

A new approach to programs for families and children

Email submission cover sheet

Please complete this form and include it with your submission if you are sending it via email to families@dss.gov.au.

Submissions close 5.00pm AEDT 5 December 2025.

Disclosures:

☒ I have read and agree to the Privacy Collection Notice

☒ I have obtained all relevant consents from all other individuals whose personal information (including sensitive information) has been or may have been disclosed in this submission

Do you consent to the department publishing your response on DSS Engage (*select one*)

- ☒ **Yes** - contains **no** material supplied in confidence and all details can be included in any reports to Government (including those that may be published in the public domain)
- ☐ **Yes, in part** - contains **some** material supplied in confidence (clearly marked as **confidential**) which should not be included in reports to Government (including those that may be published in the public domain)
- ☐ **No** - **is entirely confidential** and should not be included entirely in any reports to Government (including those that may be published in the public domain)

Unless you elect to opt out below, the department intends to use Artificial Intelligence (AI) to help with reviewing submissions provided in response to this discussion paper.

The use of AI will help the department compare, summarise and analyse the responses received.

The department will use Microsoft Copilot (in GovTEAMS, which is a secure platform controlled by the Australian Government) to process submissions made by individuals and organisations that do not opt out of the use of AI.

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If you do not want the department to use AI for your submission, please select the box below.

- ☐ I opt-out of the use AI.

Demographics:

Are you an individual or making a submission on behalf of an organisation? (*select one*)

☒ Organisation

☐ Individual

If an individual, are you a? (*please select one*)

☐ Parent and/or caregiver

☐ Other family member

☐ Other

If an organisation, please complete the following questions:

Organisation name: **Relationships Australia**

Position: **National Executive Officer**

Email: ntebbey@relationships.org.au

1. Is your organisation....?

Select all that apply.

☐ A peak-body

☒ A provider currently funded under one or more of the 5 programs in scope for this consultation

☐ A provider currently funded by DSS, but not receiving funding under one of the programs in scope of this consultation

☐ An Aboriginal and Torres Strait Islander community-controlled organisation

☐ Commonwealth, state or territory or local government agency or body

☐ Research, academic or advocacy organisation

☐ None of the above (*Please specify*)

☐ Prefer not to say

Asked if Q1 (2) (3) and/or (4) is selected

2. What type of service or support do you mostly provide?

Select all that apply

- ☒ A national program and/or information service
- ☒ Prevention or early intervention services
- ☒ Intensive family supports
- ☐ None of the above (*Please specify*)

- ☐ Prefer not to say

Asked if Q1 (2) (3) and/or (4) is selected

3. What state or territory does your organisation deliver services and supports in?

Select all that apply.

- ☒ New South Wales
- ☒ Victoria
- ☒ Queensland
- ☒ Western Australia
- ☒ South Australia
- ☒ Tasmania
- ☒ Australian Capital Territory
- ☒ Northern Territory
- ☐ Prefer not to say

Asked if Q1 (2) (3) and/or (4) is selected

4. Where does your organisation deliver most of their services and supports?

Please select only one answer.

- ☒ Major city
- ☒ Regional area
- ☒ Remote area
- ☒ Very remote area
- ☐ Prefer not to say

2 December 2025

Responses to questions in Appendix A to the Discussion Paper

Vision and outcomes

Does the new vision reflect what we all want for children and families?

Relationships Australia is concerned that the proposed Vision is outdated and fails to reflect the scope and diversity of contemporary families.

Relationships Australia appreciates the opportunity to comment on the Discussion Paper released on 3 November 2025. Relationships Australia is excited by the opportunities, proposed in the Discussion Paper, to undertake a once in a generational transformation of how families and children are supported and equipped to navigate relationship challenges, including relational distress and conflict throughout the lifecycle, while exercising prudent stewardship of taxpayer resources. In particular, we welcome:

- a public health approach, including emphasis on prevention through universal services
- proposals to simplify access to services - lifting from individuals, families and communities in distress the burdens of navigating fragmented systems, and
- reducing compliance and reporting costs currently borne by service providers, including through streamlining grant agreements.

We look forward to working with Ministerial Offices and officials to realise the ambitions canvassed in the proposals. Families and children should not have to wait for services that are enabled to be more responsive, flexible and accessible, and recent progress towards reform has been halting at best. We want to see service design, delivery, accountability and evaluation transformation be fully embedded in how the Commonwealth plays its role in achieving outcomes for children, families and communities.

Over the past five years, Relationships Australia has diverted time and resources to engage with multiple consultations, often conducted in haste and in proximity to an acutely busy time of year, and it has been disheartening to see those efforts lead nowhere in reforming service accessibility and flexibility for our clients.

The responses of Relationships Australia to the questions posed in the Discussion Paper canvass how the reforms proposed in the Discussion Paper could be refined to better ensure successful implementation of reforms that will stand the test of time, and continue to benefit families through flexibility and service innovation. Our recommendations relate principally to timing, the need for co-design, and preparation for the reforms through collaborative capacity and capability building across providers and funders. Relationships Australia's responses also identify issues on which further detail is required from Government to enable current and aspiring providers to engage with the reforms in a way that is most helpful in informing Government of challenges in successful operationalisation of reform in this area. Our responses to the consultation build on:

- previous consultations with the Department of Social Services about programs for families and children
- previous consultations conducted by various inquiries into:

- domestic, family and sexual violence
- abuse, mistreatment and neglect of older adults
- the care and support economy, and the experiences of informal and unpaid carers, and
- poverty and the cost of living
- our submissions to the review by Mr Andrew Metcalfe AO of the Family and Relationships Services Programme administered by the Attorney-General's Department, and
- our submission to the Productivity Commission, commenting on its Interim Report, *Delivering Quality Care More Efficiently* (July 2025). While the Productivity Commission's Interim Report focuses on aged care, disability and veterans' services, the principles and recommendations canvassed in that Report should inform the Department's development of a new approach to services for families and children.

