



youth affairs network qld

## ***Achieving Outcomes with Vulnerable Young People***

**The Youth Affairs Network of Queensland (YANQ) response to:**

**Department of Families (2010) Youth at Risk Initiative: Draft for Consultation - November 2010, Queensland Government**

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## Introduction

The Youth Affairs Network of Queensland Inc. (YANQ) is deeply committed to ensuring a high quality service delivery system for young people throughout Queensland, which is strongly evidence-based and reduces the number of vulnerable young people in the Queensland community. This goal is highly compatible with the outcomes sought by the Office for Youth (OfY) Youth at Risk Initiative.

YANQ is concerned that the proposed Youth at Risk Initiative would fail to achieve these outcomes. Essentially, this consultation paper proposes that the current variety of services funded by OfY be replaced by a narrower range of services, delivered more intensively, to a smaller number of young people. It proposes discontinuation of the current *safety net* provided by OfY-funded early intervention and prevention services. Implementation of the Initiative can be expected to diminish the quality of service delivery, lead to duplication of services and contribute to an increase in the number of vulnerable young people in Queensland.

YANQ is an independent, incorporated body. We currently receive core operational grant through the Office for Youth. This proposal proposes a major change in YANQ's role. In the past, we have provided a wide variety of services, including (but not limited to) developmental activities across the entire youth sector in Queensland. It is proposed that YANQ's activities be largely restricted to supporting the implementation and ongoing development of the Youth at Risk Initiative. We are concerned that this proposed change of role would be to the detriment of the youth sector in Queensland.

## Implications for Services and Young People

Whilst supporting the outcomes sought in the OfY paper, the proposed approach to achieving these outcomes may be counterproductive. Implementation of the Youth at Risk Initiative could be expected to result in:

- A significant reduction in the number of preventative and early interventions with vulnerable young people.
- Reorientation of resources toward crisis-driven work with young people already at imminent risk of involvement in the youth justice and/or child safety systems or already in these systems.

Ultimately, the proposal can be expected to lead to an increased number of young people in the youth justice and child safety systems.

### Diminished Outcomes

YANQ is concerned that this proposal would institutionalise an inefficient system which:

- **Establishes systemic duplication of services for many young people** (particularly those already in the youth justice and child safety systems). It proposes application of the same model of service (case management) in both statutory and non-government services.

and/or:

- **Reduces services for many at risk young people.** The paper fails to acknowledge withdrawal of services from those many young people who will be unwilling to disclose their risk status as a condition of accessing services. It proposes that current, successful early intervention and prevention programs should no longer be funded through OfY.

Historically, the youth sector's role has been complementary to statutory systems:

- Providing **different opportunities and approaches** to young people in the youth justice and child safety systems. Choice of services is not duplication. Rather, it increases the likelihood that one of a variety of approaches will meet the needs of a particular young person.
- Providing services to **different young people** – that is, young people outside the youth justice and child safety systems. This includes young people at various levels of risk. A key to the success of this work with young people has been the capacity to gradually build trust with young people until they are ready to disclose their risk factors.

Vulnerable young people are particularly cautious of professionals who seek to intervene in their lives. They are particularly resistant to case management and any other form of intervention that reduces the level of power they have in their lives. This is why services which are responsive to young people's perception of their needs and priorities are most likely to be successful. Young people with a history of involvement in statutory systems are particularly unwilling to agree to information sharing about their lives.

Withdrawal of the *soft entry point* to services currently available through many of the programs funded by OfY can be expected to lead to a significant reduction in the number of young people seeking services. This would remove the opportunity for vulnerable young people to gradually, and informally, build the high levels of trust in workers/services required to seek help. We are concerned that the proposed approach would invariably lead to less young people disclosing their vulnerability at a time when early intervention and prevention are still possible. Many young people would only disclose their risk factors when already at the point of crisis.

Youth services should offer a very different, albeit complementary role. At an individual level, non government organisations should provide a variety of types of services for young people. At a collective level, they should address the factors most likely to contribute to homelessness, criminalisation or the need for protection, amongst young people. However, the paper argues that services should focus on work with individual young people. It implies that workers will be required to work in a similar way to statutory government staff, applying models such as case management, which take power over young people and fail to support them to learn to make decisions and build resilience.

Services cannot be said to be *duplicated* if they offer young people choices – very different services to meet their needs and rights. To work with these children and young people using similar models and approaches to statutory workers, would clearly institutionalise systemic duplication of services – at the expense of existing services which provide greater choice for these young people, and services to a variety of other young people outside statutory systems.

