

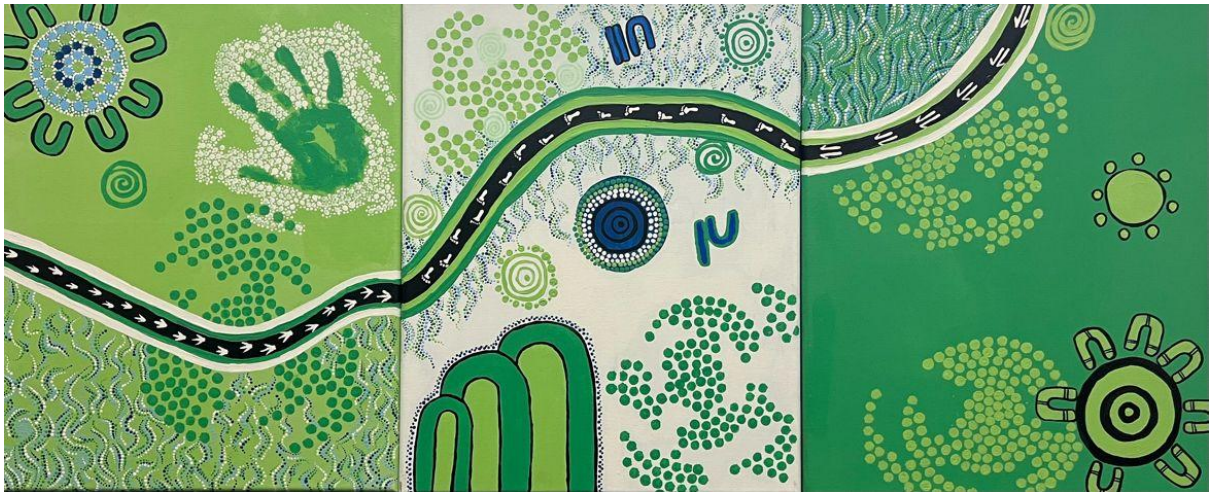


REILLY
FOUNDATION

2022 Review of the Children and Young People (Safety) Act 2017

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Acknowledgement to Country



©Charlie Griffiths (Artist). Charlie is a Barkindji and Buandig artist who has partnered with The Reily Foundation Inc to create a piece of art that symbolises the journey of our Foundation, entitled 'Kumangka' – Coming Together.

The Reily Foundation Inc acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present and emerging.

Summary

The Reily Foundation Inc was formed in 2019 with the aim of helping families navigate the child protection system in South Australia. The focus of the Foundation is to empower parents through support, education and information that builds on their parenting capacity and in doing so this helps them to make more informed child-focused decisions.

The Board and staff of The Reily Foundation are passionate about children growing up in a safe, secure, loving and connected family environment.

In order to reduce the impact of trauma, children who are placed in out-of-home care experience, they need their parents to understand the child protection system, including the system's concerns about their parenting. Having this knowledge enables parents to support their children by engaging in services that build upon parenting capacity and insight. This intervention reduces the traumatic, complex and systemic barriers that make this process difficult for all parties involved. The services of the Foundation help the parents understand the process and which leads to better outcomes for children and families, including reducing mental health challenges and costs incurred by the system.

The Reily Foundation Inc welcomes the discussion paper prepared by The Department for Child Protection and they have provided their responses in this document to be considered as part of the review of the Child & Young People's (Safety) Act 2017.

Guiding Principles of the Act

The Reily Foundation Inc (Reily) supports the five elements of prevention, partnership, placement, participation and connection and further supports the sixth element of inclusion of identification.

It has been Reily's experience that more can be done to include these six elements when working with every family navigating the child protection system. We have identified many examples of when this has occurred well and the outcomes have been positive for the children and when these have not been the focus and put at the forefront of practice, children have suffered.

We need to really understand that children's safety is everyone's business and stop working in silos. Instead work collaboratively with children at the centre to provide the best outcomes for their safety and wellbeing for their entire life.