As noted above, this consultation occurs at a moment which affords Government the opportunity to effect a once in a generation transformation of human service design, funding and delivery, evaluation and ongoing improvement. Converging factors include:

- the 2023 release of Australia's first Wellbeing Framework, with its strong focus on measurement
- the publication in August 2024 of the Australian Centre for Evaluation Strategy
- the release in September 2024 report on the review of the Family and Relationships Services Program, administered by the Attorney-General's Department (Metcalf Report)
- the presentation to the Government, in November 2024, of the Not-for-Profit Sector Development Blueprint, developed by the Blueprint Expert Reference Group, and
- the finalisation of the report of the review of FaRS and SFVS programs and the accompanying literature review (yet to be published) and the modelling by Allen + Clarke Consulting (still underway).

Permitting reforms of related DSS and AGD programmes to continue in conceptual, policy and temporal siloes compromises multiple key Government priorities, including ending gender-based violence and violence against children within a generation, Closing the Gap, and ending abuse and mistreatment of older adults.

Accordingly, the central recommendation from Relationships Australia is that Government seize this opportunity to take bold and ambitious action that goes beyond merely streamlining discrete programs within existing silos across the Department of Social Services, the Attorney-General's Department, and the Department of Health, Disability and Ageing, and that leverages collective experience and insights, as well as institutional infrastructure, while also explicitly preserving specialist services, and oversight and robust accountability for taxpayer resources.

Specific comments on the Vision

An outdated and exclusionary understanding of families

While the Discussion Paper emphasises that Government has heard families' and services' advocacy for greater service flexibility and accessibility for all kinds of families, the Vision appears to centre nuclear, Western families. Extended and intergenerational families (of all cultural backgrounds, but especially First Nations people and people from cultures with strong collectivist values) are not reflected in this Vision. Families should be able to access these programs regardless of composition and stage of formation.

Relationships Australia is concerned that the Vision (and, by extension, the outcomes, investment priorities and streams) appears to be premised on an understanding of families that is far removed from contemporary Australia. It is dramatically misaligned with the diversity of family formation and composition manifest across demographic data and appears to disregard the proven socio-economic benefits, under current programmes, of flexible, nuanced and evidence-informed understandings of families.

Because of this, the Vision risks losing elements that have been proved to help families – however composed - navigate relationships throughout the life course, disrupting intergenerational trauma and dependency, and equipping people with skills to bolster their relational health and emotional wellbeing.

The Discussion Paper's focus only on families with children potentially overlooks key prevention and early intervention opportunities to disrupt intergenerational dynamics of conflict and violence. In appearing to discount couples without children, it undermines the Government's objectives (for which DSS is the policy lead) around ending gender-based violence and nurturing a society based on respectful relationships at all points in the lifecourse, and not only when children are part of the family unit.

It is unclear whether this highly constricted and out-dated concept of family is intentional; if so, it appears not to be supported by the evidence base, and Relationships Australia **recommends** that the Vision be explicitly extended to better reflect the diversity of families in modern Australia. If the constriction is inadvertent, Relationships Australia **recommends** that the Vision be amended to reflect the considerations set out below.

Families exist within communities

The Consultation Summary notes, at p 8, that some respondents

emphasised the importance of building and maintaining strong, secure relationships – not just between children and their caregivers, but also between families and their broader communities. These connections were seen as essential for supporting healthy child development and creating a strong foundation for wellbeing.

As children exist within a family context, so do families of all kinds exist within a community. This is acknowledged across a broad range of key Government policies, programmes, strategies and frameworks – many of which fall within the Social Services portfolio. Further, child maltreatment, intimate partner violence and abuse of older adults are the business of the entire communities. One of the most important evolutions in DFV policy has been broad social acceptance that family violence is a matter of public, not merely private, concern. Our society no longer accepts that what goes on behind the front door is no one else's business, and this is an entirely welcome evolution. It should not be compromised, intentionally or inadvertently, by constricting the scope of services with proven benefits.

Relationships Australia **recommends** that the Vision embrace the significance of communities.

Relational wellbeing is fundamental to family life, and needs attention before formation and after separation

Current programs have been successful because they recognise the non-linearity of how people experience relationships and key challenges across the lifecourse, and meet people where they are at when they do seek help – whether through information materials, psycho-social education resources, crisis interventions, or healing and recovery.

To achieve the outcomes identified in the Discussion Paper, a whole of life course approach is needed. This includes when people are children in a family, when they are out on their own and single, when they're in couples or other relationships, when they are parents of children and adolescents. This is rarely a linear progression in contemporary Australia.

Relational wellbeing across the lifecourse and through periods of transition is a prerequisite of population health. Building capacity for safe and meaningful relationships starts at infancy and extends through early childhood and adolescence. Increased prevalence of adolescents using violence in the home and of children and young people engaging in sexual violence against their peers underscores the importance of capacity building for relational health at this developmental stage. Throughout early, middle and late adulthood, preventing relational distress and supporting relational health and skills development pays powerful dividends in scaffolding a flourishing, cohesive community, and permanently disrupting intergenerational cycles of dysfunction, violence, and exclusion.

