

Response to the NSW Office of the Children's Guardian

Review of accreditation & monitoring functions

Consultation Paper

November 2021



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Subject	Consultation Paper for the Review of Accreditation and Monitoring Functions
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Introduction

Barnardos Australia (Barnardos) welcomes the opportunity to respond to the consultation paper released by the NSW Office of the Children's Guardian (OCG) in November 2021.

It is noted that the purpose of the paper is to facilitate discussion on the efficacy of the current accreditation scheme and opportunities to improve, noting the complex regulatory landscape and significant reforms and reviews that have occurred since the introduction of the NSW accreditation scheme for statutory out of home care (OOHC) providers. The consultation paper notes the changes include the:

- Royal Commission into Institutional Responses to Child Sexual Abuse transition of statutory OOHC service delivery to the non-government sector
- Family is Culture Report (independent review of the experiences of Aboriginal children and young people in NSW statutory OOHC)
- anticipated commencement of the Residential Care Workers Register
- transfer of WWCC and reportable conduct functions to the OCG
- Permanency Support Program and DCJ Commissioning Framework
- implementation of the Intensive Therapeutic Care System
- Safe Home for Life reforms, and
- commence of the National Disability Insurance Scheme (NDIS).

Barnardos is a long-standing major Australian provider of OOHC and adoption services, including in NSW, where child placement programs have been provided for 100+ years and as an accredited adoption from foster care since 1986. In August 2021, the OCG re-accredited Barnardos as a designated agency and adoption service provider for a period of five years, until August 2026, noting that Barnardos was previously the first NSW dually accredited organisation. Barnardos is the only designated agency with Delegated Parental Responsibility, by way of executed Deed with the NSW Department of Communities and Justice (DCJ). The Deed authorises the agency with aspects of parental responsibility for non-Aboriginal children placed in sole parental responsibility of the Minister, following a final order made under the *Children and Young Persons (Care and Protection) Act 1998* (Care Act).

Commitment to collaborative design with designated agencies

Barnardos is committed to maintaining legislative and practice-based quality standards and welcomes external oversight of its service delivery, especially when it contributes to continuous

improvement. Barnardos supports the OCG's oversight of accreditation and monitoring of NSW OOHC and adoption providers which contributes to maintaining quality assurance and benchmarks standards for the entire sector and welcomes the OCG's review of its policies and procedures.

However, the increasing "compliance culture", which has been driven by the layering of significant reforms and reviews, is incredibly concerning and we have witnessed system drift away from a focus on continuous improvement, best practice, and outcomes for children.

In opening our response, we feel it is critical to identify the significant and ongoing issues that the impact of the highlighted reforms have had on accredited agencies and that this review provides a welcome opportunity to co-design an accreditation and monitoring system which has at its heart the safety, wellbeing and permanency of vulnerable children and young people and importantly the safety and wellbeing of frontline practitioners.

A modern accreditation and monitoring system must have as its core the practice (and evidence) influencing child outcomes, including timely achievement of permanency. This is Barnardos area of expertise across the continuum of preservation, restoration, guardianship, and open adoption. While child safety is a fundamental tenant, child protection systems are so much more than that.

Barnardos overall concerns and queries regarding the present proposals are as follows:

- The proposals will continue to be overly focused on meeting the administrative and compliance oversight of the OCG resulting in agencies experiencing more frequent and 'more of the same' monitoring, with less time to focus on implementing quality improvement plans. Information regarding the OCG's proposed cycle of monitoring appears quite complex and similar to the 5-year cycle visits, with opportunity for further additions to the visits at the discretion of the OCG.
- Barnardos is concerned that increased OCG oversight will require the agency to divert or allocate additional, limited resources, time and funding to enable ongoing responses to increased monitoring frequency.
- It is not clear why the OCG appears to be recommending quality improvement planning, while adding further compliance requirements to its schedule of proposed visits. Agencies already have existing internal Quality Improvement Plans, reflecting their strategic plan

and practice frameworks and are already committed to continually review and improve all areas of service delivery. The OCG does not refer to how these existing plans may be viewed in light of the proposals.