We trust that the examples and suggestions that we have made throughout this paper will help to provide another perspective on the needs of working with families throughout the whole process which will provide the best outcomes for children. Children continue to voice that their family and remaining connected to their family is important to them. Best outcomes for children can be achieved if the principles as outlined above are upheld and incorporated at all times, when engaging with families.

Question 1

Do you support the Aboriginal and Torres Strait Islander Child Placement Principle being embedded into the legislation to the standard of active efforts?

Active Efforts

Currently, and since the Legislation was amended in 2017, the focus has shifted from actively supporting families with complex generational trauma and the need to a reactive risk-averse practice that has not provided any additional safety or improved the overall wellbeing of our children and young people.

The 1993 Child Protection Legislation understood the need to work with families as it was outlined to recognise the importance of families to children and promote caring attitudes and responses towards children among families and all sections of the community so that the need for appropriate nurture, care and protection (including protection of the child's cultural identity) is understood, risks to a child's wellbeing are quickly identified, and any necessary support, protection or care is promptly provided (SA Government, 1993). However, the importance of families is not referred to beyond maintaining connection and contact in the replacement Legislation.

The number of children that are entering care and remaining in care is increasing each year and as a State, we need to identify new ways of protecting and supporting our children and young people to stop the complex generational trauma and help them to achieve safety and wellbeing so that they can go on to live full and healthy lives.

In the United States, a similar pattern has evolved with Indian children and the overrepresentation of them and their families in the child protection system. The National Indian Child Welfare Association (NICWA) outlined that active efforts may include:

- Conducting a strengths-based assessment that takes into account a child's cultural needs;
- Enabling child and family participation in case planning (Family Group Conferencing included);
- The provision of early intervention supports to families prior to removing a child;
- Providing reunification support to families

Active efforts are purposeful, thorough and timely efforts, supported by legislation and policy, that enable the safety and wellbeing of Aboriginal and Torres Strait Islander children (SNAICC, 2019).

Reily welcomes this practice being embedded into our Legislation and supports a shift from the current practice to one that provides every effort for a family to make sustainable change and ultimately supports the best interest of the children.

Aboriginal and Torres Strait Islander (ATSI) Child Placement Principle

Reily supports the Aboriginal and Torres Strait Islander Child Placement Principle being embedded in the Legislation to the standard of active efforts. We also extend that 'active efforts' should be applied to all children and their families navigating the child protection system. The Foundation acknowledges the historical and generational damage and trauma that the South Australian Child Protection System has caused to our First Nation people.

It is our experience at Reily that a significant number of Aboriginal and Torres Strait Islander and in fact many of the parents working with our Foundation, did not understand the child protection concerns prior to the removal of their children and were not linked to culturally-informed services to support them to address the child protection concerns.

Case Study 1

Mother who was 6 months pregnant was not linked with any services to support her to address the child protection concerns. The main concern was prior child protection history. Mother had the understanding that the baby would not be removed at birth as DCP workers had engaged in visiting the house and complimenting the state of the house and room for the infant. The baby was removed at birth and the Department applied for an 18-year order. In court, the order was negotiated to a 9-month reunification order. Reily Foundation supported the parent to engage with services that supported her in addressing child protection concerns. There was no referral to Family Preservation or Family Group Conferencing prior to removal. Baby is now being transitioned back into the care of the biological mum after 11 months in out-of-home care.

Case Study 2

First-time Aboriginal mum had a baby removed from the hospital with no knowledge of child protection concerns and was not linked with any early intervention support. Family Group Conferencing was not provided as an option. Mum, baby and grandmother are now residing after 7 months in the maternal grandmother's house.

If the principles of active efforts were applied to these two examples it may have resulted in the child residing in the care of their biological family and necessary supports wrapping around them to ensure that the best interest of the child were supported including safety as well as the overall wellbeing of skin to skin, breastfeeding and secure attachment.

Question 2

Looking at the different examples, what changes can we make throughout the Legislation to demonstrate the commitment to active efforts?

