



# **Inquiry into Home Care for Children and Young People**

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April 2024

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## Our Commitment to Inclusion

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The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: <[salvationarmy.org.au/about-us](https://salvationarmy.org.au/about-us)>

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

More information about The Salvation Army is at **Appendix A**.





## Executive Summary

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The Salvation Army welcomes the opportunity to provide this submission to the South Australian Government's Economic and Finance Committee (the Committee) in relation to the Inquiry into Home Care for Children and Young People (the Inquiry).

The Salvation Army provides a variety of youth services that support children and young people across Australia. These services include housing and homelessness, education, employment and training, social and community activities, drug and alcohol services, and youth justice programs.

Our experience tells us that non-family-based care models must be developmentally appropriate, trauma-informed, and supportive. In this submission, The Salvation Army stresses the necessity of care placements that are sustainable and individualised such that children and young people can forge strong connections, experience stability, and a sense of belonging. We support a care model where systems and placements must, at their core, consider and uphold the best interests of the child.

This submission does not directly discuss foster and kinship care placements, however, draws upon evidence from our youth transitional housing programs in South Australia. We focus on the following key themes:

- Immediate, medium, and long term, social costs of supporting children in non-family-based care systems,
- Opportunities and methods to improve non-family-based care systems which minimise detrimental impacts for children and young people, and
- Prevention and early intervention approaches which aim to support children and families at risk of encountering care and protection systems.

The Salvation Army has made **13** recommendations for the Committee to consider. A summary of these recommendations follows on the next page.



# Summary of Recommendations

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## Recommendation 1

1.10 The Salvation Army recommends that the South Australian Government increase investment into transitional living options which promote skill development and pathways to independent living for children leaving care. This should include increasing funding to existing programs to enable expansion of service capacity.

## Recommendation 2

1.15 The Salvation Army recommends that the South Australian Government invest in services and programs which enhance permanency and encourage sustainable connection building for young people.

## Recommendation 3

1.20 The Salvation Army recommends that the South Australian Government commits to ensuring that children and young people in NFBC have equitable opportunity to access educational pathways which are consistent, safe and trauma-informed.

## Recommendation 4

1.24 The Salvation Army recommends that the South Australian Government ensure that NFBC programs are individualised, child-centred and that they prioritise and promote choice for children and young people.

## Recommendation 5

1.28 The Salvation Army recommends that the South Australian Government implement specialist training for child protection staff, frontline community organisations and NFBC services and carers which covers the impacts of trauma, trauma related coping mechanisms, and child-centred best practice. This training should be mandated and regularly repeated.

## Recommendation 6

1.32 The Salvation Army recommends that the South Australian Government provide increased investment in community-based prevention and early intervention services to reduce the need for intensive statutory responses which mandate NFBC arrangements.

## Recommendation 7

1.33 The Salvation Army recommends that the South Australian Government provide widely available training to both the specialist and the wider service sector on identifying and responding to families at risk of engagement with statutory child protection services.

## Recommendation 8

2.11 The Salvation Army recommends that The South Australian Government empower Aboriginal and Torres Strait Islander communities to develop and deliver interventions which are community owned and controlled, and in line with child protection objectives.



## Recommendation 9

2.12 The Salvation Army recommends that the South Australian Government work to address systemic discrimination and prevent ongoing, intergenerational child protection trauma amongst Aboriginal and Torres Strait Islander children, families, and communities. This should include:

- *Reviewing statutory child protection tools and processes to ensure they are trauma-informed, culturally safe, and free from bias.*
- *Actively increasing cultural competency and capability through mandated, cultural, anti-racist and unconscious bias training for child protection staff, first responders, community organisations and carers of young people who have been removed from home.*
- *Implementing cultural support staff or mentors for Aboriginal and Torres Strait Islander children and young people in care to assist in maintaining connection to culture, community and kin, and to advocate for the young person's cultural needs.*
- *Placing Aboriginal and Torres Strait Islander children and young people with extended family, kinship, or foster carers, where possible, to encourage a culturally safe and supportive environment.*
- *Supporting the safe return and reunification of Aboriginal and Torres Strait Islander care leavers to their family and community as a priority.*
- *Developing care plans which are culture-focused and outline specific, actionable strategies for maintaining connection with country, culture, language, and kin.*

## Recommendation 10

2.21 The Salvation Army recommends that the South Australian Government implement specialist training and capacity building for child protection staff and the frontline workforce to ensure accurate, early identification of family violence and coercive control. This should include identifying internal bias or stereotypes, preventing unintentional collusion with persons using violence, and misidentification of victim-survivors

## Recommendation 11

2.22 The Salvation Army recommends that the South Australian Government ensure that child protection responses are, in all circumstances, proportionate, supportive, and trauma-informed for the child and family.

## Recommendation 12

2.26 The Salvation Army recommends that the South Australian Government invest in meaningful, holistic support which aims to address and prevent domestic and family violence through providing support for experiences of disadvantage.

## Recommendation 13

2.7 The Salvation Army recommends that the South Australian Government increase funding to specialised services to support children and young people in NFBC, as victim-survivors in their own right.



