment of the 'Connection' principle within the Aboriginal and Torres Strait Islander Child Placement Principles (ATSICPP) and to operationalise Aboriginal Case Management Policy for Aboriginal children and young people in care.

AbSec is particularly concerned about how Cultural Planning resources are misconceived in the PSP funding structure. Currently, a one-off payment of \$4,164 is paid to support cultural care planning, participation in cultural activities, family finding and genealogy work for new Aboriginal children and young people in care. Our members frequently note the costs associated with limited and/or inaccurate genealogy information provided in case file allocations and ChildStory. There is a subsequent annual payment of \$494 to support the cultural care plan implementation.

For ACCOs, cultural planning is implicit to all parts of providing OOHC to children. The 'one off' payment does not cover building and/or rebuilding connections across extended family and kin structures in a way that honours requirements of Aboriginal and Torres Strait Islander Child Placement Principles (ATSICPP) relating to 'Connection' that are part of the Act. To devote less than \$500 per child per year to support the child's connection to family, culture and community is disrespectful to the purpose of the ATSICPP and fails to acknowledge the resources required so that children and carers can be supported on cultural trips and programs including visiting Country, family members and places of cultural significance. We encourage IPART to examine AbSec *Cultural Connections* training resources developed and delivered by the AbSec Learning and Development Centre (LDC) and the SNAICC *Aboriginal And Torres Strait Islander Child Placement Principle: A Guide To Support Implementation*⁹ to develop more accurate costs for embedding cultural planning work at all parts of an Aboriginal child and young person's experience in OOHC.

As we have discussed in response to Question 3, the Aboriginal Transition Support Payment has not been effective in enabling ACCOs to increase their intake of Aboriginal children in OOHC transitioning from a non-Aboriginal NGO and supporting their family, cultural and community connections.

6. What is good or bad about the current PSP packages in supporting Aboriginal children and young people in out-of-home care? Are there costs that may not be covered?

At a workshop conducted with IPART at AbSec's Quarterly Sector Forum in Tamworth (May 2024), over 50 ACCO staff including representatives of 5 accredited OOHC providers participated in table discussions that identified positive and negative elements of current PSP packages in supporting Aboriginal children and young people in OOHC. Costs that were not covered or were not fully covered were identified and these are set out below. In our response to Question 11 we also log the additional types of costs faced by Aboriginal community-controlled organisations (ACCOs) when providing OOHC compared to non-ACCO PSP providers.

⁹ SNAICC, 2018, *Aboriginal And Torres Strait Islander Child Placement Principle: A Guide To Support Implementation*, December, Practice Focus Area 6 – Connection, pp. 67-72.

Please note that the impact of unfunded and under-funded costs of ACCOs listed have been discussed throughout this submission.

Costs not allocated in PSP funding packages – and (wrongly) assumed to be met through pooling funding
<ul style="list-style-type: none"> • Management and administrative costs • Accreditation and compliance costs • Staff recruitment and training • Costs of intake assessments • Family Finding • Legal costs and Children’s Court work • Work with birth families
Under-funded components of work
<ul style="list-style-type: none"> • Supporting cultural permanency, cultural planning and cultural connection (also see Question 11) • The level of assessed needs is not aligned with cost of the services and support required (see response to Question 4). This is particularly true for: <ul style="list-style-type: none"> ○ Behavioural support plans ○ Allied health services ○ Specialised trauma informed therapies and therapeutic work ○ Supports for children and young people who have experienced Domestic and Family Violence and sexual abuse ○ Work with sibling groups • Coordination across a range of government departments, service types and regulatory authorities • Support for young people leaving care • Support for young people to reconnect with family • Costs of accessing services for ACCOs working in regional and remote communities • Travel and contact time with family, for children and young people whose OOHC placement is not on country. • Working with children and young people who have self-placed

Positive components of current PSP Packages identified at the Sector Forum were:

- Reviews of Case Plan Goals were viewed as a positive process although there are variations across and between Districts in the length of time taken to authorise any changes to case plan goals.
- Having Restoration as the initial albeit time-limited Case Plan Goal when Aboriginal children enter care is seen as a positive, although this objective is somewhat undermined by inadequate resourcing of:
 - Case work to support cultural and relational permanency
 - Children’s Court work, and
 - More intensive work with birth families.

As stipulated across this submission, the negative component of current PSP packages which constrain the capacity of ACCOs to provide quality support and connection for Aboriginal children and young people in care, are a flow-on effect from the ‘average costings’ on which different kinds of PSP packages are based.

These ‘prices’ are not built on a transparent model of the time, costs, services and approach to engagement and service delivery that will best support Aboriginal children and young people with different levels of need. Nor do they integrate resources for cultural work across all package elements.