## Unclear Target Group

At different points, the paper gives different messages about whether or not services would be required work with young people already being provided with services through the child safety and youth justice systems. From early in the paper, it is suggested that:

*Funded services will be expected to focus on young people considered most at risk of homelessness or involvement in the youth justice or child safety system (our emphasis, page 4).*

On the same page, it is implied that workers in funded services should work with young people who are already homeless, or involved with these systems. Alongside instructions on factors to

consider when assessing risk, the first factor cited is *offending history*. Factors such as *repeated out-of-home-placements* and *exiting care* follow. Young people involved in the youth justice and child safety systems are identified as part of the group which *may have higher exposure to multiple risk factors*.

The children and young people in these systems are already under the responsibility and authority of statutory government workers. What is the role of funded non-government services, if they are required to implement the same approaches as statutory services? Will independent NGO's be expected?

- To take on the responsibilities of a statutory worker, without the commensurate authority?
- To duplicate the role of statutory workers?
- To accept direction on service provision from statutory workers?

Regardless of the answers to these questions, it is clear that the proposal would inevitably lead to a significant reduction in the quality and quantity of services provided by NGO's to young people.

## Failure to Reduce Risk

The strong association between criminalisation and social disadvantage amongst young people is overwhelmingly supported by the available evidence. Just a few of the demonstrated risk factors are:

### Common underlying causes include:

- Socio-economic disadvantage or social minority status
- Family poverty and isolation
- Limited access to income
- Lack of housing/homelessness
- Imprisonment and criminalisation of parent or young person
- Limited access to health services (including substance abuse and mental health support)
- Lack of appropriate training/employment options
- Discrimination, social attitudes & fear-based social messages
- Teacher/school attitudes and behaviour
- Perceived irrelevance of school
- Lack of support for specific learning needs
- Family and domestic violence
- Lack of access to social/recreational options

### Common effects of these include:

- Repeated out-of-home placements
- Problems associated with exiting care
- Post-incarceration trauma
- Death, loss and trauma
- Early pregnancy
- Peer or parental rejection/neglect or bullying
- Truancy, suspension and exclusion
- Associating with criminalised, abused and/or socially isolated peers

**And the ultimate outcomes of these causes and effects are individual characteristics** such as poor social skills, low self-esteem, self injury, substance abuse, low self-control and disregard for others.

This proposal fails to address the central risk factors which have been consistently demonstrated to contribute to criminalisation of young people. It fails to recognise the evidence about the context in which young people offend. It fails to enable preventative work with vulnerable groups of young

people. In short, it focuses on addressing symptoms, rather than causes, of youth homelessness and involvement in the child safety and youth justice systems.

## Less Responsive Services

YANQ is deeply committed to a sector which provides responsive services to young people. The list of features of responsive service delivery proposed in the OfY consultation paper (page 5):

- **Is highly individualised and behavioural.** The paper suggests that services should almost exclusively focus on addressing the individual risk factors cited on page 4. The evidence consistently demonstrates that individual risk factors largely derive from young people's circumstances – that is, social/community risk factors. As acknowledged on page 4, at risk young people overwhelmingly come from socially disadvantaged groups. Without addressing the factors which contribute to their social disadvantage, any youth work response can be expected to be superficial at best, and destructive at worst. The paper effectively blames young people for their circumstances through focusing on their behaviours (a common effect) rather than their circumstances (the primary cause).
- **Is worker-driven.** The overwhelming evidence demonstrates that vulnerable young people are particularly unresponsive to adult attempts to control their lives, take the place of their parents or treat them as children. An adult/worker cannot control whether a young person does, or does not, trust them. An adult/worker cannot make a young person feel motivated. Effective service provision, particularly with this cohort of young people, relies on working within young people's context and locating control over their lives with the young person. It is most effective when the worker sits alongside young people and works within their frame of reference to value-add to their ability to address their perception of their needs. It is most effective when services are designed to working within the gender, age and cultural context of young people. As proposed in the principles for Aboriginal and Torres Strait Islander young people, organisations should be encouraged to employ staff with a high level of affinity with these targeted groups of young people.
- **Fails to address the primary risk factors.** No amount of personal support will help a homeless young person in the absence of access to safe, secure affordable housing – for themselves and/or their family. No amount of encouragement to attend school will help a young person who has learning needs which are not being addressed within the school system, or who feels unsafe attending school. No amount of counselling will make up for being forced to live with strangers, or take away the trauma arising from imprisonment. No amount of strategising about how to respond to racism, or homophobia, or transphobia, will diminish the experience of discrimination for young people. Addressing the external factors which generate (the imperative for) young people's risk status, should be at the top of the list. These factors are completely absent from this proposal.

Young people will not respond to service delivery unless they perceive it as responsive to their real needs and priorities. Even those who are legally *children* are unlikely to voluntarily engage with services which seek to impose solutions on them. Non government services do not have (or seek) the legal authority to direct young people. To use a directive approach to service delivery is inconsistent with both the needs of young people and NGO's capacity to play a viable role with young people.