Implementing Active Efforts into our Legislation

Active efforts as outlined above highlights the need to engage with a family as early as possible to identify the possibility of a family coming together to create a plan with the child's community/village to make decisions for the safety and wellbeing.

Our Foundation has engaged with 107 clients during the 2022 calendar period with only 3 families being asked to engage in a family group conference. This highlights a gap in applying a tool that has provided very positive results in keeping children safe. Relationships Australia have provided data that have highlighted that of the 188 family group conferences that they have held 95% have reached agreements and 92% resulted in children staying safe with their biological families.

The Reily Foundation is supportive of all families being referred to a family group conference conducted similar to the format and procedure that exist in Ngartuitya Family Group Conference Service prior to the removal of children. Children who are removed have generally had multiple reports made regarding the safety and wellbeing which provides significant opportunity to engage a family group conference service to bring together the family, friends and supports of children to make a plan to keep them safe and supported. The currently legislation and the 1993 Child Protection Legislation also provided provision for family group conferences but they continue to be under utilised and the language needs to be stronger in the legislation to encourage them to be used more frequently and as a first point of call.

Question 3:

Should the legislation require that all government agencies make active efforts to support Aboriginal children and young people?

Removal of children should always continue to be a last resort and if all government agencies were applying active efforts to remove barriers that bring children into unsafe situations or environments the number of children experiencing cumulative trauma would reduce.

Parents that engage with our Foundation have the following child protection concerns listed in their case plan, substance abuse, mental health, growing up in care, financial instability, homeless and domestic violence as a common theme.

The long waiting lists for accessing mental health and substance abuse counselling have contributed to the cumulative trauma that their children have experienced and the need for active efforts to assist these families to make the changes they need and address the concerns that are causing harm to their children. The lack of affordable housing and government housing has also left little options for parents to remain in unsafe environments with their children.

Question 4:

Should the legislation include the model of active efforts for all children and young people engaged with child protection?

Reily supports the legislative requirement that all government agencies need to make active efforts to support Aboriginal and Torres Strait Islander children and young people and that this also be extended to all children in the child protection system.

The clients that have engaged with Reily have reported qualitative data that demonstrate a common theme that at the time of removal they did not understand the child protection concerns. Further, a large number of Reily clients reported that there were no services involved prior to the removal, this has been especially evident with respect to families with unborn babies. As highlighted above there was also a common theme of family group conferences not being part of their family process

Questions 5, 6, 7, 8, 9 and 10

The number of ATSI children entering out-of-home care has increased significantly since the implementation of this Legislation. Currently, there are 1 in 11 Aboriginal children entering out-of-home care and 37.5% of children in care are Aboriginal. The Reily Foundation supports that Aboriginal Family-Led Decision Making as well as the general concept of Family Led Decision making be a critical element of improved child protection decision-making and supporting the child's best interest.

Question 11

Do we have the right principles in place to guide decision making in South Australia's child protection legislation

The Reily Foundation has identified a common theme throughout the legislation that provides too much responsibility on the Chief Executive to consider assessment tools with no accountability or transparency required if they choose not to explore family-led decision-making or with respect to working collaboratively with families.

This lack of family-led decision-making with a child focus lens has resulted in more children entering care and remaining in care and fewer children successfully reunifying back to their biological families.

Name Change

The Reily Foundation is calling for a change to the legislation from Child & Young Peoples (Safety) Act to Children, Young Persons and Family (Safety and Support) Act 2022 (SA) to ensure we are incorporating families into the decisions that are being made.

Sections of the Legislation to be Reviewed

10. Principles of intervention

1(a) decisions and actions (if any) under the Act should be taken in a timely manner (and, in particular, should be made as early as possible in the case of young children in order to promote permanency and stability).

This section of the legislation has led to unrealistic time frames of 3-6 months to engage with the case plan and address child protection concerns. In 2021 in an assessment of 32 clients who were engaged with Reily Foundation support, whose files were closed, 28 of these clients moved from an investigation/assessment order to their children being placed on long-term orders and 4 of these families had their children reunified into their care.