# 1 Improving Non-Family-Based Care Systems

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- 1.1 The Salvation Army identifies the critical need for children and young people to have the right to a childhood where they can thrive, be supported, and be empowered. We urge that all non-family-based care (NFBC) and protection responses consider and uphold the best interests of the child in all decision-making processes.
- 1.2 In the context of this submission, we identify that NFBC refers to the alternative accommodation and care arrangements of children and young people who are unable to live with their birth parents, or other family members. The Salvation Army do not provide foster and kinship care services; however, we provide support and accommodation services for children and young people under statutory care orders and who cannot return home. We respond to the Inquiry in this capacity.
- 1.3 Evidence demonstrates that children and young people who are placed in NFBC experience poorer wellbeing outcomes in general, than the broader population. This effect is consistent across educational attainment, physical and mental health, cultural identity, attachment behaviours and connection to community.<sup>1</sup> We recognise the following risk factors as drivers of, and consequences of engaging with statutory care systems and engagement with NFBC:
  - **Chronic homelessness.** The Salvation Army observe that many children and young people who leave care systems, exit into homelessness due to being ill-prepared for independent living upon completion of care orders. This can be attributed to a general lack of timely transition planning and support whilst in care. We note that homelessness is common amongst care-leavers due to severe shortages of affordable and culturally appropriate housing, often resulting in chronic homelessness.
  - **Intergenerational child protection involvement.** In our experience, many children and young people who encounter NFBC and other statutory child protection responses have parents or family members who have also experienced this. The ongoing failure of care systems to respond to and support at-risk families early, perpetuates intergenerational transmission of trauma, child maltreatment and disadvantage.<sup>2</sup>
  - **Obstacles for achieving success in education and employment.** The Salvation Army draws attention to the limited access to quality, continuing education amongst children and young people in care systems. In our experience, repeated relocation between NFBC placements is disruptive rather than supportive and inhibits academic achievement and ongoing commitment to education and employment pathways.
- 1.4 We suggest the following reforms to ensure NFBC promotes best outcomes for children and young people.

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<sup>1</sup> Australian Institute of Health and Welfare (AIHW). (2020). *Australia's Children*. [https://www.aihw.gov.au/getmedia/6af928d6-692e-4449-b915-cf2ca946982f/aihw-cws-69\\_australias\\_children\\_print-report.pdf?v=20230921161957&inline=true](https://www.aihw.gov.au/getmedia/6af928d6-692e-4449-b915-cf2ca946982f/aihw-cws-69_australias_children_print-report.pdf?v=20230921161957&inline=true).

<sup>2</sup> Font, S., Cancian, M., Berger, L. & DiGiovanni, A. (2020). Patterns of Intergenerational Child Protective Services Involvement. *Child Abuse & Neglect*, 99. <https://doi.org/10.1016/j.chiabu.2019.104247>.







## Developing a Coordinated Strategy to Prevent Homelessness Amongst Care Leavers

- 1.5 The Salvation Army urge the critical need to provide sustainable, coordinated service responses to prevent instances of homelessness amongst young people upon the completion of statutory care orders. In our experience, many young people become homeless upon the completion of their care and protection orders, when they ‘age-out.’
- 1.6 Many young people leaving NFBC have historically experienced adverse or traumatic life experiences, severing of care networks and relationships, and placement instability.<sup>3</sup> Evidence suggests that 30 per cent of young people experience homelessness within their first year of leaving care, which can be attributed to inadequate transition planning and limited options for safe and affordable housing.<sup>4</sup>
- 1.7 Young people in NFBC experience an accelerated need to develop independence and valuable life skills. Development of these skills and the young person’s sense of readiness is crucial to their chances of experiencing positive outcomes post care.<sup>5</sup> In our experience, there remains an ongoing lack of adequate and timely transition planning for young people in care, meaning that they may not have fully developed independent living skills prior to ‘aging-out’ of care. The Salvation Army sees, as a result, an over-reliance on crisis housing for care leavers which negatively impacts their wellbeing and compounds experiences of trauma and disadvantage.
- 1.8 Ensuring access to coordinated and integrated service responses, sustainable pathways to independence with enough time to build skills and confidence and equitable housing access, will improve outcomes for young people leaving care. It will promote service continuation from NFBC to independent living, rather than crisis housing responses. These must primarily operate under a trauma-informed and therapeutic lens. In this way, children and young people will be afforded to not only live with dignity, but also thrive.
- 1.9 The Salvation Army draws attention to the important work of our community-based accommodation and support programs which work with young people in NFBC and under statutory care orders, to offer opportunities for growth, skill development, and a path to independence.

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<sup>3</sup> NSW State Government. (2023). *Pathways to Homelessness for Young People Leaving Out-of-Home Care in NSW*. [https://www.facs.nsw.gov.au/\\_data/assets/pdf\\_file/0005/842468/Pathways-to-homelessness-for-young-people-leaving-out-of-home-care-in-NSW-January-2023-Evidence-Brief.pdf](https://www.facs.nsw.gov.au/_data/assets/pdf_file/0005/842468/Pathways-to-homelessness-for-young-people-leaving-out-of-home-care-in-NSW-January-2023-Evidence-Brief.pdf).