Whilst not disagreeing with many of the items identified, the list on page 5 fails to address key elements of responsive and effective service delivery to vulnerable young people. YANQ has developed a more comprehensive list of risk and protective factors (see our response to Question 3 below) which could be used to reframe these factors to take better account of the evidence.

## Implications for YANQ Obligations to the Youth Sector

YANQ receives its core operational grant through Office for Youth (OfY). YANQ also receives project-specific funding from various State and Commonwealth government departments, especially for projects related to social justice target groups.

### YANQ Priorities & Purpose

YANQ is the peak youth affairs body in Queensland. We are accountable to our membership for our values, vision/purpose and objects/priorities. As an independent, incorporated body, we are constitutionally required to work in a way which is consistent with these documents. These include concern with the rights and needs of all young people in Queensland.

As the youth sector peak body in Queensland YANQ's purpose is detailed in our Constitution:

*... the Network seeks to influence the agenda in the youth sector. Informed by its members, and consistent with its Values and Vision, the Network aims to establish directions and voice positions that promote interests of the sector and/or its members and thereby contribute to social and cultural change. (YANQ Constitution, 3. Purpose)*

YANQ is obliged to focus on our stated purpose which is detailed in the Values and Vision. We are obliged to ensure that all YANQ decisions are consistent with these documents, which are formally appended to the Constitution.

YANQ's direction and priorities are determined by our vision. This is summarised in the objects of the association:

- 1. To promote the interests of the youth sector, particularly the interests of disadvantaged and marginalised young people, throughout Queensland.*
- 2. To enable the participation of and collective self advocacy by young people, particularly disadvantaged and marginalised young people, in the Network and the wider community.*
- 3. To advocate with and for young people, particularly disadvantaged and marginalised young people.*
- 4. To lobby to achieve long term social change in the interest of young people particularly disadvantaged and marginalised young people.*
- 5. To support and encourage the development of new means of meeting the rights and needs of young people, particularly disadvantaged and marginalised young people.*
- 6. To contribute to the development of the youth sector through networking, research and information provision.*
- 7. To develop policies on issues affecting the youth sector.*
- 8. To ensure that the Network has adequate resources to properly address issues affecting the youth sector.*
- 9. To function in a manner consistent with the Values and Vision of the Network.*

(YANQ Constitution, 4. Objects)

## YANQ's Peak Body Responsibilities

The important, even indispensable, contribution of peak bodies to maintaining a vibrant democracy has been widely recognised. For example:

*Independent not for profit organisations ... bring distinctive value to society and fulfil a crucial role that is distinct from both the state and the market. They act as pathfinders for the involvement of users in the design and delivery of services and often act as advocates for those who otherwise would have no voice. In doing so, they promote equality and diversity. They help to alleviate poverty, improve the quality of life and involve the socially excluded. Effective consultation and policy appraisal is an essential part of ensuring that a relationship works and that the sector is able to fulfil its strategic role.*

(UK Code of Good Practice cited in Quixley 2006:12)

The value of community services industry peak bodies in ensuring the responsiveness of society to all its members has grown alongside our increasingly complex social structure. Peak bodies both respond to government initiatives and undertake proactive advocacy. The contribution of peaks to society is multi-dimensional, and includes:

- Improving government outcomes - contributing both to the quality of government policy making (through ensuring policies and programs are relevant to changing social needs) and to the quality of service delivery (through supporting community organisations).
- Increasing democratic participation - helping governments achieve their objective of participation in the political process and enhancing the skills and opportunities for democratic participation in wider civic and political affairs by their members.
- Improving quality of life – improving the overall quality of life in Australian society, through improving the quality of life of a particular group in society, or addressing a particular problematic issue.

Community services industry peak bodies play a similar role to think tanks, business groups, professional associations, state/national trade union bodies, community interest groups and primary producer organisations. All these different types of *peak bodies* have a role which is defined by their membership, and commonly receive government funds to enable them to function within their member-determined mandate. The government funding provided to peak bodies in the community services industry represents a small fraction of the total funds distributed by governments for a range of advocacy-related activities – research, projects, consultation, surveys, provision of advice, etc.

The Australian Industry Commission recognised the following legitimate roles for peak bodies:

- *information dissemination;*
- *member support;*
- *coordination;*
- *advocacy and representation; and*
- *research and policy development.*

(Industry Commission 1995 cited in Quixley 2006:5)

Indeed, in 2000 the Queensland Department of Premier, in *Draft Discussion Paper – The Role and Function of Peak Council*, adopted part of the Industry Commission's definition. The Paper described a peak council/body as a *representative organisation that provides information dissemination services, membership support, co-ordination, advocacy and representation, and research and policy development services for its members and other interested parties* (Department of Premier 2000 cited in Quixley 2006:5).