- It is not clear how the OCG will prioritise its functions according to perceived need or gaps, as the proposal implies. Barnardos questions whether this is the role of the OCG.
- Barnardos is very concerned the proposals will add further pressure and burden to the existing accreditation and monitoring burdens for the sector.

Barnardos believes that the release of this consultation paper is a good first step. We acknowledge and concur with the OCG's outline of the complex challenges facing the sector, which have been further exacerbated by the COVID 19 pandemic and although we appreciate the opportunity to comment on the proposals, more time should have been provided to allow for deep consultation.

A commitment is required by the OCG to continue to work with designated agencies to design the future accreditation and monitoring system. This is critical considering Barnardos does not support a significant number of the recommendations, and our position is supported by many other agencies.

We look forward to advice from the OCG about how we can come together to work collaboratively to complete the design process.

Barnardos response to OCG proposals

Accreditation of designated agencies and adoption service providers

Key proposals

1. Applications for accreditation as a designated agency may be made by a Government Service agency or a charitable or not-for-profit organisation. This provision would only apply to new providers seeking provisional accreditation. Existing for-profit providers currently delivering services to children and young people in statutory out-of-home care would be eligible to apply for a renewal of accreditation.

Barnardos does not support this proposal.

2. Retain the existing provisions regarding applications for accreditation as an accredited adoption provider.

Barnardos does not support this proposal.

Questions

- Should accreditation to provide statutory OOHC services be limited to Government Sector agencies and charitable or not-for-profit organisations?

Barnardos supports the proposal that OOHC and adoption services should only be delivered by Government, charities, and not-for profit organisations. There is an inherent conflict of interest associated with for-profit providers financial interests and decision making and service delivery being financially driven as opposed to child-focused outcomes and what is in the best interests of the child.

- Are there benefits in having a mix of for-profit and charitable or not-for-profit providers in the statutory OOHC system?

Barnardos does not consider there are any benefits to having a combination of for-profits and not-for profit providers. This will most likely lead to the OCG introducing further compliance and monitoring accountabilities to address profit incentivised organisations which in turn, may place an additional, unnecessary compliance burden on the not-for-profit sector.

Further, the OCG should extend their legislative change to ensure that current for-profit organisation cannot renew their accreditation and continue to provide OOHC services.

Applications for accreditation as a designated agency

Key proposals

3. Applications must be made in a form approved by the Children's Guardian.

Barnardos supports this proposal.

4. Applications for accreditation are no longer required to include a behaviour management and support policy.

Barnardos does not support this proposal.

5. Remove provisions regarding an agency taking on the application for accreditation of another agency.

Barnardos supports this proposal.

Questions

- Do you agree that an application for accreditation should set out how the agency intends to meet the particular needs of Aboriginal children and young people?

Barnardos supports the proposal that agencies will be required to provide a policy statement on how it will meet the needs of Aboriginal children and young people and implement the Aboriginal and Torres Strait Islander Child Placement Principles (ATSICPP), inclusive of the provision of a practice framework reflecting the Aboriginal Case Management Policy (ACMP).

- What things should an agency applying for accreditation consider when reflecting on its capacity to provide culturally safe care?

The NSW Government must urgently develop a strategy and transition plan to grow the Aboriginal Community Controlled Sector so that more Aboriginal children, young people and their families can be supported by Aboriginal Community Controlled Organisations (ACCO) with an emphasis on prevention and early intervention. This strategy must be co-designed with Aboriginal people, ACCOs and communities and include a clear vision, targets and strong monitoring and reporting on Government's performance. It must also be adequately resourced, incorporating implementation requirements and the role of ACCO's in supporting their local communities.