During adulthood, people leave relationships and form new ones; as they do, universally accessible programs to support safe and meaningful relationships are critical, even if they are currently not 'within a family'. Clients come to us because they have left (or lost) a relationship and want to be in a better place to form new relationships. But the Vision as framed puts at risk the services that currently support this to happen, while entrenching arbitrary and artificial distinctions that do not resonate with how people live their lives and engage in family life. For example, it seems not to encompass:

- couples without children (even if they are intending to have children or expectant couples)
- older adult couples
- older adults caring for adult children, and
- adult children caring for older adults.

The apparent omission of couples without children appears inconsistent with the Government's focus on preventing gender-based violence and DFSV. While the proposed new program cannot be everything to everyone, it should at a minimum support, not undermine, other Government policies (especially ones sitting squarely within DSS' scope).

Similarly, the apparent omission of carer relationships would remove important relational supports in some of our most stressed and least supported relationships, undermining the achievement of Government outcomes relating to unpaid carers, aged care, and care and support for people living with disability. The first and third of these are also with the DSS portfolio, and kicking away vital, evidence-based relational scaffolding for these relationships is, to say the least, very surprising.

Relationships Australia therefore **recommends** that the Vision be refined to reflect a more inclusive and nuanced understanding of the diverse ways in which people live their lives alongside other people, which may not align with a Western definition of 'family' or follow a linear path in navigating lifecourse and relationship challenges. The Vision should also reflect the importance to distressed families and children of holistic, integrated service delivery that is person-centred, child inclusive and trauma and DFV informed.

Agency of children and young people

Given the focus on children and young people, it is unclear whether the views of children and young people have been canvassed during the consultation process, or in the evaluation itself. Certainly, the fact sheets on DSS Engage, for example, explicitly refer to seeking the views of parents and caregivers only. It is surprising to see no

acknowledgement of the agency and voice of children and young people given their centrality to the policy; the Consultation Summary reports, at p 7, that:

People stressed how important it is to include the voices of families, children, and young people in both the design and delivery of services.

Safety

Safety - before, during and after relationship formation and separation – has rightly been a key preoccupation of Government over the past decade. Its importance is made explicit in the Wellbeing Framework, the National Plan to End Violence Against Women and Children, the Early Years Strategy, and the yet to be released National Plan to End Abuse and Mistreatment of Older People. DFSV is prevalent among clients who access the programmes within the scope of the Discussion Paper. Relationships Australia **recommends** that the Vision be amended to explicitly acknowledge the importance of safety within relationships.

The importance of recovery, repair, healing and development

The National Plan to End Violence Against Women and Children rightly highlights the importance of recovery and healing. Relationships Australia considers that capacity building beyond healing is key to population wellbeing. We **recommend** that the Vision acknowledge the importance of recovery and repair of relationships at all points of the lifespan, including through identification of a potential fourth stream.

Promoting national well-being as foundational to intergenerational stewardship

Fairness to future generations should not be viewed through a reductionist fiscal lens. Relationships Australia takes seriously obligations of stewardship for future generations, which transcend the national balance sheet and require us to invest in social infrastructure (tangible and intangible), as acknowledged in Australia's First National Wellbeing Framework (2023):

Measures beyond Gross Domestic Product (GDP), employment and other traditional economic indicators capture what is important to people, communities, and the country both now and in the future (p 7)

Embedding the Vision across Government

The programs under consideration in the Discussion Paper are inextricably linked with the Family Relationships Services Program administered by the Attorney-General's Department, and a range of programs administered by the Department of Health, Disability and Ageing. We understand that Ministerial Offices are committed to achieving better alignment, and Relationships Australia is keen to work with Government to seize this opportunity to take bold and ambitious action that:

- goes beyond streamlining discrete programs within existing silos
- leverages collective experience and insights, as well as institutional infrastructure, while preserving specialist subject matter expertise, and
- is carefully time and sequenced, as proposed in the timetable set out later in our response to this question, to accommodate genuine co-design, embed integrated service delivery and more sophisticated contracting arrangements, and mitigate risks of unintended consequences.

Strategic alignment would be enhanced, and fragmentation reduced, by a cross-portfolio Vision, to be developed by a specialist Secretaries' Board, composed of the Secretaries of:

- the Department of the Prime Minister and Cabinet (as the Department supporting the Minister for Women and the Minister for Indigenous Affairs)
- the Treasury (as the portfolio within which sits the Productivity Commission, the Australian Centre for Evaluation, and the Australian Charities and Not-for-profits Commission)
- the Department of Health, Disability and Ageing
- the Department of Education (as the Department supporting the Minister for Early Childhood Education and the Minister for Youth)
- the Attorney-General's Department, and
- the Department of Social Services.

The specialist Secretaries' Board should drive meaningful, effective collaboration between departments delivering similar services, to reduce duplication and inconsistency, and free resourcing to concentrate on the specialised programmes delivered by each department. There would be accountability for that collaboration at appropriately senior levels, and which would be supplemented by a cross-portfolio Estimates hearing, as has occurred in the past in respect of Indigenous Affairs. This body will be vital to ensure successful implementation of major reforms such as formalising relational contracting and collaborative commissioning, which is proposed by the Productivity Commission.