<sup>4</sup> Australian Institute of Health and Welfare (AIHW). (2024). *Specialist Homelessness Services Annual Report 2022-23*. <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/clients-leaving-care>.

<sup>5</sup> Centre for Excellence in Therapeutic Care. (2019). *Research: Good Practice in Supporting Young People Leaving Care*. <https://www.cetc.org.au/wp-content/uploads/2022/07/leaving-care-research-brief.pdf>.



### **The Salvation Army's Youth Supportive Independent Living Service (SILS)**

The Salvation Army's SILS is a Department for Child Protection Service in South Australia to support young people from the age of 16 years, under current statutory care and protection orders, until the age of 18 years.

The program provides intensive case management and non-family-based housing support for young people under guardianship of the Chief Executive. Young people live independently in individual or shared accommodation within the community and are provided support based on their level of need.

A team of Salvation Army case managers work to provide these young people the opportunity to develop essential life and living skills, to ensure they are adequately prepared for transitioning into independent living upon completion of their care orders.

### **Recommendation 1**

**1.10 The Salvation Army recommends that the South Australian Government increase investment into transitional living options which promote skill development and pathways to independent living for children leaving care. This should include increasing funding to existing programs to enable expansion of service capacity.**

### Enhancing Permanency in Care

1.11 The Salvation Army's experience is that NFBC programs which focus on permanency and relationship building, see better outcomes for children and young people during and post care placements. Emotional security and development of a sense of belonging during care are significant predictors of positive outcomes for young people.<sup>6</sup>

<sup>6</sup> Campo, M. & Commerford, J. (2016). Supporting Young People Leaving Out-of-Home Care. *Child Family Community Australia*. No. 41. Melbourne: Australian Institute of Family Studies. [https://aifs.gov.au/sites/default/files/publication-documents/leaving-care\\_0.pdf](https://aifs.gov.au/sites/default/files/publication-documents/leaving-care_0.pdf).





- 1.12 The concept of permanency considers three primary factors; relational permanence, physical permanence, and legal permanence, all of which provide children in NFBC with a stable and strong foundation to pursue life goals.<sup>7</sup> Physical stability alone does not necessarily improve the outcomes of care placements, however, how the young person experiences and interprets this stability is critical in promoting positive development. This includes developing a strong sense of 'place' and identity.<sup>8</sup> We see this effect being particularly important for young people who have experienced historical trauma, to encourage psychological safety and recovery.
- 1.13 In our experience, many children and young people in NFBC are moved amongst several different placements across the lifespan of a care order. Young people are often placed with strangers or in residential care facilities which can be scary and overwhelming. This is exacerbated if they have had to relocate several times. The Salvation Army observes this lack of stability to be disruptive and to have detrimental impacts on the child or young person's wellbeing.
- 1.14 We believe that preventing young people from settling in one place safely and securely, inhibits the development of stable relationships and connections, and the ability to foster a sense of trust with staff and carers. The Salvation Army also observes that young people who are moved around NFBC, have difficulty in understanding the opportunities, guidelines and expectations needed to thrive, rather than just survive.



*"We need responses for youth to be based on aspirational models. We need care to be stable and individualised so young people can forge sustainable connections."*



**- A Salvation Army Youth Specialist**

## **Recommendation 2**

- 1.15 The Salvation Army recommends that the South Australian Government invest in services and programs which enhance permanency and encourage sustainable connection building for young people.**

### Accessing Educational Pathways

- 1.16 The Salvation Army urge the critical need to improve educational opportunities and outcomes for young people in NFBC.

<sup>7</sup> Australian Institute of Health and Welfare (AIHW). (2023). *Permanency Outcomes for Children in Out-of-Home Care: Indicators*. <https://www.aihw.gov.au/reports/child-protection/permanency-outcomes-children-indicators/contents/why-is-permanency-important>.

<sup>8</sup> Campo, M. & Commerford, J. (2016). Supporting Young People Leaving Out-of-Home Care. *Child Family Community Australia*. No. 41. Melbourne: Australian Institute of Family Studies. [https://aifs.gov.au/sites/default/files/publication-documents/leaving-care\\_0.pdf](https://aifs.gov.au/sites/default/files/publication-documents/leaving-care_0.pdf).



- 1.17 Evidence suggests that education can be a protective factor for children and young people who have experienced trauma and disadvantage, offering consistency, reliability, and the potential for supportive peer relationships.<sup>9</sup>
- 1.18 Children and young people in NFBC often experience more obstacles in accessing education and when they do, experience gaps due to ongoing experiences of disadvantage. Access to continuing educational pathways is impaired when young people are frequently relocated between care placements. Challenging behaviours which are linked to experiences of trauma also impact access if children and young people are removed from class, suspended, or expelled because of these behaviours, causing them to miss educational opportunities.<sup>10</sup>
- 1.19 The Salvation Army draws attention to the importance of ensuring that children and young people in NFBC are afforded equitable opportunity to access education. Educational settings must be flexible, safe and trauma-informed to ensure children in NFBC can engage in learning settings and pursue educational goals more effectively and with appropriate support.