Culturally informed and safe care can only be delivered when agencies are provided with sufficient resources to enable quality assured organisational support and guidance for

*ongoing caseworker training and development regarding the ATSCPP and ACMP.
While the above strategy is developed and implementation occurs, non-ACCOs require additional resources and supports.*

Experience and Qualifications of principal officers and structure of governing bodies

Key proposals

6. An agency must be able to demonstrate that the principal officer has relevant qualifications or experience in delivering services to children and young people, noting that an agency may await the outcome of its application for accreditation before appointing a principal officer.

Barnardos supports this proposal.

7. An applicant for accreditation must be able to demonstrate that it has a governing body with at least four members who are independent of the organisation (that is, not engaged by the agency as an employee, a volunteer or an authorised carer), before the Children's Guardian will consider its application for accreditation.

Barnardos supports this proposal.

Questions

- Do you agree that the principal officer for an agency must have relevant skills and experience in working with children and young people?

Barnardos supports the proposal as the present legislation does not stipulate any requirements pertaining to a principal officer's qualifications and experience.

- What skills and experience do you believe are most relevant for the principal officer role?

The principal officer must possess relevant skills and experience in delivering services to children and young people and have the relevant tertiary qualifications or equivalent to do so. Capabilities are also inclusive of leadership and management, financial literacy, program design, strategy, research and advocacy. Barnardos recognises the challenges

in becoming too prescriptive and is keen to understand what challenges, if any, the OCG has experienced with principal officer capabilities.

- Do you agree that having an appropriate governance structure in place should be a prerequisite to apply for accreditation?

Barnardos supports the proposal that a governing framework, inclusive of a governing body, should be in place prior to accreditation. The governing framework is critical for setting and overseeing the agency's governance, strategy, culture, finance and audit, and that there are systems in place to ensure best practice service delivery. A governance framework should include a board, sub-committees (where relevant) and have clear engagement mechanisms with the CEO and Executive Leadership Team.

Accreditation of new providers

Key proposals

8. As part of fulfilling responsibilities to accredit designated agencies or adoption service providers within the available resources of the OCG, the Children's Guardian may prioritise applications for accreditation.

Barnardos supports this proposal in principle.

9. In the exercise of the Children's Guardian's discretion, the Guardian may prioritise applications from Aboriginal Community Controlled Organisations, organisations specialising in services where there may be a gap in the system, such as mental health or disability services, or organisations operating in geographical areas where there is a shortage of services. Applications from other providers would be considered after priority applications have been assessed. The OCG will make the basis for determination of priority groups publicly available.

Barnardos supports this proposal in principle.

10. An agency that has had its accreditation shortened or cancelled may not re-apply for accreditation for two years, even if constituted as a new entity within the two-year period.

Barnardos supports this proposal in principle.

Questions

- Do you agree that the Children's Guardian should exercise discretion in prioritising applications for accreditation?

Barnardos supports the prioritisation of applications which address gaps and unmet needs in the sector, however Barnardos require further information on the criteria the OCG will apply to exercise its discretion. These areas should be clearly outlined and transparent to the sector.

- Do you agree with the proposed priority groups at (1.5, 9) above? Are there other organisations that should be prioritised?

Barnardos agrees that prioritising accreditation of ACCOs is essential. However, there is a missing step in the solution.

The Department and OCG should be working collaboratively with existing accredited agencies to address service gaps, as opposed to introducing new providers into an already crowded service system.

- Do you agree that a designated agency or an adoption service provider that has had its accreditation shortened or cancelled should be prohibited from applying for accreditation for a period of time?

Barnardos position is that no agency should remain operational if they are not meeting sufficient standards of service delivery within a 12-month period.

Accrediting models of statutory OOHC

Questions

- Do you agree with the proposal to accredit an agency to provide statutory OOHC, rather than specifying whether the agency can provide foster care, residential care or both?

Barnardos does not support this proposal. There are inherent and fundamental differences in providing home-based care and residential care. There should not be an assumption that because organisations are accredited to deliver one type that they can competently deliver the other. Foster care and residential care are discrete child placement types with research proven differential life outcomes for children.

- Would this approach provide greater flexibility for the way your organisation delivers services?