YANQ's purpose and objects are typical of peak bodies. Many studies have examined the role of peak bodies in Australian society. Common to most definitions is the idea that, whilst peak bodies may also resource/support their members as a part of their overall role, they must also have a key outward looking role and focus on representing the interests of their constituents.

## Future Role of YANQ

This paper implies that YANQ should take its direction from Office for Youth and narrow our focus to meet OfY-determined priorities. It implies that we should put aside our broad-based responsibilities to youth workers, young people and youth organisations across Queensland; that we should prioritise marketing and supporting sector implementation of a narrowed range of services to a relatively small cohort of young people.

YANQ has the mandate (as detailed in Objects 5 and 6 above) to support the development of innovative services in the sector – provided that these innovations *contribute toward meeting the right and needs of young people*.

There are 2 key problems with the proposed role of YANQ as outlined in the OfY Paper:

1. YANQ is deeply concerned that the proposed Initiative will fail to contribute toward meeting the rights and needs of young people.
2. YANQ is obliged to provide a variety of services to the youth sector in Queensland and cannot limit its role to supporting service development in a single program area.

As is clear from this response, YANQ has serious concerns about the merits of the redirection of funds proposed in the OfY paper. In keeping with our purpose and objects, it is critical that YANQ continue to monitor and gather evidence on the effectiveness of a wide variety of approaches to addressing the needs and rights of young people in Queensland. YANQ can, and should, play a central role in examining the evidence related to youth needs and service provision, and fearlessly advising government. We cannot do this, if our funding restricts our activities to supporting specific government initiatives such as the Youth at Risk Initiative.

YANQ is committed to the highest levels of integrity and accountability. We take our financial and functional accountability to funding bodies for the resources they provide, very seriously. It is equally central to our integrity that we locate accountability for our values and priorities with our membership, which is drawn from across the youth sector in Queensland.

Accordingly we recommend that, regardless of the outcomes of this consultation process, OfY continue to fund YANQ to achieve its wider objects as outlined in the YANQ Constitution.

## Responding to the Consultation Questions

YANQ is concerned that the following questions fail to address the key issues. They assume that this Initiative is the best way to address the needs of young people, particularly those at risk. As outlined above, YANQ believes that the evidence indicates the need for a different approach.

1. **Do you have any comments about the proposed target groups for the Youth at Risk Initiative having a primary focus on those aged 10 - 18 years and secondary focus on those aged 19 – 25 years? For example, should the age groups be changed to 10 - 18 and 19 - 21 years?**

The consultation paper fails to provide any rationale for this significant change in the age of the target group of funded services. Youth work generally occurs at the point at which children and young people are beginning to self-identify as independent, or capable of being independent. A limited number of 10 - 13 year olds self-identify in this way, and youth workers certainly provide services to these young people. However, youth workers generally work with 14 or 15 year olds and above. Youth workers are rarely trained or experienced in

working with children. Work with dependent children involves a completely different set of competencies, to work with young people who are more independent.

The Victorian Government has taken a more appropriate response to age-based target group. The Victorian strategy recognises that 10 year olds commonly fall outside *the typical period of adolescence* (State of Victoria 2010:3). The stated target age of 10 – 25 has been included to allow workers to engage with those few young people who begin adolescence at an earlier age. The Victorian paper does not suggest that youth workers should suddenly be required to work with children. Nor does it propose that young people over 18 – particularly those who are particularly vulnerable due to their forced exit from the child safety and youth justice systems – should take second priority in service delivery.

It would be a matter of considerable concern, if children at risk of homelessness or involvement in the youth justice or child safety systems were not already receiving support through existing statutory authorities and schools. If this is the case, it would logically follow that additional resources should be focused on up-skilling staff in statutory settings (who already have extensive skills in working with children), to be able to identify and respond to the needs of at risk and vulnerable children. This would be more efficient and effective than re-orienting youth work programs to address the needs of such a different target group, and having to re-train youth workers to work with children.

2. **Are there other risk factors to those outlined on page 4 that you would like considered in the Youth at Risk Initiative?**
3. **Are there other factors which help protect young people that are not listed on page 4?**

The list of factors on page 4 is incongruent with the evidence about the causes of risk amongst young people. It is a rather confused list, which fails to distinguish cause and effect. The factors listed fail to reflect the relative importance of different factors in young people's vulnerability. The effect of this is to imply that young people's vulnerability is largely caused by their individual behaviours or personal deficits. This fails to recognise that these behaviours are an effect rather than a cause of young people's vulnerability.