### Recommendation 3

- 1.20 The Salvation Army recommends that the South Australian Government commits to ensuring that children and young people in NFBC have equitable opportunity to access educational pathways which are consistent, safe and trauma-informed.**

### Promoting Individualised Care and Choice

- 1.21 The Salvation Army draws attention to the need for all NFBC placements to be individualised and in line with best practice standards. Under this principle, it is crucial for care plans and systems to be developed such that they can be adapted and moulded to fit the unique needs of the child or young person rather than vice versa.
- 1.22 Promoting choice is an important element which enhances individualised care and improves the outcomes experienced by young people both in and when leaving care.<sup>11</sup> In our experience, children and young people under statutory care orders and those who reside in NFBC placements, often have limited or no choice about their care arrangements. Case management and support models which promote choice are acutely linked with children and young people feeling genuinely listened and cared for. This practice improves psychological safety, relationship building skills and overall wellbeing outcomes.<sup>12</sup>

<sup>9</sup> Life Without Barriers. (2021). *Revitalising Education for Children in Out-of-Home Care: Social Policy Position*. <https://www.lwb.org.au/ctfassets/qEpY5QVntAcJoiEtP1O8K/>.

<sup>10</sup> Life Without Barriers. (2021). *Revitalising Education for Children in Out-of-Home Care: Social Policy Position*. <https://www.lwb.org.au/ctfassets/qEpY5QVntAcJoiEtP1O8K/>.

<sup>11</sup> Centre for Excellence in Therapeutic Care. (2019). *Research: Good Practice in Supporting Young People Leaving Care*. <https://www.cetc.org.au/wp-content/uploads/2022/07/leaving-care-research-brief.pdf>.

<sup>12</sup> McDowall, J. (2018). *Out-of-Home Care in Australia: Children and Young People's Views After Five Years of National Standards*. Create Foundation. NSW: Australia. <https://create.org.au/wp-content/uploads/2019/03/CREATE-OOHC-In-Care-2018-Report.pdf>.



1.23 The Salvation Army draws attention to the success of care models which consider the needs of the young person on an individual level and promote relationship building, skill development and choice at the centre. See below example.

#### **The Salvation Army's Psychologically Informed Environment (PIE) Model Approach**

The Salvation Army's PIE Model approach works to embed psychologically-informed environments across all service delivery responses such that they are designed and delivered in a way that considers the emotional and psychological needs of all individuals accessing our services.

The approach is a psychosocial model which places young people's experiences, psychological and emotional needs, and their surrounding social environments and systems, at the heart of support responses. Informed by psychological theories and frameworks, the model works to improve the psychological, social, physical, emotional, and spiritual well-being of children, young people, and their families.

The Salvation Army's approach works to empower and support young people to make necessary changes in their lives to improve their emotional, and psychological well-being, relationships with others and development of positive coping strategies. The approach focuses on building trusting and supportive relationships alongside creating safe and nurturing physical spaces for children and young people.

#### **Recommendation 4**

**1.24 The Salvation Army recommends that the South Australian Government ensure that NFBC programs are individualised, child-centred and that they prioritise and promote choice for children and young people.**

#### [Encouraging Workforce and Carer Capacity Building](#)

##### *Understanding Complex Behaviours*

1.25 The Salvation Army observes the need for increased levels of effective, tailored education and training across the child protection workforce and within NFBC settings to understand and respond to complex behaviours amongst children and young people.



- 1.26 Preventing ongoing relocation of children who exhibit challenging behaviours, requires staff and carers to have a common understanding of the impacts of trauma on behaviour and coping mechanisms used by young people who have experienced trauma.<sup>13</sup>
- 1.27 In our experience, multidisciplinary partnerships and collaboration across the NFBC sector are critical to ensure that children and young people in care receive the holistic support they need and to meet their physical, social, and emotional needs. The Salvation Army identify the need to ensure the behaviours of children and young people are contextualised and responded to in the least disruptive and most supportive way.

“

*“Young people are bounced around from placement to placement due to behavioural issues. We need to understand these better, and that behaviours are linked with coping mechanisms.”*

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**- A Salvation Army Youth State Manager**

#### **Recommendation 5**

- 1.28 The Salvation Army recommends that the South Australian Government implement specialist training for child protection staff, frontline community organisations and NFBC services and carers which covers the impacts of trauma, trauma related coping mechanisms, and child-centred best practice. This training should be mandated and regularly repeated.**

#### *Preventing Non-Family-Based Care Placements*

- 1.29 The Salvation Army identifies the value in well-timed responses and interventions which recognise and respond to key warning signs for at risk children and families. These responses are vital in addressing need and preventing last resort statutory child protection responses, which include the removal of a child or young person into NFBC.