No. The issue at hand is better alignment of the home-based and residential care systems. Further work is required by agencies working with the Department to address the barriers and challenges that are preventing a small number of very complex adolescents from timely placement into Intensive Residential Care and the children and young people entering Alternative Care Arrangements. Further, it must be recognised that these cohorts of young people are very small compared to the number of children and young people in home-based care and therefore shouldn't drive whole-sale system wide changes.

- Are there any risks or challenges in providing agencies greater flexibility in how they deliver services?

The proposed change assumes residential care and foster care have similar programs and transferable expertise. Although there are similarities, the risks associated with delivering a different service include the following:

- *A foster care agency may lack expertise, resources and facilities to provide high quality specialised, therapeutic residential service. There is inherent risk in a foster care agency adapting its core function of delivering home based care to providing a robust model of residential care. For example, residential care requires oversight of a different staff/carer cohort and has additional compliance obligations.*
- *There will be an increased reliance by foster care providers to use residential care solutions for home-based care disruptions. Residential placements are at risk of becoming long term solutions to short term placement challenges. This is particularly concerning for Aboriginal children and young people who are already over-represented and places agencies at risk of repeating past mistakes.*

- *Agencies are already experiencing significant challenges with obtaining appropriate insurance coverage. This change has the potential to exacerbate the problem with unqualified and inexperienced agencies delivering sub-par residential care and witnessing a rise in reportable conduct allegations, workers compensation claims, legal claims and correspondingly further impacting insurance availability.*

Accrediting adoption providers

Barnardos supports the proposal that “the OCG should retain the current distinctions between accreditation to provide domestic adoption services and accreditations to provide intercountry adoptions services”.

An alternative accreditation process for the short-term emergency care providers.

Questions

- What are your views on creating a new class of accreditation for providers that provide short term emergency care?

Barnardos does not support this proposal. Firstly, this proposal is a direct contradiction with the proposal regarding home-based care and residential care.

Short-term emergency care is a sub-set of home-based care. Barnardos does not support any of the proposals to accredit a new class of agencies to support short term care emergency care only.

- Do you agree that providers accredited to provide emergency care only, should have limits placed on the type of services they can provide?

Barnardos does not support this proposal.

- Do you agree that case management and decision making about the child’s care should remain with a fully accredited agency?

Barnardos supports the intention of this proposal.

- What risks or challenges do you foresee with the proposed model?

By creating a new accreditation system for short-term emergency care this will further segment the service system and cause children to become “bed-blocked” as agencies seek to move children from one part of the service system to another. Further, short-term emergency care, as envisaged in this consultation paper, will become the primary (and only) means to address “hard-to-place” children and placement disruptions. Children will be at risk of multiple short term placement solutions instead of addressing their permanency needs in a timely manner and as informed by their development needs.

Rather than potentially introducing new providers to the sector, existing agencies should be provided with resources to build their capacity and remove the administrative burdens to providing emergency short-term care.

Further, introducing more providers in an already overcrowded sector will continue to reduce and dilute existing resources and funding which could be effectively utilised by long established, accredited agencies. The PSP initiatives have created opportunities for agencies to pursue permanency outcomes with specific, tailored care packages for children. Resources should be directed towards creating different service and funding models, which would be tailored to the individual needs of children.

Provisionally accredited agencies progressing to full accreditation

Key proposals:

11. Change OCG policies to provide for provisional accreditation to commence on the date on which an agency first makes arrangements to provide statutory OOHC or adoption services.

Barnardos supports this proposal.

12. The Children’s Guardian has the discretion to extend the accreditation of a provisionally accredited agency.

Barnardos has concerns regarding this proposal. Apart from new ACCOs or existing ACCOs that are growing under the above-mentioned proposed strategy, agencies with small numbers should not be providing OOHC and adoption.

Provisional authorisation should be consistent with the identified priorities of the OOHC and adoption sector, inclusive of special consideration for new ACCO providers. There should be no extensions of provisional authorisation for non-ACCO agencies if they have not met prescribed minimum of client numbers.