The funding allocated for Child Needs Packages and the relatively small differences between allocations for children with low versus medium versus high needs is not based on evidence of the type and frequency of services that Aboriginal children and young people will require along a needs spectrum. Recommendations from IPART can inform this key funding challenge.

At present, when an ACCO or NGO applies to have a child’s needs reassessed, there are notable differences in the time taken by different DCJ Districts to consider and approve a reassessment. The Audit Office noted that if a child is reassessed as requiring a higher category of support, DCJ does not back-pay any increased allowances. This is regardless of the time during which the ACCO has provided the child with increased services and means that ACCOs carry the financial burden for the time it takes for re-assessment approval processes.¹⁰

The NSW Procurement Policy Framework includes an objective of ‘easy to do business’. This includes a requirement to pay suppliers within specific timeframes and recommends that government agencies should limit contract length and complexity. An external evaluation of the package-based system found that that the funding packages are complex and administratively burdensome.

7. How does the current PSP package funding impact your ability to deliver care to children with specific needs (including but not limited to children and families with a CALD background or disability)?

In our response to Question 5, AbSec noted the lack of any grounded practice assumptions about the type and frequency of services needed to support Aboriginal children and young people in OOH and how this prevents accurate costing of casework time according to Case Plan Goal and type of Baseline Package, and according to the level of child needs. It is critical that funding models are informed by current and forecast future costs of care across a wide service spectrum spanning health care, dental care, disability care, educational support, training, legal, housing, drug and alcohol, parenting support, domestic and family violence support, childcare, respite care, and any other social and community services.

For Aboriginal children with higher levels of need, the information provided on health and education planning when a child transfers from case management by DCJ is often fragmented or incomplete. There are notable variations between Districts on the level of any coordination between DCJ, the NSW Departments of Education and Health, and the National Disability Insurance Scheme (NDIS). This can lead to significant variations in the demands on caseworker time associated with coordinating information across large government departments and programs.

The size of ACCOs and whether they deliver health, behavioural support, parenting services and disability services through non-PSP funding makes a difference to the amount of time caseworkers must dedicate to provide access to external services for children, young people and carers.

When it comes to specific needs, the PSP evaluation noted that the services which were least able to keep pace with demand were those targeting complex needs and behaviours and specialising in trauma. These specialist psychological interventions included play therapy, specialised trauma informed therapies, interventions addressing inappropriate sexual behaviours and interventions for victims of sexual violence.¹¹ As we briefly discuss in responding to Question 10, access is more limited and wait times longer outside of metropolitan communities. It is important that resources currently allocated to ‘Additional Carer Support’ and ‘Complex

¹⁰ NSW Audit Office, Op cit. p. 50.

¹¹ Rose et.al. Op cit. p.22.

Needs' packages - and the way they are structured within alternative PSP funding models - accurately price services designed to address trauma, violence and sexual abuse to reflect the level of specific needs and safety risks.

8. What are the benefits/drawbacks of the PSP compared to previous funding models?

AbSec does not think this question will provide IPART with useful insights. While PSP introduced a shift from placement-based funding (bed per night payments) to a service-based funding model neither have been built from an evidence-base that accounts for time and resource allocations needed to provide Aboriginal children and young people in OOHC with culturally appropriate services and the connections to family, community, Country and culture that are central to their lifelong wellbeing, identity and sense of belonging. We instead use Question 9 to look at key changes required to the current OOHC funding model.

9. What are the key changes you would like to see made to the out-of-home care funding model?

AbSec argues that an OOHC funding model needs to be developed with and for ACCOs that has the potential to be delivered and administered by ACCOs and community, with a preference for a funding mechanism like Aboriginal-led Commissioning.

We are conscious that the IPART Terms of Reference focus on investigating and reporting on efficient costs; developing benchmark costs for providers supporting children and young people in care across a range of settings and varying levels of need; and to make recommendations on appropriate pricing structures and levels, methodologies for adjusting prices; and the level of the Carer Allowance.

AbSec believes the following key changes to the OOHC funding model will enable IPART to frame and accurately cost differences in levels of need, case complexity and casework requirements; and to consider the additional supports required by Aboriginal children, young people and carers, and the additional costs for ACCOs providing OOHC.