<sup>13</sup> Children and Family Intensive Support. (2017). *Child-Centred, Family-Focused Support*. [https://www.dss.gov.au/sites/default/files/documents/04\\_2022/cafis\\_1b\\_-\\_child\\_centred\\_family\\_focused\\_support.pdf](https://www.dss.gov.au/sites/default/files/documents/04_2022/cafis_1b_-_child_centred_family_focused_support.pdf).



- 1.30 Community-based responses which support families to address experiences of disadvantage, are key in preventing future exposure to serious abuse or neglect within many families. Early intervention rather than last resort responses also prevents longer-term harms associated with statutory responses and moving into NFBC, such as disrupting intergenerational cycles. High thresholds for statutory child protection responses and limited access to early intervention support services currently leaves many children and families who experience significant need being unable to access support early enough.<sup>14</sup>
- 1.31 In our experience, a community-led model which focuses on training and upskilling staff and community members who work in support of and alongside children and young people will be best equipped to recognise and provide early support to children and families in need. This should include, amongst others; emergency service staff, general practitioners and allied health professionals (prenatal and from birth), schoolteachers, Centrelink staff, and sporting club members.



*“Child protection is everyone’s business and requires a whole community response”*



**- A Salvation Army Youth State Manager**

### **Recommendation 6**

- 1.32 The Salvation Army recommends that the South Australian Government provide increased investment in community-based prevention and early intervention services to reduce the need for intensive statutory responses which mandate NFBC arrangements.**

### **Recommendation 7**

- 1.33 The Salvation Army recommends that the South Australian Government provide widely available training to both the specialist and the wider service sector on identifying and responding to families at risk of engagement with statutory child protection services.**

<sup>14</sup> Fox, S., Southwell, A., Stafford, N., Goodhue, R., Jackson, D. and Smith, C. (2015). *Better Systems, Better Chances: A Review of Research and Practice for Prevention and Early Intervention*. Canberra: Australian Research Alliance for Children and Youth (ARACY). [https://www.aracy.org.au/publications-resources/command/download\\_file/id/274/filename/Better-systems-better-chances.pdf](https://www.aracy.org.au/publications-resources/command/download_file/id/274/filename/Better-systems-better-chances.pdf).





## 2 Empowering Children and Families At-Risk

- 2.1 All Australians must work together to achieve the best outcomes for children experiencing hardship and disadvantage.<sup>15</sup> The Salvation Army supports the implementation of NFBC systems and programs which at their core, focus on the wellbeing and unique experiences of children and young people such that they are able to reach their full potential. Many of the children supported in NFBC experience disadvantage. The Salvation Army highlights the need for specialised supports to support these children and families who are at risk.

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*“For many young people it is a story of family breakdown, aging out of State care, mental health and substance misuse, intersectional discrimination, lack of appropriate supports and generational disadvantage. These multifaceted factors are further exacerbated by the developmental stage of young people, significantly impacting their psychological, social, physical, and emotional development.”*

”

**- A Salvation Army Youth Specialist**

### Working Alongside Aboriginal and Torres Strait Islander Children, Young People and Communities

- 2.2 The Salvation Army draws particular attention to the ongoing impacts of systemic discrimination, intergenerational trauma and disadvantage experienced by Aboriginal and Torres Strait Islander communities. Our experience in supporting Aboriginal and Torres Strait Islander children and young people is that many continue to be unfairly impacted by child protection and NFBC systems.
- 2.3 The consequences of colonisation for Aboriginal and Torres Strait Islander people are vast, intergenerational, and ongoing. Forced displacement and assimilation, intergenerational removal of children, cultural dispossession, social exclusion, and racism continue to impact Aboriginal and Torres Strait Islander communities and creates an environment which perpetuates socio-economic disadvantage and marginalisation.<sup>16</sup>
- 2.4 The National Agreement on Closing the Gap sets the intention to reduce the overrepresentation of Aboriginal and Torres Strait Islander children in out-of-home care by 45 per cent in target twelve.<sup>17</sup> This target remains off track as Aboriginal and Torres Strait Islander children and young people remain overrepresented in the child protection system.

<sup>15</sup> Commonwealth of Australia. (2021). Safe and Supported. *The National Framework for Protecting Australia's Children*. Canberra: Department of Social Services. [https://dss.gov.au/sites/default/files/documents/12\\_2021/dess5016-national-framework-protecting-childrenaccessible.pdf](https://dss.gov.au/sites/default/files/documents/12_2021/dess5016-national-framework-protecting-childrenaccessible.pdf).

<sup>16</sup> Victoria State Government. (2022). *Underlying Causes of Aboriginal Over-representation*. <https://www.aboriginaljustice.vic.gov.au/the-agreement/aboriginal-over-representation-in-the-justice-system/underlying-causes-of-aboriginal>.

<sup>17</sup> Closing the Gap. (Undated). *Closing the Gap Targets and Outcomes*. <https://www.closingthegap.gov.au/national-agreement/targets>.