In 2022 of the 14 cases that have been closed, 6 of these went from investigation/assessment orders to 18-year orders and 8 of these cases had their children reunified into their care. Parents who engaged in this support also attended our Showing up for your Kids Workshop © and engaged in one on one therapeutic support to understand and engage collaboratively in addressing child protection concerns.

21. Family Group Conferences

Family Group Conferences are a unique tool that originated in New Zealand and are used throughout Australia effectively. South Australia has not utilised this tool to its full capacity even though the data since Relationships Australia has operated the Ngartuitya Family Group Conference under a pilot program demonstrates a direct correlation in keeping children out of care.

Since 2020 there have been a total of 188 conferences held where 95% have reached an agreement and 92% of children have remained safe in their families. There were 369 children involved in this pilot and what it demonstrated was that there were at least 2 family members per child that were available and willing to participate in the process of creating a plan to keep these children safe.

The Reily Foundation in 2022 engaged via our Showing up for your Kids workshop © and our one-on-one therapeutic support with 80 clients. The Reily Foundation has been part of 2 Ngartuitya Family Group Conferences in 2022. The qualitative data that has been received by The Reily Foundation is that the majority of clients did not know what a Family Group Conference was and was not asked by the Department for Child Protection if they wanted to explore this as an option.

The Reily Foundation Inc is calling for a Family Group Conference, preferably Ngartuitya is utilised as soon as a child(ren) has been highlighted at risk of removal and prior to a court order being applied. The language of “the Chief Executive or the eCourt (as the case requires) MAY convene” is not strong enough and has led to this important tool being overlooked rather than identified as a key tool in reducing the number of children coming into care.

57 Court not bound by rules of evidence

58 Standard of proof

59 Onus on objector to provide order should not be made

Article 7 of the United Nations Universal Declaration of Human Rights “all are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination”.

Article 10 Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Parents who come into contact with the child protection system do not have the financial means to present an adequate defence to an order that is applied for in the court, especially when the onus is on the parent to provide that they are not a risk to their children. Legal aid is not sufficient and it is also not always provided to parents to enable them to be adequately represented, this results in orders being signed under duress and without understanding the impact that signing this order presents.

The Reily Foundation Inc is calling for a review of legal aid to ensure that all parents have adequate legal representation to contest these orders but at a minimum an understanding of the implications of signing an order.

94 - Contract Arrangements Review Panel

The Reily Foundation Inc acknowledges that the Contact Arrangements Review Panel is in line with the recommendations from Commissioner Nyland in the Report ‘The Life They Deserve’. Since inception qualitative data obtained from Reily Foundation has determined that parents found a lack of (a) clarity of and (b) meaningful involvement in the contact arrangement process and CARP specifically, which led to a lack of representation and resulted in parent disengagement and poorer outcomes for child connection. This situation works against the key DCP practice principles of preventing children from entering care and engaging families in the process (The DCP Practice Principles).

The Reily Foundation Inc is requesting that the Contact Arrangement Review Panel sit outside the agency of the Department for Child Protection and is made up of all panel members who are not employees of DCP. The panel should also be an opportunity for parents, DCP, carers and children to have their views heard regarding what is in the best interest of the child with respect to contact with the biological family.

Currently, parents have provided feedback to our Foundation that their only engagement with CARL was to inform the panel that they were disputing the contact that was specified in the contact determination letter and received no further engagement until they received the determination letter. Our data also states of the 80 clients that Reily engaged within 2022 only 1 parent had a decision that was determined by the panel in their favour, the other 79 resulted in the panel upholding DCP the decision or deciding to reduce contact further.