If risk factors were listed in order of important, this list would be reframed to reflect the balance of the evidence - and would be in (almost) reverse order. Additional factors would be added, and some existing factors would be reframed in a way that is consistent with the evidence about youth development, identity, needs and perceptions:

	<b>Examples of Risk Factors</b>	<b>Examples of Protective Factors</b>
<b>Social Causes</b>		
<b>1. Community risk factors</b>	<ul style="list-style-type: none"> <li>• Socio-economic disadvantage or social minority status</li> <li>• Lack of housing/homelessness</li> <li>• Limited access to income</li> <li>• Over-sentencing and excessive use of remand in the youth justice system</li> <li>• Lack of support services</li> <li>• Lack of appropriate training/employment options</li> <li>• Lack of access to social/recreational options</li> <li>• Discrimination, social attitudes &amp; fear-based social messages</li> </ul>	<ul style="list-style-type: none"> <li>• Poverty reduction</li> <li>• Stable and affordable housing</li> <li>• Access to income and health support services</li> <li>• Access to advocacy services.</li> <li>• Law reform</li> <li>• Access to social/recreational activities</li> <li>• Engagement with supportive adults</li> </ul>
<b>2. Life events</b>	<ul style="list-style-type: none"> <li>• Death &amp; loss</li> <li>• Severe trauma</li> <li>• Criminalisation and imprisonment</li> <li>• Repeated out-of-home placements</li> <li>• Exiting care and incarceration</li> </ul>	<ul style="list-style-type: none"> <li>• Avoiding, surviving and recovering from the harm caused by loss and trauma</li> <li>• Reduced imprisonment/remand rates amongst children and young people</li> </ul>

	• Early pregnancy	
<b>Community Causes &amp; Effects</b>		
<b>3. School risk factors</b>	<ul style="list-style-type: none"> <li>• Teacher/school attitudes and behaviour</li> <li>• Perceived irrelevance of school</li> <li>• Falling behind/lack of support for specific learning needs</li> <li>• Truancy, suspension and exclusion</li> </ul>	<ul style="list-style-type: none"> <li>• Perceived school relevance/responsiveness; school reform</li> <li>• Positive relationships with teachers</li> <li>• Access to youth-friendly support</li> <li>• Regular school attendance</li> <li>• Participation/achievement in school activities</li> </ul>
<b>4. Family risk factors</b>	<ul style="list-style-type: none"> <li>• Family poverty and isolation</li> <li>• Parental criminalisation and imprisonment</li> <li>• Conflict and violence</li> <li>• Sexual, physical and emotional abuse</li> <li>• Parental rejection or neglect</li> </ul>	<ul style="list-style-type: none"> <li>• Parent access to parent-friendly resources and support</li> <li>• Youth access to safe, reliable, youth-friendly resources and support</li> <li>• Reduced imprisonment rates amongst parents (particularly primary carers)</li> <li>• Consistent parental nurturing, support and supervision</li> <li>• Supportive family attachments</li> </ul>
<b>5. Peer risk factors</b>	<ul style="list-style-type: none"> <li>• Peer rejection &amp; bullying</li> <li>• Associating with criminalised, abused and/or socially isolated young people</li> </ul> <p>NOTE: Substantial evidence demonstrates that joining in anti-social behaviour directly emerges from social risk factors.</p>	<ul style="list-style-type: none"> <li>• Social groups of young people's choice are resourced and supported</li> <li>• Positive relationships with peers</li> </ul> <p>NOTE: Substantial evidence demonstrates that associating with pro-social peers commonly occurs amongst young people whose social needs are met, and that young people will continue to identify with the social groups of their choice.</p>
<b>Individual Effects</b>		
<b>6. Individual risk factors</b>	<ul style="list-style-type: none"> <li>• Poor social skills</li> <li>• Low self-esteem</li> <li>• Self injury</li> <li>• Substance abuse</li> <li>• Low self-control</li> <li>• Disregard for others</li> </ul> <p>NOTE: Substantial evidence demonstrates that anti-social attitudes and behaviour directly emerge from social risk factors.</p>	<ul style="list-style-type: none"> <li>• Competent social skills</li> <li>• Regard for self and others</li> <li>• Substance avoidance</li> <li>• Negative life situations which motivates substance use addressed</li> </ul> <p>NOTE: Substantial evidence demonstrates that pro-social attitudes and behaviour directly emerge from having social needs met.</p>

**4. Have you used, or do you know of, an assessment tool that you would recommend for the Youth at Risk Initiative?**

The use of a tool to assess eligibility for services is fundamentally flawed.

Services consistently report that it may take days, weeks or months of informal interaction with young people – a gradual process of relationship and trust building – before young people are willing to name the factors in their lives that place them at risk:

- If young people's involvement in services funded under the Initiative is **involuntary, or lacks confidentiality**: Young people are unlikely to willingly disclose these very risk factors to workers.
- If young people's involvement in services funded under the Initiative is **voluntary, whether or not their privacy is respected**: Young people can be expected to stay away in droves, if they must make themselves vulnerable through a risk assessment process, in order to access services and support.