13. It is a prerequisite for an application to renew accreditation that the agency has provided care in the 12 months prior to its application.

Barnardos supports this proposal.

Assessing applications to renew accreditation and a new approach to monitoring accreditation

*Barnardos supports in principle the proposal that “the OCG proposes to restructure its accreditation renewal and monitoring processes, to provide for **briefer, but more regular monitoring of agencies’ practices**, for the purpose of providing feedback regarding areas of strength and areas for improvement. The information gathered from monitoring visits to the designated agency will inform the Children’s Guardian’s decision whether to renew the agencies’ accreditation”.*

Barnardos supports the proposal that, “when the agency is due to renew its accreditation, the agency’s performance over the course of its accreditation period will determine what type of accreditation renewal assessment will be required. For agencies where there have been no concerns regarding compliance with the Standards, the accreditation renewal assessment will be brief and only focus on a small number of core Standards. For agencies where there have been compliance issues, the renewal assessment will be more comprehensive”.

Key proposals

14. The Children’s Guardian will determine applications to renew accreditation based on an assessment of an agencies’ compliance against the Standards and accreditation criteria. Evidence of compliance with the Standards and accreditation criteria may include:

- assessment of an agency’s practices
- assessment of indirect evidence such as policies and procedures

- discussions with representatives of the agency

Barnardos requires further information about this proposal.

15. The Children's Guardian has discretion to determine an agency's application to renew accreditation as a designated agency or an adoption service provider based on an assessment of compliance with specific Standards, or all Standards and accreditation criteria.

Barnardos requires further information about this proposal.

16. The Children's Guardian may, in determining an agency's accreditation, consider information gathered during monitoring of the agency's compliance with the Standards and accreditation criteria over the course of the agency's accreditation period.

Barnardos requires further information about this proposal.

17. The processes for determining applications to renew accreditation as a designated agency will be replicated to the greatest extent possible for adoption service providers applying to renew accreditation.

Barnardos supports this proposal.

Questions

- What are your views on the proposal for more regular monitoring of agencies' compliance with the Standards and a more streamlined accreditation renewal process?

Barnardos supports the emphasis on streamlining the current monitoring program and accreditation renewal process. However, the proposal lacks detail and without further information on how this will be operationalised and implemented, Barnardos is unable to support the change. Without this information, there is a real risk of the process more burdensome and increasing compliance than what already exists under the current system.

- Do you agree that the Children’s Guardian should have discretion to undertake a briefer accreditation renewal assessment where an agency has demonstrated compliance with the Standards and accreditation criteria over the course of its accreditation period?

Barnardos supports the intent of this proposal. However, Tab B proposes extensive oversight of standards without any detail about how the system would be streamlined. Barnardos requires more detail about how OCG will execute monitoring visits, otherwise the risk is a more frequent duplication of the existing monitoring five-year monitoring regime.

- Do you agree that information gathered by DCJ or other oversight bodies, or information gathered by the OCG for other regulatory purposes should be considered as evidence of compliance with the Standard and other accreditation criteria? What sorts of information should be relevant to the CG’s decision whether to renew accreditation?

It is a reasonable suggestion that the OCG may seek feedback about an agency’s performance from other relevant entities, however this would depend on clear, transparent guidelines of the type of information required and its quality assurance. This proposal requires extensive consultations with agencies as the parameters of the proposal should reflect a mutually shared agreed intent for ongoing quality improvement in the sector and allow for reciprocal responses.

Barnardos supports the OCG considering an agency’s performance outcomes with other regulatory oversight bodies, such as NDIS and ASES, as these accreditations have many areas of duplication relating to governance, financial management, risk management and client focussed practice.

- Do you agree that the proposed processes for determining applications for renewal for designated agencies should be replicated for adoption service providers?

Barnardos supports this proposal, as there should be no differentiation between OOHC and adoption services. This is subject to the above-mentioned concerns.