Decisions that are made in respect to contact can have an effect on the possibility of reunification but also the possibility of strengthened connection with biological families. Where decisions are made to remove contact or reduce contact, active efforts need to be made to help parents to understand the concerns that are occurring in contact for their children to enable them an opportunity to learn and build on their parenting capacity. Ideally this should be provided by an external agency such as The Reily Foundation or other non government trauma informed organisations to give an opportunity for parents to engage in the process openly and receive unbiased feedback and support.

Our workshops and one on one therapeutic counselling have enabled us to provide information and education to parents which they have been able to implement in contact producing good outcomes for children and their parents moving forward.

Part 2 - Review of decisions by the South Australian Civil Administrative Tribunal

The Reily Foundation is calling for the expansion of the SACAT power to ensure that all decisions that are made by DCP can be reviewed by either SACAT or the courts. It is disempowering and unethical that a government agency's decisions are final within that agency with no further scope for review by an external agency when all interview review forums are exhausted.

Article 7 of the United Nations Universal Declaration of Human Rights “all are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination”.

Article 8 of the United Nations Universal Declaration of Human Rights is that “Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law”.

Parents throughout this process are not afforded this equal protection as the CARP Panel has the power to make decisions as per the court that are final and non-reviewable. However, the biological family does not have the right to have their views represented in the decisions that the parents make as they rely solely on the documents provided to them by DCP which is the same agency that also operates CARP.

Question 12

In additional to safety as the paramount consideration, should the legislation be explicitly that the best interests of the child is a matter to be considered in decision-making

The Reily Foundation Inc supports the United Nations Convention on the Rights of the Child best interest principle to be embedded into the legislation as the paramount consideration.

1. In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration.

2. States Parties undertake to ensure the child such protection and care as is necessary for his or her well-being, taking into account the rights and duties of his or her parents, legal guardians, or other individuals legally responsible for him or her, and, to this end, shall take all appropriate legislative and administrative measures.

3. States Parties shall ensure that the institutions, services and facilities responsible for the care or protection of children shall conform with the standards established by competent authorities, particularly in the areas of safety, health, in the number and suitability of their staff, as well as competent supervision.

We support that safety is absolutely a necessity when considering the wellbeing of a child but can not be considered in isolation from other important factors that will have an impact on a child over their lifetime Article 8 which promotes the need for the State to “respect the right of the child to preserve his or her identity, including nationality, name and family relations as recognised by law without unlawful interference. There are many aspects of the best interest principle that need to be referred to in practice to ensure that children and young people live a full and contributing life. Only focusing on the safety of children and young people at a particular point in time is not adequate to consider what these citizens will need for the whole of their life journey.

Question 13

Do you support changes to the legislation to make it clear the Aboriginal and Torres Strait Islander Child Placement Principle is the paramount consideration – aside from safety - in all decision-making involving Aboriginal children and young people?

The Reily Foundation does support the changes to the legislation making the Aboriginal and Torres Strait Islander Child Placement Principle as the paramount consideration aside from the safety and best interest of the child.

Question 14

Should a public health approach be taken to child protection, and if so, how can the legislation support this?

Mental Health and substance abuse counselling continue to be the main causes outside of domestic violence, of children being removed from their parents' care. The Department for Child Protection can not be responsible to reduce the number of children entering and remaining in care if the services that are required to support these families are under funded and have extraordinarily long waiting lists. Parents that have engaged with our Foundation have reported that it can take up to 3 months to enter counselling and close to 6 months to enter a rehabilitation facility. When parents have 3-6 months to actively and genuinely engage with their case plans to address the child protection concerns in line with “timely decisions” that need to be made by DCP caseworkers, we are setting both the family and the Department up for failure.

This needs to be a public health approach and a responsibility for the child’s community to be doing more to actively support these children.

Question 16

Should the legislation set out the roles and responsibilities of relevant government and non-government agencies for children’s safety?

Since 2019 The Reily Foundation has worked with families that have had their children removed. We have identified some key themes that give support to the statement that the Australian Government coined in the National Framework for protecting Australia’s children that ‘protecting children is everyone’s business. Families that have had their children removed have financial insecurity, poor education, poor employment history, lack of affordable housing, homeless, experiencing domestic violence, experiencing mental health and experiencing substance abuse. They have also experienced child protection removal as children. There are multiple government agencies that are involved in the disempowerment that these families have experienced. The additional barrier they face when their children are removed is that they are unable to address child protection concerns due to the lack of resources provided to them.