Initially, the Board would be tasked, as a matter of urgency, to:

- advise Government on a cross-portfolio vision for relational wellbeing as the bedrock of Australia's wellbeing and productivity
- identify and employ alternatives to competitive tendering, allowing services to feel secure to engage in durable, trusting and transparent relationships, and
- ensure that the APS, which for decades has been bound to apply transactional practices in dealing with providers, has the culture, capability and capacity to effectively implement relational contracting and collaborative commissioning.

Over the medium term, the Board should be tasked to:

- deliver a common framework for outcomes measurement, across family and relationships services, DFSV, and community mental health programmes
- consistent with the Productivity Commission's 'report once, use often' principle - deliver a common framework for data collection and compliance reporting and a vehicle by which data and analyses could be shared with providers, and taxpayers, in a timely way, to enable improvement and innovation
- advise Government on changes to the Budget Process Rules to allow cross-portfolio offsets, and offsets from downstream savings, as recommended by the Productivity Commission in its Interim Report; the Productivity Commission identifies that the current rules act as structural obstacles to investment in prevention, and
- quantify the extent to which the FRSP and FARS/SFVS programs are, in practice, subsidising mental health services, supporting families and children who are unable to access specialist mental health services because of location and lack of capacity, and advise Government on how to better allocate resources to limit unintentional cross-subsidisation.

Over the longer term, Relationships Australia recommends that inter-governmental fragmentation be addressed by tasking the First Secretaries Group to accelerate improved

interjurisdictional collaboration and reduce fragmentation across the family law, DFSV, child protection, adult safeguarding and other human services.

Timeframes to successfully implement the Vision

To give this ambition the most chance of success, the sector – and Government - needs a short extension of the timeframes contemplated by the Discussion Paper, to:

- align new contracts with financial years, to meet budget, audit and governance requirements (which, if not met, could adversely affect ability to tender for future contracts)
- avoid adversely affecting service continuity for clients, as well as business operations (eg signing leases, employment contracts etc) over Christmas/New Year, which consistently sees a spike in need for our services; it is not trauma-informed to expect clients to change to new providers around that time of year, and
- build capacity and capability to engage on a relational contracting basis - on a day to day basis, relational contracting is business as usual, but formal relational contracting (f-RC) is a new way of doing business; if a relatively short extension to the timeframes is not provided, this will have a disproportionately adverse effect on smaller providers (including regional and remote providers, and ACCOs), which may inadvertently lead to less diversity in the service ecosystem. This would compromise achievement of the Vision.

A short extension of the proposed timelines would enable:

Timeframe	Action	Reason
By 1 November 2026	DSS undertakes detailed consultation with priority groups, to ensure their voices inform the reforms; these include First Nations communities, culturally and linguistically marginalised communities, people with disability, and children and young people.	This is vital for the proposals as currently framed to transcend their predominantly White, heteronormative and ableist characteristics
	The specialist Secretaries' Board undertakes its work over the coming 12 months to ensure cross-portfolio alignment and buy-in from the central agencies and relevant line departments	Improved cross-portfolio alignment will maximise the benefits of the proposals and address chronic issues of siloing and fragmentation
	Enhance APS and sector capacity and capability to embed f-RC through shared training and resources	Shared instruction, and training resources so that officials and providers all hear the same messages, supporting genuine

		partnership – trust takes time
By 1 February 2027	Invite tenders, based on the advice of the specialist Secretaries' Board	Taking into account the insights gained from this consultation process, as well as the Metcalfe Review and the Productivity Commission work on improving productivity in the care and support sector
By 1 May 2027	Tenders due	Reflecting that tenders will need to be developed in a very different way to support formal relational contracting
1 July 2027	New contracts are announced	To allow 12 months for handovers and development of collaborative partnerships, as well as (where necessary) obtaining premises (including bespoke premises for certain specialist services), licences, recruiting and training specialist staff, promoting service awareness among the community, and supporting continuity of care
1 July 2028	New contracts commence	

Are the two main outcomes what we should be working towards for children and families?

Relationships Australia is concerned that the outcomes, as currently framed, are not inclusive and do not acknowledge human rights, including the inherent value and dignity, of all children and all adults. The emphasis on 'health and resilience' is ableist and in apparent contradiction of Government's policies about human rights generally and the rights of people with disability in particular. Further, use of the word 'health' unnecessarily and inappropriately imposes biomedical and pathologising paradigms.

From attendance at the Canberra Town Hall on 24 November, we understand that the word 'health' was used as a collective term to encompass social and emotional wellbeing, coping skills, capacity for self-regulation and like skills. Relationships Australia **recommends** that explicit reference to these concepts is preferable to importing 'health'.

Relationships Australia further **recommends** that 'empowered' should be omitted in favour of 'enabled and resourced'.

Program structure

Will a single national program provide more flexibility for your organisation?

Relationships Australia has concerns about implementation of a single national program which, depending on the administrative practices and processes established to support it, risk replacing existing siloes with new siloes. We welcome the Government's intention to provide greater flexibility for organisations to provide families with more flexible and more integrated holistic service offerings. However, it is unclear whether the interaction between a single national program and the proposed three streams will provide greater flexibility, or inadvertently entrench different silos. This would be the case, for example, if providers were still to be required to provide multiple reports to DSS, within the scope of the new programme.

In response to this question, Relationships Australia **recommends** that the Government take account of the following considerations.