YANQ believes that the evidence demonstrates that:

- **For young people not currently involved with statutory systems:** Voluntary services available to all young people, provide the most effective and efficient means to detect, and lead to the support of, those young people most at risk.
- **For young people already being provided with statutory services:** Voluntary, confidential services which provide alternative types of support to those available in the child safety and youth justice systems, are most likely to be accessed and used.

Young people at risk are commonly attracted to youth work programs. Availability of programs to all young people, *normalises* young people's involvement. Restricting other young people from participating in programs, places the participation of vulnerable young people at risk. It reduces the likelihood that they will even attend services, let alone voluntarily disclose their needs.

Instead of undertaking individualised assessments with young people, and potentially discouraging their use of services, youth programs should be funded to provide culturally-appropriate (in the widest sense) services, and market these to social groups with higher exposure to multiple risk factors including Aboriginal or Torres Strait Islander young people, CaLD young people, geographically isolated young people and GLBTI young people. This would be a more effective and efficient means of engaging those young people most likely to be at risk, than creating a barrier to their participation through compulsory assessment.

**5. Do you consider the Youth at Risk Initiative principles on pages 5 and 6 to be the correct ones for us to focus on? What would you change or add?**

The principles should aim to address the needs and rights of young people, including use of approaches which build young people's resilience. The order in which they appear should reflect the evidence about the relative impact of the risk factors young people face. The first and pre-eminent principle should be:

- **Address and advocate for young people's rights and needs.** The overwhelming evidence indicates that at risk young people are usually socially disadvantaged. Commonly, their risk is associated with their membership of particular population groups – they are from Indigenous, CaLD, GLBTI and/or rural/remote communities. More specifically they and/or their families are typically severely impacted by poverty, criminalisation, statutory intervention, sexual violence, family/domestic violence, discrimination, (mental) health issues and/or substance abuse issues. They and/or their families have inadequate access to culturally-appropriate, user-friendly income, housing, health, education and employment services. A failure to address these needs destines services to ultimate irrelevance –*shifting deck chairs on the Titanic* – and can be expected to make little difference of long term value in the lives of young people, and the next generation.

Without these rights and needs being addressed, it is not reasonable to expect that young people should be able to *care for themselves*, as proposed in the lead line to the principles.

Like the list of features of responsive service delivery (see our earlier comments), the proposed principles are generally highly individualised and worker driven. They are also internally contradictory – both within and between some individual principles.

YANQ strongly supports the following principles without change:

- **Strengthen culture and connections:** This principle of services being driven by the cultural context of the young person should be extended beyond services to Aboriginal and Torres Strait Islander young people.
- **Evidence-based practice:** As detailed in this response, this principle is not reflected in much of this proposal. Evidence is not provided for most of the opinions expressed by OfY. Further, many of the opinions expressed are counter to the published research evidence and the evidence of youth workers derived from many years of reflection on practice.

YANQ, whilst agreeing with the title of these principles, proposes changes to the following text:

- **Prevention and early intervention:** YANQ believes that this principle is critical. However, its inclusion here must be seen in the context of the proposal that only young people already assessed as *at risk* will have access to services. As detailed in Question 4 above, this will largely preclude early detection of vulnerable young people, because they will be less likely to attend services unless required to do so. To implement this principle effectively would require availability of voluntary services to all young people.
- **Respect and celebrate diversity:** The voluntary nature of services would not preclude provision of services targeted to groups of young people at high risk. Accessibility would be enhanced through offering programs/activities/services specifically designed to the gender/age/cultural context of particular groups with a high incidence of risk. Given the peer-driven frame of reference of most vulnerable young people, provision of some targeted services which explicitly celebrate the identity of particular groups, is likely to be more effective in reaching vulnerable young people, than an exclusively generic service approach. Like Aboriginal and Torres Strait Islander young people, organisations should seek to employ staff with a high level of affinity with the targeted groups of young people.
- **Promote young people's rights:** YANQ strongly supports the notion that youth work practice should be based on the assumption that young people are the *experts in their own lives*. There is some incongruence between this principle, and the use of *case plans* – and any other intervention which is driven by the perceived expertise of workers. Further, case management often functions to undermine young people's rights (particularly their right to privacy) and workers' capacity to promote young people's rights (if in an integrated system which fails to meet young people's rights). Further, on a purely pragmatic level, young people should ultimately determine (rather than simply *participate in*) decisions affecting them – otherwise, they are likely to reject their implementation, no matter how *positive* the decisions are. (See: **Promote young people's participation**).