Accreditation criteria

Key proposals

18. Retain existing provisions for the Minister to approve criteria and other Standards, on the recommendation of the Children's Guardian, for determining applications for accreditation as a designated agency.

Barnardos supports this proposal.

19. Clarify that the Standards and accreditation criteria must address practices that promote the safety, welfare and wellbeing of children and young people.

Barnardos requires further clarification and detail regarding the proposal.

20. Retain the existing provisions for the Minister to approve criteria and other Standards, on the recommendation of the Children's Guardian, for determining applications for determining applications for accreditation as an adoption service provider.

Barnardos supports this proposal provided there is appropriate, prior consultation with agencies.

21. Retain existing provisions regarding a requirement to integrate to the greatest extent possible, accreditation criteria for adoption service providers with accreditation criteria for designated agencies.

Barnardos supports this proposal.

Questions

- Do you agree that the provision regarding what must be included in the Standards should be broadened to include practices that promote the safety, welfare and wellbeing of children and young people in OOHC?

Barnardos supports this proposal, however as suggested above, it requires more detail, particularly if the OCG intends to focus on quality improvement of service delivery to children rather than compliance monitoring.

Transfer of Accreditation

22. A designated agency or adoption service provider can apply to transfer its accreditation to another entity. The application to transfer accreditation must be in a form approved by the OCG.

Barnardos supports the OCG's decision, to retain the provision of the current arrangements that, "the accreditation of a designated agency or an accredited adoption service provider (other than a departmental designated agency) may be transferred to another entity (such as an organisation that is not accredited) in accordance with requirements in the Care Regulation or the Adoption Regulation.

Barnardos notes this is a rare occurrence and should only occur under the circumstances described by the OCG, that is, when a designated agency is undergoing a restructure or merging with another agency.

23. *The transfer of accreditation must be in accordance with guidelines issued by the OCG.*

Barnardos supports this proposal in the above-mentioned circumstances only.

Accreditation Administration

Form and accreditation period

Barnardos supports the proposal that the OCG remove the option of granting accreditation to OOHC and adoption services for 1 year and continue to provide accreditation for a period of 3 or 5 years. This also enables a designated agency and adoption provider to align their accreditation time frames.

Deferral of a decision to renew accreditation

Barnardos does not support deferring an agency's application to renew accreditation for a period greater than one year. It is not reasonable for agencies to be allowed a period of two years to remediate any action plans and/or conditions associated with non-compliance of delivery of services to children. Children should not be subjected to disrupted and inconsistent services, when other compliant OOHC services are already equipped to meet their needs.

Extending accreditation to accommodate change.

Barnardos supports the proposal to extend accreditation to accommodate exceptional and extraordinary circumstances, such as those caused by Covid 19 Pandemic, or to allow agencies sufficient time to amend policies and practices relating to new standards prior to accreditation.

Conditions on accreditation and process of accreditation

Key proposals

24. Retain existing provisions regarding accreditation periods for designated agencies and accredited adoption services providers including provisions to vary or extend accreditation periods to align periods of accreditation for agencies that are accredited as both designated agencies and accredited adoption service providers.

Barnardos supports this proposal

25. Where the Children's Guardian defers a determination of an agency's application to renew accreditation the agency must participate in a risk management program approved by the Children's Guardian.

Barnardos supports this proposal

26. Where a determination on an application for accreditation has been deferred for two years the application is automatically refused, unless the Children's Guardian is satisfied the risk management program should be extended for a further period.

Barnardos supports this proposal for a period of 1 year only.

27. Retain provisions regarding accreditation periods for agencies where a decision on an application to renew accreditation has been deferred.

Barnardos supports this proposal

28. Retain provisions to extend accreditation to accommodate change in the administration of the OOHC and adoption sector.

As stated above, Barnardos supports this proposal, however it should be limited to restructure or mergers.

29. Transfer conditions of accreditation requiring agencies to notify the Children's Guardian of certain things or to comply with guidelines issued by the Children's Guardian to Schedule 3.