Fragmentation as a barrier to flexibility

Relationships Australia has long advocated for greater flexibility to enable our organisations to deliver holistic services without unnecessary or disproportionate reporting and compliance burden. Almost every submission from Relationships Australia National Office over the past eight years has identified fragmentation as one of the principal barriers in getting the right services to the right people at the right time and at the right dosage. In nearly every submission, we have identified the unwillingness, or inability, of Australian governments to lift the burden of fragmentation from the shoulders of those least equipped to bear it – service users – by improving intra- and inter-governmental collaboration. In legal services and family relationships policy areas, siloes within and between governments have until now proved intractable, despite overwhelming evidence that fragmentation causes its own harms, compounding the harms and trauma which led people to seek help in the first place.

We have previously welcomed recommendations from the Australian Law Reform Commission, the Joint Select Committee on Australia's Family Law System, the Social Policy and Legal Affairs Committee of the House of Representatives, and as well as the report on the Review of the Family Relationships Services Program that urge better integration of service delivery. More recently, we welcomed the application, by the Productivity Commission, of

...a lens to reforms that will enhance the connections between care sectors and break through the current siloed approach to government decision-making. The fragmented nature of the care economy was a common theme through our engagement. The care economy must be able to respond to our increasingly complex and overlapping care needs, often spanning multiple sectors.

Relationships Australia therefore welcomes Government's acknowledgement that service fragmentation and programme complexity is pushing people into crisis, deterring them from help-seeking, and disrupting access to help when they do reach out.

Contract duration as a condition of flexibility

Relationships Australia **supports** the move to longer contracts. We **recommend** that Government consider contracts of seven to 10 years, particularly in relation to services for people and communities experiencing severe and chronic circumstances of marginalisation, trauma and intergenerational disadvantage. We acknowledge that this will require contracts

to build in robust accountability measures, as well as mechanisms for appropriate indexation of funding.

Realistic funding as a condition of flexibility

Services in this sector have been chronically under-funded, relative to known need (let alone latent need), the complexity of the services, and the professional expertise required to safely and successfully deliver these services. In addition, funding envelopes do not acknowledge the true costs of delivering services:

- in marginalised communities, including regional and remote communities. These costs include practitioner time while travelling (and not engaged in direct service delivery), access to a vehicle, fuel costs, and accommodation expenses.
- after hours - not only men benefit from weekend and 'after hours' services (Consultation Summary, p 4); such offerings, however, are only possible with funding augmented to enable appropriate remuneration for staff working such hours, and
- insurance costs.

Flexibility – but not at the expense of serving cohorts with specialised needs

It is important that, in moving to a more flexible program structure, Government not lose sight of the positive impact of discrete services that have, over time, developed to provide trauma-informed, culturally sensitive and specialist services to cohorts with specific needs. It is analogous to the Government's recognition of the critical importance of ACCOs. Such services include, for example:

- Find and Connect
- Redress services
- adult couple counselling, which has a prevention element in that it not only addresses immediate concerns but also equips clients with skills with which to meet future challenges and nurture their social and emotional wellbeing
- community education programmes
- group work, and
- counselling services to prepare families for Family Dispute Resolution, as administered through the Attorney-General's Department, with its inherent link to the *Family Law Act 1975*, and its specialist focus on the best interests of the child in the context of family separation.

It is our experience that unless such services are formally recognised, albeit within flexible structures, the funding for them disappears into the 'general pot', and becomes unsustainable by services hard-pressed to provide generalist services. Examples include the disability carers program previously provided by Relationships Australia Tasmania, which was folded into FARS and never heard of again, and the Family Relationship Education and Skills Training program.

Does the service or activity you deliver fit within one of the three funding streams?

Relationships Australia's services span all three funding streams, and accordingly, we consider that further detail is needed about how the streams will affect both tendering and contract management.

Are streams fit for purpose for families with complex concurrent needs?

Relationships Australia **supports** Government's attention to universal services that operate at a population level. Our services span all three funding streams; a single family may be receiving from our organisations' services across the three streams concurrently, because they are not experiencing their relationship challenges in a linear fashion. An approach to receive a tertiary service can, through risk screening (eg DOORS) flag an opportunity for prevention (ie through a national information service). This is similar when routine medical screening may flag that a patient is at risk of a serious health issue not related to their presenting issue, offering an opportunity to intervene early, with minimally invasive treatment, while concurrently addressing the presenting need.

To avoid entrenching a new set of siloes, based on the streams, Relationships Australia **recommends** that the structure explicitly recognise that the streams exist in a porous and non-linear relationship, reflecting the complexity and multi-directional intensity of people's needs, circumstances, and therapeutic capacity. Without that porosity, providers will simply face a new set of obstacles to providing holistic, integrated supports to meet families where they are at.

What is the relationship between the streams and funding allocations?

It is unclear from the Discussion Paper whether Government proposes:

- not to allocate specific funding amounts to each stream, or
- to allocate appropriations to particular buckets prior to tendering and, if so, how that will be apportioned, or
- to wait and see what tenders are received for what stream/s and allocate appropriations on the basis of that.

We would be grateful for clarification.

Do the streams allow a single report?

Service providers are often forced to patchwork together bits of funding from various disjointed funding envelopes that exist in functional isolation from each other. For example, a separating family being supported by a Relationships Australia organisation is likely to need multiple services (Carson et al, 2018) – such as couples counselling, individual counselling, Family Dispute Resolution, access to a Children's Contact Service, counselling for children and young people, participation in a Men's Behaviour Change Program and a Parenting Orders Program. In addition, we might also be providing support for harmful gambling or harmful use of alcohol and other drugs (see Family Law Council, 2015 and 2016). To do this lawfully, we must comply with the criteria in multiple sets of grant guidelines and multiple sets of reporting and other governance arrangements. All of this has an opportunity cost in terms of time and resources that could more productively be directed at serving the family.