- Develop efficient cost estimates and benchmark costs based on the true costs – including direct, indirect and overhead costs – that ACCOs will incur to provide high quality care that meet the needs of Aboriginal children and young people and supports the recruitment, training and retention of staff who will assist children and young people to build a strong sense of identity and connections to kin, culture and country.
- Create a block funding component that is informed by the cost of management, administrative, financing, compliance, governance and accreditation activities required of providers. Variations in the size of the Block funding component should be informed by cost differences relating to the size of the ACCO, its location, and support the capacity and sustainability of newly accredited ACCOs and ACCOs seeking accreditation.
- Create benchmark costs derived from the time and effort required to support relational and cultural permanency and wellbeing outcomes for Aboriginal children and young people according to their safety needs. The nature of, and time allocated to, cultural work must be accurately priced in the funding structure.
- Have some component of funding tied to the achievement of social and wellbeing outcomes for Aboriginal children and young people to support accountability.
- Re-calibrate child needs packages so that the funds are based on the estimated type and frequency of services that an Aboriginal child or young person would require according to the complexity of their needs. Service cost estimates must include educational support, allied health services, mentoring, counselling, psychology, psychiatry, behavioural therapy and specialist trauma services. There can still be flexibility in how needs-based funding is distributed across children so long as funding levels are aligned to expected support costs.
- Provide a dedicated pool of flexible ACCO funding that can finance service and practice innovation.

- Ensure that funding supports work related to the Children’s Court including completion of legal processes and court documents, and work with birth families, to support families with a case plan goal of restoration.

10. Does your location impact the cost of delivering out-of-home care? If so, what costs are impacted by location?

It will be important for IPART to examine differences in the costs of delivering OOHC services for ACCOs operating in metropolitan versus regional versus remote locations. Key drivers of cost differences include the local availability of services and the distances associated with service delivery. It is important that funding for ACCOs in regional and remote locations factors in the travel time and costs for caseworkers and other support staff to maintain the family, community and cultural connections discussed in our response to Question 5. These are essential for all Aboriginal children and young people in care and are pivotal to realising case plan goals of restoration.

To fund regional and remote providers to meet the *Child Safe Standards for Permanent Care* in domains including Emotional and Social Development, Health, Education, and Behavioural Support it is important to map local social and health service infrastructure at DCJ District and Community Service Centre level. What are the costs of supporting access to the educational support, allied health services, mentoring, counselling, psychology, psychiatry, and behavioural therapy services that can enable ACCOs and carers to best support the needs of each child and young person? What can IPART data analysis discern on geographical differences in service costs, waiting lists? Which types of services for Aboriginal children with complex needs are best provided as face-to-face services and where might tele-health and online service provision enable an appropriate service culture?

11. What are the additional types of costs faced by Aboriginal community-controlled organisations (ACCOs) in providing out-of-home care compared to non-ACCO PSP providers?

At the May 2024 workshop AbSec conducted in partnership with IPART at our Quarterly Sector Forum in Tamworth, over 50 ACCO staff including representatives of 5 accredited OOHC providers participated in table discussions. They identified the following additional types of costs faced by ACCOs providing OOHC compared to non-ACCO PSP providers.

It is important that the IPART review quantifies cost differences so that they are reflected in funding provided to ACCOs relative to non-Aboriginal NGOs. As many of these costs have been discussed in other sections of the submission, we have only provided brief descriptions:

- Higher administration and compliance costs associated with DCJ ‘red tape’ interactions on issues including Carer and Family assessments and intake procedures. These tend to be more complicated when working with extended Aboriginal family, kin and community networks.
- More extensive travel and time spent supporting cultural connections of Aboriginal children and young people with family, kin and Country. This involves additional costs for travel, fuel, accommodation, meals and incidentals and building in longer stays. It also requires funding to support the participation of family members so that costs are not a barrier to building relationships with family and community members, Elders and mentors so they can share knowledge and support children and young people to build their cultural identity.
- Greater and more consistent investment in cultural planning across the child and young person’s time in care. Cultural planning is not conceived as a discrete or ‘one off’ activity when a child first enters care but an implicit component of ACCO ways of working.
- Greater time spent in Family Finding and genealogy work.
- Community accountability means engagement and sponsoring of community events. NGOs and DCJ are constantly seeking cultural advice and knowledge without recognising this as cultural intellectual property or

compensating ACCOs and Aboriginal practitioners for their time. Cultural obligations mean there is no 'off clock' for staff undertaking what is often traumatic and potentially triggering work. Staff burnout rates have financial costs and costs to the relationships built with children and young people.

- The work with children, young people and families is often more complex and intertwined as it flows from intergenerational trauma and family-led decision-making processes including Family Group Conferences take time and require good conflict management skills.
- ACCOs have higher costs in upskilling new staff; creating new entry points and mentoring for Aboriginal people with both system knowledge and lived experience who are completing qualifications; and in training and supervising non-Aboriginal staff to provide culturally safe and appropriate support.
- ACCOs devote more time and resources to advocating for families experiencing systemic justice and violence and carry a significant cultural and committee load providing policy and program advice to DCJ, Office of the Children's Guardian and other entities.