**YANQ strongly supports interagency cooperation and collaboration.** These are critical to effective service delivery. (In fact, YANQ has spoken out about pressures placed on some workers to reduce their level of participation in interagency networking.) We are very concerned about the implications of the **Coordinated services** principle, as currently written. Use of the phrase *integrated service delivery* seems to imply sharing of information about individual young people and a directive approach to managing their lives. Young people, particularly those who have already experienced statutory service interventions in their lives, value their privacy very highly. The fact that these young people are still at risk, demonstrates the ineffectiveness of this type of intervention for these particular young people. Such an approach would reduce the number of vulnerable young people prepared to become involved in non government services and resulting duplication of services. In particular, for those young people with a history of failed interventions by the child safety or youth justice systems, it would remove their access to services with different approaches which could provide alternate types of support.

## 6. What benefits/challenges do you see with the No Wrong Door approach?

There is a danger that the proposed approach to service delivery would result in a *revolving door*. Unless the fundamental causes of young people's vulnerability are addressed, the failure to provide prevention and early intervention services will generate a new market of vulnerable young people. This approach effectively divides young people into 2 categories:

- Young people who receive no services, and,
- Young people who receive intense services.

Under the proposed system, the only way for young people to access services, will be to wait until they are at risk and prepared to disclose this to a stranger. It is difficult to see how this fundamental challenge could be overcome.

The No Wrong Door concept is exciting. However, its implementation should be reframed to enable a variety of pathways, to a variety of different types of services, for a variety of young people.

## **7. How do you think we can increase collaboration between services so that we can achieve a more integrated approach?**

Genuine, open and effective collaboration generally occurs where trust and mutual respect exist, regardless of whether or not the relationship is documented in a formal agreement. It is critical that relationship building and networking between services is not restricted to activities undertaken by *sector development* organisations such as YANQ. Sufficient time must be allowed for workers to build productive working arrangements through developing personalised relationships with other key local service providers with vulnerable young people.

Effective integration at a service delivery level can only occur where young people give their fully informed consent to information exchange between services. For young people to have a genuine choice about whether or not to provide this consent, they must have the choice to disallow information exchange between services, without any penalty in terms of their access to services. A failure to provide this choice can be expected to lead to young people avoiding services.

An *integrated approach* is not synonymous with a uniform approach. The OfY paper proposes that non government services should be required to adopt and implement the current dominant model used in government service provision. Case management is widely used within the child safety and youth justice systems. This approach has failed to address the needs of large numbers of young people, who only exit this system due to turning 18 (rather than because their needs have been addressed and they are no longer at risk.) It makes no sense to impose a model of service with such questionable effectiveness, when the evidence suggests that other approaches achieve at least equal rates of success. The overall response to young people at risk should offer a variety of different approaches – with an increased likelihood that at least one of these will prove effective with a particular young person.

## **8. Do you have any comments or suggestions about the services to be provided through the Youth at Risk Initiative?**

The *Draft Program Logic* (page 7) is illogical. YANQ strongly supports the short term, medium term, long term and strategic outcomes which the plan aims to achieve. Sadly, the Outputs, in particular, cannot be expected to lead to these outcomes.

Underpinning the Outputs is the assumption that young people must be assessed to be *at risk* in order to access services. It can be expected that this will lead to withdrawal of services for many of the next generation of vulnerable young people. The informal

environment historically associated with youth work allows young people to progressively build trust with workers and disclose personal details at the time of their choosing. In particular, many young people fear that disclosure of their private information will lead to outcomes such as removal from their family, being locked up or imposed statutory care. It can take many weeks or months, for the most vulnerable young people to feel comfortable about sharing these vulnerable life details with a youth worker.

Overall, the Outputs seem to propose a formal, structured service delivery environment. It implies that young people present in the service would need to be attending either an individual counselling/assessment appointment or a structured group activity. No mention is made of opportunities for informal interaction with individuals or groups of young people. This would significantly reduce opportunities for the type of relationship building with young people that is a common predecessor to disclosure of highly personal information.

An assessment-based, case management driven, service delivery model would fail to identify many of the *hidden* vulnerable young people who have not yet engaged with systems and have had no opportunity to assess whether they trust workers sufficiently to talk with them about the risks they face. The evidence would suggest that young people will avoid services, until in acute need – that is, they are in severe crisis, which is well beyond the prevention or early intervention stage.

Further, the case work services proposed fail to focus on addressing the most common risk factors amongst young people, with the exception of access to some areas of health care. Brief mention is made of individual advocacy, but the majority of the text seems to involve youth workers in undertaking needs assessment, service plan management and counselling/therapy. The *practical assistance* identified in the text that follows (page 8) also fails to include critical needs such as housing, yet it does talk about driving lessons. This seems a disproportionate understanding of the needs of vulnerable young people.