Relationships Australia **recommends** that streamlining the current programmes, and reporting requirements, should lead to providers reporting only on impact, and against one contract with the Department under the overarching programme (ie not reporting against each 'stream').

Relationships Australia welcomed the Productivity Commission's acknowledgement that inefficient regulatory and reporting requirements divert workers from service delivery and reduces overall productivity. Capacity to provide reports is not a proper proxy for delivering human rights centred, high quality, services. Funding grants, and the grant guidelines supporting them, are currently structured in alignment with bureaucratic divisions, so that one service provider can, in relation to a single family, be administering funding for

overlapping services from numerous government departments, and at different levels of government. This imposes substantial administrative burdens and costs (which are not met through funding envelopes). For example, Relationships Australia South Australia has identified that:

- reporting expectations vary significantly across funders, with one contract requiring 36 reports, another requiring two per annum, compared to an average of 12 reports per contract
- report type (e.g., data, compliance, financial) is entirely funder-driven, requiring bespoke arrangements for each contract
- many reports do not contribute to service quality; instead, they duplicate compliance activities already addressed through service quality standards processes
- funders can unilaterally alter reporting requirements, often without notice, negotiation, or clear rationale
- reporting tends to prioritise scrutiny of administrative processes (eg expenditure and overheads), even though government itself creates much of the overhead burden and constrains efficiency, and
- a lack of standardisation and frequent, short-notice changes create significant inefficiencies; the compliance-heavy focus rather than service outcomes focus is a missed opportunity that diverts resources away from service quality and limits our capacity to invest in innovation.

If having multiple streams will require ongoing multiple reports, then the reforms will not meet their objectives of simplifying and reducing the cost of contract reporting. We welcomed the comment, at the Canberra Town Hall, that multiple reports would constitute a 'mission fail'. A single report would accord with the 'report once, use often' principle articulated by the Productivity Commission.

It is unclear whether the proposed streamlining and flexibility will flow through to genuinely reduce reporting requirements (which should be based on the Productivity Commission's 'report once, use often' principle) and enable providers to use funding in responsive ways to 'wraparound' the clients in front of them. We are concerned that the three streams may prevent funding being taken from more than one stream to respond to the needs of the client.

Relationships Australia **recommends** the development, auspiced by the specialist Secretaries' Board, of a single report, in accordance with the 'report once, use often' principle articulated by the Productivity Commission (2025, p 21).

Do these streams reflect what children and families in your community need now – and what they might need in the future?

Relationships Australia considers that the streams should be supplemented by a recovery and healing stream, and by explicitly referencing the need, across all streams, for services tailored to children and young people.

Recovery and healing

The proposals omit a stream focusing on recovery, repair and healing. This should also include capacity building. It is an odd omission, given the prominence of healing and recovery in the National Plan to End Violence Against Women and Children. Such services are vital for many reasons – including to halt and reverse the risk of exposure to a cascade of medium to long term harms among victim survivors of DFSV. Services that support people

who cause harm to build relational skills, including parenting capacity, should also be included in this stream. Relationships Australia **recommends** that an additional stream, focussing explicitly on recovery, healing and development, be included.

Services tailored to children and young people, accessible by them directly

Relationships Australia further **recommends** that the streams explicitly include reference to services that children and young people can access on their own initiative. This reflects children's status as rights bearers with agency, as well as their status as victim survivors in their own right in the context of DFV. In our outreach and other services in educational settings, children and young people are expressing an urgent appetite for developmentally appropriate information and resources that are tailored to them and the specific relationship challenges they face, and the relational skills they are keen to develop.

Are there other changes we could make to the program to help your organisation or community overcome current challenges?

Nil response.

Prioritising investment

Do you agree that the four priorities listed on page 4 are the right areas for investment to improve outcomes for children and families?

Relationships Australia has concerns about whether the four priorities will fully support achievement of Government policies. These concerns arise from a range of factors, including whole-of-Government parameters and expectations.

Priority 1 Early investment

Relationships Australia's *Relationship Indicators* research provides one of the most contemporary and nuanced portraits of how members of our community experience relational pressures in their daily lives. It highlights the effects of cost-of-living strain, housing instability, mental health challenges, parenting stress, conflict and loneliness on relationship quality and family functioning. These stressors emerge long before crisis, yet they create the conditions in which relational harm, escalating conflict and family violence take hold. The research also shows that many families face substantial barriers to seeking help early, reinforcing the importance of universal supports that promote early engagement without stigma.

AIFS research over the last three years further demonstrates that children's social and emotional wellbeing is inseparable from their family context, whatever that looks like. Parental mental health, parenting practices, family stress and broader social determinants exert significant influence. AIFS has also shown that Australia's family support system continues to be weighted heavily toward tertiary responses, with inquiry recommendations predominantly addressing crisis-level reform rather than early support. This imbalance leaves many families without assistance at the very moments when relational stress begins to accumulate.