- 2.5 Whilst we acknowledge the South Australian Government's commitment to reducing the overrepresentation of Aboriginal and Torres Strait Islander children in the child protection system,<sup>18</sup> concerning, overrepresentation is increasing. We urge the South Australian Government to continue to prioritise this commitment.
- 2.6 In 2022, Aboriginal and Torres Strait Islander children and young people experienced the highest ever recorded number and rate of children in out-of-home care, being 10.5 times more likely than non-Indigenous children to be in out-of-home care nationally.<sup>19</sup> This rate of over is exacerbated to 11.9 times in South Australia.<sup>20</sup> On average, 42.8 per cent of children aged 0-17 years in out-of-home care Australia-wide, were Indigenous.<sup>21</sup>
- 2.7 The Salvation Army understands that Aboriginal and Torres Strait Islander children and young people face a vast array of challenges within out-of-home care systems. Social costs for children and young people are often exacerbated by a lack of culturally safe and connected NFBC programs available. Mainstream welfare services are often difficult to access for Aboriginal and Torres Strait Islander children and their families. We see reluctance to engage with child protection and supports due to fear,<sup>22</sup> intergenerational trauma, and a lack of trust spilling from pre and in-care experiences.
- 2.8 The Salvation Army urges the need for focused attention to be placed on ensuring child protection responses and NFBC at all levels, are non-discriminatory and minimise trauma. We identify the need to improve cultural competency and capability amongst frontline child protection staff, community service personnel, NFBC providers and carers.
- 2.9 The Salvation Army highlights the need to ensure that reunification of Aboriginal and Torres Strait Islander children and young people with their families and communities is not overlooked and should be prioritised for those leaving NFBC if safe to do so. We further stress the importance of housing accommodation for Aboriginal and Torres Strait Islander care leavers be culturally appropriate, safe, and acknowledge kinship and community expectations surrounding housing and caring for siblings or family members.

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<sup>18</sup> South Australia State Government. (2021). *South Australia's Implementation Plan for the National Agreement on Closing the Gap*. <https://www.agd.sa.gov.au/aboriginal-affairs-and-reconciliation/closing-the-gap/south-australias-implementation-plan/South-Australias-Implementation-Plan-for-Closing-the-Gap.pdf>; South Australia State Government. (2023). *Voices of Aboriginal Children and Young People to be Heard Through Peak Body*. <https://www.childprotection.sa.gov.au/news/dcp-news2/voices-of-aboriginal-children-and-young-people-to-be-heard-through-peak-body#:~:text=The%20State%20Government's%20commitment%20to,Strait%20Islander%20children%20in%20care>.

<sup>19</sup> Secretariat of National Aboriginal and Islander Child Care (SNAICC). (2023). *Family Matters Report 2023*. <https://www.snaicc.org.au/wp-content/uploads/2023/12/231206-Family-Matters-report-2023.pdf>.

<sup>20</sup> Ibid.

<sup>21</sup> Australian Government Productivity Commission. (2023). *Closing the Gap: Annual Data Compilation Report*. <https://www.pc.gov.au/closing-the-gap-data/annual-data-report/report/snapshot-socioeconomic#seo11>.

<sup>22</sup> Australian National Research Organisation for Women's Safety. (2020). *Improving family violence legal and support services for Aboriginal and Torres Strait Islander Peoples: Key findings and future directions*. (Research to policy and practice, 25-26/2020). Sydney: ANROWS. <https://www.anrows.org.au/publication/improving-family-violence-legal-and-support-services-for-aboriginal-and-torres-strait-islander-peoples-key-findings-and-future-directions/>.



2.10 In line with views of the national Aboriginal and Torres Strait Islander community controlled peak body, Secretariat of National Aboriginal and Islander Child Care (SNAICC) and in respect of Aboriginal and Torres Strait Islander self-determination, we urge for consultation with Aboriginal and Torres Strait Islander communities to take place directly. It is The Salvation Army's hope that this will encourage holistic child protection and NFBC responses to be designed, implemented, and delivered in a manner which is culturally-informed and safe.<sup>23</sup>

### **Recommendation 8**

**2.11 The Salvation Army recommends that The South Australian Government empower Aboriginal and Torres Strait Islander communities to develop and deliver interventions which are community owned and controlled, and in line with child protection objectives.**

### **Recommendation 9**

**2.12 The Salvation Army recommends that the South Australian Government work to address systemic discrimination and prevent ongoing, intergenerational child protection trauma amongst Aboriginal and Torres Strait Islander children, families, and communities. This should include:**

- **Reviewing statutory child protection tools and processes to ensure they are trauma-informed, culturally safe, and free from bias.<sup>24</sup>**
- **Actively increasing cultural competency and capability through mandated, cultural, anti-racist and unconscious bias training for child protection staff, first responders, community organisations and carers of young people who have been removed from home.**
- **Implementing cultural support staff or mentors for Aboriginal and Torres Strait Islander children and young people in care to assist in maintaining connection to culture, community and kin, and to advocate for the young person's cultural needs.**
- **Placing Aboriginal and Torres Strait Islander children and young people with extended family, kinship, or foster carers, where possible, to encourage a culturally safe and supportive environment.**
- **Supporting the safe return and reunification of Aboriginal and Torres Strait Islander care leavers to their family and community as a priority.**
- **Developing care plans which are culture-focused and outline specific, actionable strategies for maintaining connection with country, culture, language, and kin.**

<sup>23</sup> Secretariat of National Aboriginal and Islander Child Care (SNAICC). (2021). *National Framework for Protecting Australia's Children 2021-2031*. <https://www.snaicc.org.au/wp-content/uploads/2021/11/SNAICC-ConsultationReport-successor-plan-Nov2021.pdf>.