At a group program level, direct services to young people seem to be limited to independent living/social/life skills, cultural group development and recreational activities. YANQ recognises the importance of working with social and cultural groups of young people, provided this occurs within the relevant community, and young people's, frame of reference. We recognise that living skills and recreational activities can improve the quality of young people's lives. *Hobbies* and *holidays*, for example, can add value to life and provide a diversion for vulnerable young people ... that is, provided young people's basic needs have already been met.

YANQ is pleased that the important role of community education has been recognised as a legitimate output. Direct service providers are well placed to understand the needs of young people, and to address any misinformation or irrational fears that often drive community isolation of young people, particularly socially disadvantaged groups of young people. The ability to address the discrimination, vilification and harassment most commonly experienced by Murri, GLBTI and refugee young people can have positive, durable outcomes for young people themselves and local communities. However, we are concerned that the *community education, community development* and *cultural identity development* text that follows (page 9), focuses on connecting young people with services and educating young people, rather than addressing community-driven barriers to young people's participation. This, despite the fact that the paper itself provides evidence that Murri young people's risk is *compounded by experiences of racism, loss and trauma*. Murri and CaLD young people may need skills in responding to racism (if they don't have these already) – of greater importance is to address the racism itself within the local community.

Overall, the proposed Outputs fail to even mention any services to address the most common risk factors amongst young people – particularly access to appropriate income, housing, education and employment. It fails to include any provision for non-punitive, formal or informal, family reunification and support. The text that follows about strengthening family relationships (page 8) focuses on providing support in the context of supervision, rather than

providing support to address the issues that commonly place young people at risk, such as family violence, homelessness and criminalisation.

YANQ does not propose to speak on behalf of other so-called *Youth Sector Development Services* (listed on page 3). The limited *Sector Development* functions proposed include activities outside YANQ's mandate, such as coordination of services and addressing service duplication. This fails to recognise the breadth of functions undertaken by YANQ. The particular emphasis under the text that follows on *interagency collaboration* (page 9) suggests that YANQ should particularly provide support to rural and remote workers. Clearly, this would not be possible within YANQ's current, limited resources. The workforce development functions proposed would also require significant additional resourcing to undertake further research into risk and protective factors, and evidence on which models of service best address these factors.

**9. What support will your organisation require from Youth Sector Development services to successfully implement the Youth at Risk Initiative?**

Many of the youth sector development services proposed in this paper fall outside YANQ's current objects and mandate. Further, YANQ is not currently resourced to provide these. YANQ would need to seek advice from the youth sector on whether to take on this new role, and substantial additional resources would be required to implement these services.

**10. Do you have any comments or suggestions about the short-term and longer-term changes that might be achieved through the Youth at Risk Initiative?**

As outlined in our response to Question 8, YANQ supports the short, medium, long term and strategic objectives outlined in the proposal. However, we are concerned that the Youth at Risk Initiative would fail to achieve these objectives.

**11. How would you measure the outcomes of the Youth at Risk Initiative for young people?**

It is impossible to discretely, quantitatively measure the success of a single strategy designed to address a single set of symptoms arising from the many identified risk factors in criminalisation of young people.

Increases in the number of young people in youth prisons in recent years, clearly suggests that the package of strategies currently implemented to address youth criminalisation has been unsuccessful. This is hardly surprising, since they collectively fail to address most of the known causes of criminalisation of young people.

The evidence on the primary causes of young people's vulnerability is clear. Most at risk young people are most commonly affected by many of the following (often interdependent) factors – socio-economic background, homelessness, lack of education/employment, criminalisation, discrimination, substance abuse, mental health issues and wider health issues. **These factors are largely external to non-government service providers typically funded by OfY.**

In the absence of services to address the underlying causes of criminalisation, it would be difficult to legitimately assess the performance of this program. At best, assessment would invariably focus on services' capacity to compete for limited existing resources – to meet the needs of their participants at the expense of other young people ... creating a *revolving door* where a new group of vulnerable young people is then created.

**12. Please add any other comments and feedback.**

YANQ believes that both the process used to develop this proposal, and the proposal itself, are fundamentally flawed. The Office for Youth might find it instructive to look at the process undertaken by the State of Victoria over a 2 year period to improve services for vulnerable young people. Whilst YANQ does not support every element of the resulting Victorian strategy, it is a coherent strategy developed in partnership with NGO's and resourced appropriately.

## References

**Each of the following publications includes evidence in support of the claims made in this response. Unfortunately, YANQ does not have the resources to undertake fact-by-fact referencing - only direct quotes are referenced in-text. Note in particular that the documents about criminalised women commonly include data about vulnerable children and young people.**

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