Article 25

1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.

Parents that are navigating child protection have come under the lens of this system in part due to the failure of our Government to provide adequate access to basic human rights as listed above and highlighted in the United Nations Universal Declaration of Human Rights.

Parents navigating the child protection system have between 3 to 6 months under the investigation orders to engage with services that will enable them to address the child protection system. However when waiting lists for mental health, housing, substance abuse rehabilitation and domestic violence support can exceed 10 weeks except for housing which can take years this adds additional barriers to achieving reunification that is outside the parent's control.

If children navigating the child protection system were under the guardianship of the premier who is in charge of all of these services then it would be the responsibility of the Premier to ensure that a solution for these children and their families would not be the responsibility of the child protection minister who is not in control of health, housing, women, families and Aboriginal and cultural affairs. It would be the Premier's responsibility to bring all of the Ministers together to create a solution to the barriers that are disempowering these families to make generational changes.

Question 17

Should the legislation explicitly require the government to fund therapeutic interventions targeted to support families whose children have been identified as at risk of harm or abuse?

Embedding active efforts into the legislation would ensure that the government, prior to the removal of children, were able to identify every ACTIVE effort that was made to engage families in therapeutic interventions. This would also ensure accountability if active efforts were not implemented and the steps that the government would need to take to ensure that this is rectified to support families to engage in targeted therapeutic interventions.

Question 18

Does South Australia have the legal threshold right for child protection?

Nyland highlighted that child protection was everyone's business which resulted in mandatory reporting and consequences of not meeting requirements as a mandatory reporter. The Reily Foundation supports the responsibility of keeping children safe in the South Australian community to everyone and not just the responsibility of the Department for Child Protection.

Question 19

Would you support changes to the threshold that enables the Department for Child Protection to focus on children and young people at imminent risk of significant harm?

Provided that another government body was responsible for children and their families being supported through targeted therapeutic intervention then Reily would support DCP focusing on children and young people at imminent risk of significant harm.

Question 20

Should there be any changes or exemptions to the existing mandatory reporting requirements? How else could mandatory reporters discharge their obligations?

The Reily Foundation does not support discharging mandatory reporters obligations as keeping children safe is everyone's business and that should be the focus not how the community can absolve themselves of their mandatory responsibility. Providing more educational opportunities for mandatory reporting to identify what needs to be reported and what needs to be supported might assist in reducing the number of unsubstantiated reports that are not screened in.

Question 22

Should the legislation be clear that children and young people are at the centre of everything we do?

The legislation is clear that children and young people are at the centre, however, the interpretation is that their biological families are not part of this process which is where the legislation and interpretation have fallen short.

Being child focused includes all elements of their village including their immediate families, extended families, school community, leisure activities and clubs and this is not provided with enough consideration when children need to be removed.

Question 23

How can the legislation better support children of all ages to express their views and wishes, and uphold their right to participate in important decision-making processes that affect them?

Children require an independent advocate that ensures that their voice is heard throughout the process. Children's lawyers support this process whilst they navigate the court process but with respect to their voice being heard outside of DCP case workers or their parents, their voice becomes lost and conflicted between loyalties.

All children navigating out-of-home care should have an independent advocate from the Guardian for Children and Young People allocated to them to ensure that when things change their voice is not lost.

Children that have exited care and have engaged with our Foundation have advised that they felt that their voice was lost and they were not kept informed as to what was happening. They have expressed that things were not explained and they were informed of how they needed to behave or contact with their parents would cease. They clearly articulated that the pull of their family was always strong and this was discounted whilst growing up under the care of DCP.

Reily Foundation welcomes the direct consultation that will occur between the Guardian for Children and Young People and CREATE who are the lead bodies of bringing these voices of children to the forefront and what these children and young people need.