<sup>24</sup> Allan, L. & Bogle, A. (2024). NSW to Review Child Protection Screening Algorithm Over Concerns About Racial Bias. *The Guardian*. <https://www.theguardian.com/australia-news/2024/apr/08/nsw-child-protection-laws-indigenous-children-in-care>.



## Supporting Families Experiencing Domestic and Family Violence

2.13 The Salvation Army highlights the significant impact of family and domestic violence on children and families encountering child protection responses and NFBC systems. Many of the children we support in NFBC placements or who seek support for homelessness, do so because of domestic and family violence at home. The prevalence of violence against mothers and children within the community and child protection service systems is well established.<sup>25</sup>

### *Understanding How Family Violence Impacts Victim-Survivor Parenting*

2.14 Experiences of family violence significantly impact the parenting actions and choices of victim-survivors of family violence. We are concerned that the way a victim-survivor resists or prevents this violence can be misinterpreted by services and professionals negatively and labelled '*poor parenting*'.<sup>26</sup>

2.15 Victim-survivors may use force or reciprocal violence to protect themselves and their children, or as a means of self-defence or resistance. This violence is generally asymmetrical and can risk misidentification by services of the main user of violence.<sup>27</sup>

2.16 The Salvation Army cautions the misidentification of victim-survivors as perpetrators of family violence. The misidentification of victim-survivors as perpetrators of family and domestic violence can occur in a range of contexts, but it primarily occurs where victim-survivors are misidentified on a domestic violence order or face criminal charges.

2.17 Many of our clients report that the misidentification impacts their trust in the police and often makes them reluctant to report further instances of violence. Treating victim-survivors of violence as perpetrators not only undermines confidence in the legal system and justice responses, but it also denies victim-survivors appropriate support.<sup>28</sup>

### *Ensuring Responses are Trauma-Informed*

2.18 The impact of stress and trauma caused by family violence for victim-survivors, is perpetuated in instances where a child is removed into NFBC.<sup>29</sup>

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<sup>25</sup> Victoria Government. (Undated). *Presentations of Family Violence in Different Relationships and Communities*. <https://www.vic.gov.au/maram-practice-guides-foundation-knowledge-guide/presentations-family-violence-different>.

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

<sup>28</sup> Nancarrow, H, Thomas, K, Ringland, V & Tanya, M. (2020). *Accurately identifying the 'person most in need of protection' in domestic and family violence law*. Australia's National Research Organisation for Women's Safety (ANROWS). <https://20ian81kynqg38b3l3eh8bfwengine.netdna-ssl.com/wp-content/uploads/2019/10/Nancarrow-PMINOP-RR.3.pdf>.

<sup>29</sup> Hooker, L., Toone, E., Wendt, S., Humphreys, C. & Taft, A. (2022). *Recover – Reconnecting Mothers and Children After Family Violence: The Child-Parent Psychotherapy Pilot*. (Research Report, 5/2022). Sydney: Australian National Research Organisation for Women's Safety (ANROWS). <https://anrowsdev.wpenginepowered.com/wp-content/uploads/2022/03/RECOVER-%E2%80%93-RR-Hooker-et-al.pdf>.



- 2.19 The Salvation Army identifies the critical need to ensure statutory child protection and NFBC responses do not operate as punitive responses for protective parents. We urge the need for integrated support to allow victim-survivors to safely leave abusive relationships with their child as a priority response.
- 2.20 Developing safe NFBC placement and contact arrangements requires careful attention to prevent severing the important supportive relationship with a protective parent, whilst also addressing safety risks related to the person using violence.<sup>30</sup> In circumstances where the child has been removed, The Salvation Army urge that there must be focus on restoring parenting capacity to the victim-survivor, at the earliest opportunity it is safe to do so.

### Recommendation 10

- 2.21 The Salvation Army recommends that the South Australian Government implement specialist training and capacity building for child protection staff and the frontline workforce to ensure accurate, early identification of family violence and coercive control. This should include identifying internal bias or stereotypes, preventing unintentional collusion with persons using violence, and misidentification of victim-survivors**

### Recommendation 11

- 2.22 The Salvation Army recommends that the South Australian Government ensure that child protection responses are, in all circumstances, proportionate, supportive, and trauma-informed for the child and family.**

### *Understanding the Drivers of Violence*

- 2.23 In our experience, families engaged with the child protection and NFBC systems often have an experience of family violence.
- 2.24 Evidence suggests links between risk of child maltreatment, community violence, harsh parental discipline, and neglect being increased amongst families who experience disadvantage, and who have limited access to community support services.<sup>31</sup> In our experience, this disadvantage includes amongst others, financial hardship, poverty, and homelessness.