Population-level datasets—HILDA, ABS collections, and ANROWS research—reinforce these patterns. Together they document the strong associations between economic pressure, relationship distress, loneliness, housing stress and family safety risks. Family violence and coercive control remain pervasive, and loneliness and social isolation are increasing, particularly among young adults and parents of young children. These indicators

point to the urgent need for a system able to respond earlier and more coherently, rather than only intervening once harm becomes visible.

Promoting social connection and addressing loneliness as a cost-effective and universal prevention intervention across the lifecourse

Loneliness is a complex social problem and a public health concern. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these, and is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life.

As a public health concern, loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease. Loneliness is a precursor to poorer mental health outcomes, including increased suicidality. It is therefore clear that interventions that identify and address loneliness as early as possible decrease the burdens on acute and tertiary health care services, and are far less expensive to undertake. Further, policy, regulatory and service interventions that strengthen connections and reduce isolation are the most promising and fiscally practicable avenues for reducing the risk of abuse and exploitation of people who face structural and systemic barriers to their full participation in society, across the lifecourse. For example, social support has emerged as one of the strongest protective factors identified in studies of abuse and mistreatment of older adults:

....Social support in response to social isolation and poor quality relationships has also been identified as a promising focus of intervention because, unlike some other risk factors (eg disability, cognitive impairment), there is greater potential to improve the negative effects of social isolation.

Relationships Australia is a foundation member of the Ending Loneliness Together network and has, since 2013, been the custodian of Neighbours Every Day, the primary purpose of which is to equip and empower individuals to build sustainable, respectful relationships with those around them. It is a grassroots evidence-based campaign aimed at reducing loneliness by raising awareness and, importantly, providing tools to combat social isolation.

Australia has benefited from accessibility of services that help members of our community to navigate relationship distress, parenting challenges, family and domestic violence, and the predictable pressures that arise across the life course—forming relationships, becoming parents, adjusting to separation, supporting adolescents, caring for ageing parents, managing retirement, and navigating the complexities of re-partnering. Relationship wellbeing underpins population health.

Relationships Australia **recommends** that Priority 1 be refined to explicitly refer to social connection interventions as essential, evidence-backed measures that will promote the Vision and Outcomes (as refined in accordance with our recommendations).

Evaluation and accountability challenges

Relationships Australia strongly supports the Productivity Commission's proposed National Prevention Framework. We agree that

siloes within government, short-term budget and election cycles, and limited evaluations of preventive policies all pose barriers to government funding of prevention.
(Interim Report, p 51)

Relationships Australia brings a public health lens to our work, and acknowledges the compelling evidence that prevention and early intervention can avert catastrophic outcomes. Universally accessible services provide a vital 'soft', non-stigmatising entry into services. We know that cost and stigma deter help-seeking for a wide range of health and social issues. Accordingly, Relationships Australia recommended to the Productivity Commission that its proposed National Prevention Investment Framework should explicitly include support for universally accessible services.

Relationships Australia therefore **supports** maintenance of universal services, which are a critical component of meaningful investment in prevention. However, early investment in this context is a 10 year, not a three year Budget cycle, commitment.

Because of the time scales necessarily involved in measuring these impacts, there will also be attribution issues: many other factors and circumstances, far beyond the parameters of these programmes (including social and economic determinants of health), will come into play with children, families and their communities during these extended time scales.

Consistent and comprehensive biodata will assist, but we are interested to explore further with Government how impact, on these time scales, will be measured and attributed to service interventions.

Further, meaningful investment in prevention and early intervention has been chronically thwarted by the Budget Process Rules, as has most recently been recognised by the Productivity Commission, and pointed out by Relationships Australia across multiple submissions to government inquiries, federal and state. Recommendation 13 of our submission commenting on the Productivity Commission's Interim Report was

That Budget Process Rules not merely allow for, but actively encourage cross-portfolio offsets and downstream savings (or 'second-round effects') (including beyond the Forward Estimates and out years) to be taken into account when considering new policy proposals

Short-term thinking inherent in the BPRs compounds the effects of fragmentation to frustrate services interventions from attaining their full potential impact, the Productivity Commission has advised that Australian governments must commit to maintain momentum in productivity reform activities. It has been our experience that rigid short-term thinking by governments undermines productivity in family and community services sectors in multiple ways, including through:

- BPRs that inhibit:
 - taking into account future savings, creating powerful disincentives to funding prevention initiatives and programs
 - cross-portfolio offsets, artificially constraining service provision in programs such as family and relationships services, including family violence services, administered by the DSS and the Attorney-General's Department, despite the benefits of those services pervading health, justice, and employment/education participation portfolios and leading to budgetary savings in those areas
- addiction to short-term pilots aligned to election and budget cycles, undermining stability and continuity of funding and service provision and disincentivising retention of skilled workers; in our experience, the ability to measure the impact of interventions in short-term pilots is further hindered by premature evaluation and lack of opportunity to make 'in flight' refinements in response to early data, and

- use of short term contracts as a proxy for innovation, accountability and openness to service innovation.

Cross-portfolio action by Government, fully supported and enabled by the central agencies, is needed to remedy this problem.

For this reason, Relationships Australia has **recommended**, in our response to a previous question, that the specialist Secretaries' Board advise Government on necessary reforms, to remove obstacles to investment prevention.

Priority 2 Connected, co-located and integrated services

Leverage similar proposals across Government for maximum impact

Relationships Australia recommends that, in the short term, Government commit to full and phased implementation of the Metcalfe reforms, as previously suggested by Relationships Australia, using FRSP reforms as a roadmap for co-located, connected and integrated multidisciplinary services, as well as a contained 'proving ground' for f-RC (as recommended by Considine et al).