Question 25

Are there parts of the legislation that could be changed to improve the timeliness of child protection decision-making and support better outcomes for children and young people?

Nyland highlighted the importance of timely decisions to ensure that children were not waiting on orders for years with no possible way of returning to their biological family or finding stable alternative care.

Reily Foundation agrees with decisions being made in a timely manner. DCP practice already engages in the investigation and assessment phase within the first 3 to 6 months, so even though the 10-week investigation and assessment orders are not embedded into the legislation they are already occurring.

In order for parents to be able to engage holistically with the process they need the support and tools to be able to do so. The Reily Foundation has qualitative and quantitative data that when you provide this support to parents they are able to make informed child-focused decisions that result in better outcomes. They are able to understand and engage with their case plan and link with services that will enable them to address child protection concerns. They are able to engage in contact in a child-focused manner to ensure that their conversations with their children and their engagement are not causing further trauma. They are able to engage with their DCP case worker and other services in a collaborative way without becoming defensive and halting the process of working towards their children returning home. The only way we reduce the number of children navigating long-term out-of-home care, is we empower their parents with therapeutic tools and support that empowers them to make informed and child-focused decisions.

The Reily Foundation recognises our unique position that enables parents to access independent support and advice that does not present a conflict to the parents or DCP. The ability for parents to feel that they have the correct unbiased information to enable them to make informed decisions has changed their interaction with both DCP and their children and our data recognises the ability for significant long term changes to be made that are in their children's best interest.

Question 26

Could the CYPS Act be strengthened to enable all young people in care, and leaving care, to access the services they need to heal from trauma, to grow up healthy and strong, and to be supported as they transition into independence?

CREATE and The Guardian for Children and Young People would be better placed to answer these questions but the Reily Foundation's position is that all children in out-of-home care need an independent advocate outside of DCP to ensure their voice is heard, to ensure that they have their mental health and trauma needs met by engaging in therapeutic support. To ensure that their education, health and social supports are providing every opportunity for them to engage and support better outcomes for their entire life not only focusing on their safety.

Question 27

Can changes be made to the legislation which helps us to further bring to life the "Statement of Commitment"

The Reily Foundation values the role and importance of carers in supporting children and young people navigating the child protection system and we support the Statement of Commitment being embedded into legislation.

Question 29

Should a reunification approach be provided for in the CYPs Act Legislative framework?

The Productivity Commission reported that 78% of the total child protection budget is spent on care services which are 30.6% higher than the national average. We are also spending 29.8% lower than the national average in terms of spending on intensive family support. It is widely reported that we are risk-averse and reunification rates are very low due to the concerns and fear that DCP caseworkers hold with respect to returning children to biological families.

Every child and family situation is different and reunification is not possible for some families which can be identified within the investigation period, however, for the majority at least 12 months of intensive therapeutic support and education needs to be provided to a family to establish the viability of reunification.

It is the Reily Foundation's position that the Department's interpretation of timely manner needs to be adjusted rather than the legislation needing to change. However, the introduction of active efforts will ensure that caseworkers are doing everything possible to engage parents in the process of addressing child protection concerns and the genuine possibility of reunification.

Our qualitative and quantitative data is that when you engage with parents and provide them with the tools and therapeutic support to address child protection concerns and help them to understand and support their children's trauma they have the ability to make informed child-focused decisions.

The Reily Foundation Inc has held a unique position of sitting outside of DCP and other NGO's and providing clear, concise and supportive tools and information that have helped parents to identify what they need to do, and how to do it and it is producing positive outcomes in engagement and addressing concerns but they need realistic timeframes and the availability of support services to be successful. We need to remove the barriers not make it more difficult and effectively set them up for failure and a life that their children will continue to navigate out of home care.

The Reily Foundation Inc has appreciated the opportunity of engaging in this process and we look forward to the continued engagement of all key government and non-government stakeholders as children's safety is everyone's business.