Barnardos supports this proposal

30. Impose a condition on all designated agencies that care may not be provided in a private home unless the care is provided by a person authorised as a care under clause 30 or clause 31 of the Care Regulation.

Barnardos supports this proposal.

31. Retain provisions for the Children's Guardian to impose other, reasonable conditions on an agency's accreditation in addition to conditions of accreditation imposed by regulations.

Barnardos supports this proposal

Questions

- Do you agree that there should be a restriction on providing care to children and young people in a carer's private home unless the carer has been authorised under clause 30 or 31 of the Care Regulation? This means, for example that workers authorised to provide emergency care or workers authorised by DCJ to provide special care cannot care for children in their own homes.

Barnardos supports this proposal

- Do you agree that where a decision on an agency's accreditation is deferred, the agency should be required to participate in a risk management program?

Barnardos supports this proposal for a period of 1 year only, along with active OCG monitoring.

Shortening, suspending or cancelling accreditation

Key provisions

32. The Children's Guardian may shorten or cancel the accreditation of a designated agency or an accredited adoption service provider in circumstances where:
- the agency or a principal officer made a statement or provided information that it knew to be false or misleading
 - the agency failed to comply with a condition of accreditation
 - the agency or the principal officer failed to comply with any obligations or restrictions imposed by the Children and Young Persons (Care and Protection) Act 1998 (or the Adoption Act 2000 in the case of an AAP)
 - the agency has failed to either wholly or substantially satisfy accreditation criteria

Barnardos supports this proposal

Providing Greater clarity in the Children's Guardian's functions

The children's guardian may investigate the carrying out of agencies' responsibilities

Key proposals

33. Provide greater clarity in the OCG Act regarding the Children's Guardian's current monitoring and investigation functions in relation to designated agencies and accredited adoption service providers.

Barnardos requires further clarification and detail regarding the proposal.

Questions

- Do you agree with the proposal to provide greater clarity regarding the Children's Guardian's current work in monitoring and investigating designated agencies and accredited adoption service providers?

Barnardos requires more information about the nature and type of investigations the OCG undertakes, besides those associated with accreditation, and whether this information would be made available to all agencies.

Intersection with the Child Safe Scheme

Questions

- What are your views on the statutory OOHC and adoption sectors combining under the Child Safe Scheme?

Barnardos supports this proposal subject to further information about how this will be operationalised and a clear commitment that for agencies that deliver services across sectors, there is appropriate harmonisation.

- What are your views on the 10 Child Safe Standards (and additional sector-specific accreditation criteria) becoming the new standards for the accreditation of statutory OOHC and adoption providers in the future?

Barnardos supports this proposal

- Are there benefits to having one set of standards across all child-related organisations? Or should the statutory OOHC and adoption sector remain as a separate scheme with its own Standards?

Barnardos supports one set of standards across all child related organisations to enable simplicity and consistency in oversight and accountability of these services as many are related or integrated with OOHC providers.

- If your agency provides other child-related services in addition to statutory OOHC/adoption, and the sector supports a separate set of standards for statutory OOHC and adoption providers, do you anticipate any challenges with operating under two sets of standards? Don't we already have this scenario in the child care related regs?

Barnardos does not support two separate sets of standards and would need further information to understand how the OCG would assess compliance under a unified scheme.

- If the 10 Child Safe Standards were to replace the existing standards, what other accreditation criteria should be included to reflect the needs of children and young people in statutory OOHC or adoption? The national child safe standards are way too broad to be useful for OOHC child outcome related purposes – they are about safety not life outcomes which must remain a focus for OOHC

Barnardos is unable to comment on this proposal due to the lack of information from the OCG about how the proposed amendments to shorten and streamline the OOHC and adoption accreditation and monitoring system will operate in practice.

- What are your views on how enforcement would operate for statutory OOHC and adoption providers, under the child safe scheme?

Barnardos is unable to comment on this proposal due to the lack of information from the OCG about how the proposed amendments to shorten and streamline the OOHC and adoption accreditation and monitoring system will operate in practice.