<sup>30</sup> Lovatt, H. (2020). *Domestic and Family Violence and its Relationship to Child Protection*. Queensland: Domestic and Family Violence Research Centre (QCDFVR). <https://noviolence.org.au/wp-content/uploads/2020/10/Child-Safety-Research-Paper-with-Template-1-.pdf>.

<sup>31</sup> Morris, M., Marco, M., Maguire-Jack, K., Kouros, C., Bailey, B., Ruiz, E. & Im, W. (2019). Connecting Child Maltreatment Risk with Crime and Neighborhood Disadvantage Across Time and Place: A Bayesian Spatio-Temporal Analysis. *Child Maltreatment, 24*(2), 181-192. <https://doi.org/10.1177/1077559518814364>.

2.25 The Salvation Army identifies a critical need for statutory child protection responses to understand common drivers and consequences of violence and abuse in the home, and whether it occurs as a response to experiences of familial disadvantage. Thorough investigations must be undertaken where a child is at-risk to identify causes of family violence and to determine whether it may be addressed within the community, or whether the most effective response is to remove the child into NFBC.

### Recommendation 12

**2.26 The Salvation Army recommends that the South Australian Government invest in meaningful, holistic support which aims to address and prevent domestic and family violence through providing support for experiences of disadvantage.**

#### *Amplifying the Voices of and Supporting Children as Victim-Survivors in their Own Right*

- 2.1 Children are often ‘silent victims’ of family violence.<sup>32</sup> The Salvation Army draws attention to the need to amplify and listen to the voices of children in NFBC who are victim-survivors of family violence in their own right. Repeated and ongoing abuse, or exposure to domestic and family violence have deep and traumatic impacts on children and young people. These traumatic experiences are cumulative and result in confusion surrounding the safety of ‘home’ and attachments to family members.<sup>33</sup>
- 2.2 Wherever able, children and young people should be engaged as individuals, through forums that are tailored according to their age and development.
- 2.3 The Salvation Army also highlights the importance of engaging the voices of Aboriginal and Torres Strait Islander children. For Aboriginal and Torres Strait Islander children it is critical that engagement and resources are culturally appropriate and community driven.
- 2.4 Current access to specialist services for children and adolescents who are victim-survivors of family violence, or who choose to use violence, are limited or difficult to access. This is deeply problematic considering that a lack of appropriate and timely intervention can result in long-term impacts.<sup>34</sup> Evidence shows that family violence can have lifelong harms for children and those around them, including psychological and behavioural impacts, health and socioeconomic impacts, and increased risk of intergenerational violence and re-victimisation.<sup>35</sup>

<sup>32</sup> O'Brien, W., Fitz-Gibbon, K. (2016). ‘*Silent Victims*’: royal commission recommends better protections for child victims of family violence. <https://theconversation.com/silent-victims-royal-commission-recommends-better-protections-for-child-victims-of-family-violence-56801>.

<sup>33</sup> Lovatt, H. (2020). *Domestic and Family Violence and its Relationship to Child Protection*. Queensland: Domestic and Family Violence Research Centre (QCDFVR). <https://noviolence.org.au/wp-content/uploads/2020/10/Child-Safety-Research-Paper-with-Template-1-.pdf>.

<sup>34</sup> Victims of Crime Commissioner. (2023). *Victims’ Charter Guidelines*. <https://victimsofcrimecommissioner.vic.gov.au/media/buzlgioh/vocc-victims-charter-guidelines.pdf>.

<sup>35</sup> Richards, K. (2011). Children’s Exposure to Domestic Violence in Australia. *Trends & issues in crime and criminal justice*. No. 419. Canberra: Australian Institute of Criminology. <https://www.aic.gov.au/publications/tandi/tandi419>.



- 2.5 Wherever able, children need to be engaged and supported as individuals, through systems that recognise their needs and the benefit of intervention to prevent long-term negative impacts of trauma. Children need to be able to access timely case management and therapeutic responses that promote their participation and are tailored according to age and development.<sup>36</sup>
- 2.6 In our experience, there is a need for genuine partnership between NFBC and youth specific domestic violence support organisations and services, to ensure specialised support is available for children, when and how they need it.

### **Recommendation 13**

- 2.7 The Salvation Army recommends that the South Australian Government increase funding to specialised services to support children and young people in NFBC, as victim-survivors in their own right.**

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<sup>36</sup> Safe + Equal. (Undated). *Supporting Children and Young People*. <https://safeandequal.org.au/working-in-family-violence/tailored-inclusive-support/children-and-young-people/>.

### 3 Conclusion

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- 3.1 The Salvation Army thanks the South Australian Government's Economic and Finance Committee for the opportunity to provide a written submission to this inquiry.
- 3.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from [government.relations@salvationarmy.org.au](mailto:government.relations@salvationarmy.org.au).

**The Salvation Army Australia Territory**

**April 2024**





## Appendix A About The Salvation Army

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The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <  
<https://www.salvationarmy.org.au/>>