There are clear synergies between the challenges and opportunities identified in the Interim Report from the Productivity Commission, and those identified in the Metcalfe Review. Metcalfe acknowledged the strong track record of providers of services under the program, most of whom are trusted non-profit organisations, and identified challenges to improved service provision, including:

- prevalence of complex needs not in contemplation at the establishment of the FRSP (or, indeed, the FARS), which are addressed through fragmented and disparate jurisdictions and systems (eg concurrent intimate partner violence, mental ill-health, and harmful use of alcohol, drugs and gambling)
- lack of geographic equity, especially in rural, regional and remote areas, and especially for First Nations women
- lack of services tailored for marginalised cohorts (including adolescents)
- inconsistent fee structures
- the limitations of data collection through DEX, and the failure to leverage data that is collected in DEX to drive service improvement and innovation
- lack of access to high quality, authoritative and contemporary information about available services
- duplicative and inefficient data collection
- duplicative and inefficient compliance reporting
- failure to use and share collected data to drive innovations and efficiencies that enhance productivity by improving user outcomes and generating savings in acute and tertiary health, justice, labour market and social services, and
- static baseline funding, inadequate indexation and the gender pay gap.

The Metcalfe Review identifies key opportunities to enhance service provision, including:

- greater flexibility in program structure, including to allow more scope for service integration and innovation
- establishing Family Relationship Centre Hubs which embed funded case management, to lift from service users the burden of dealing with fragmented services and programs
- establishing service hubs for separating or separated First Nations families, delivered by ACCOs

- providing additional services in population growth areas
- more specific outcomes measures, and
- improvements to information sharing within and across governments.

These challenges and opportunities exist equally in the DSS programmes, and families and children as services users (and taxpayers) would maximally benefit from reforms that are aligned across portfolios.

Service design – structural barriers to collaboration

The family and community services sector is replete with examples of effective, stable collaborative relationships that have for many years provided day to day benefits for service users. But these happen in spite of the hostile and mistrustful climate created by competitive tendering processes. Barriers to collaborative commissioning (and other forms of collaboration) in the family and community services sector include:

- the continued reliance on competitive tendering as identifying the most efficient and effective services has fostered distrust and hostility among otherwise complementary services and created strong structural disincentives against effective collaboration, and
- the time and effort to build trustful relationships is not reflected in funding envelopes, or considered an appropriate use of funding; in practice, workers are at capacity to get through each day serving clients; much of the work that goes into building effective collaborative relationships happens in workers' own time and is unpaid.

We **recommend** that Governments should identify and implement means of encouraging efficiency, effectiveness and innovation other than competitive tendering, which has failed to deliver the benefits described by the Industry Commission in 1996, while undermining the capacity of the sector to collaborate effectively.

Thriving collaborations too often depend on the good will and discretionary effort of hard-pressed staff already buckling under their existing client workloads, administrative duties (such as duplicative data collection and compliance reporting that appears to disappear into black boxes in Canberra) and continuing professional development. Given the gendered demographics of the care and support economy, this reliance on unpaid labour further entrenches pay inequity. For collaborative commissioning to meet the objectives identified by the Productivity Commission, funding envelopes must reflect this effort. Accordingly, Relationships Australia recommended to the Productivity Commission that Government review its approach to funding agreements to adequately support collaboration in the care and support economy. (Recommendation 8 of our submission to the Productivity Commission).

Formal relational contracting and collaborative commissioning

Formal Relational Contracting (f-RC) has been recommended as an essential first step toward successfully implementing collaborative commissioning arrangements.

Relationships Australia is interested in exploring further how collaborative commissioning, as canvassed in the Productivity Commission's 2025 Interim Report, would align with Government's expectations of f-RC.

Relationships Australia has previously advised DSS, the Attorney-General's Department and, most recently, the Productivity Commission, that competitive tendering is inimical to service collaboration. To support f-RC and collaborative commissioning, Relationships

Australia **recommends** that Government identify and employ alternatives to competitive tendering allow services to feel secure to engage in durable, trusting and transparent relationships

Priority 3 Informed by community needs

Centring community voices

Top-down approaches to identifying community needs and designing, delivering and evaluating services to meet those needs have failed. For this reason, Relationships Australia takes as a framing principle centring lived experience (including through authentic co-design) in policy and service design. This supports the development of policy, legislation and services that uphold human rights – especially human rights of individuals and groups who have traditionally been marginalised and excluded from policy discourse. In addition, centring lived experience can enhance the transparency and public accountability in policy and programme development, and the efficiency of government services, by supporting the delivery of outcomes that are valued by those who are intended to use and benefit from the services, not just administrators and service providers.

In view of this framing principle, Relationships Australia is concerned about the timeframes around this consultation and the implementation of the proposals canvassed in it. Previous consultations around reforms of this service, which are identified in the Discussion Paper, have typically occurred across very compressed timelines, generally over the Christmas/New Year period, which is an extremely busy one for this sector. It is well-documented that this is a period when families are under particular stresses and strains, and need for services spikes. Requiring the sector to engage on high impact reform proposals at this time, repeatedly over the last six years, has inevitably limited the capacity of diverse service users and providers to afford Government the benefit of being adequately informed of their perspectives.

This is especially true for small and hyper-localised providers, whose views are of vital importance.

Further, the proposed timeline for implementing the proposals will not accommodate authentic co-design and incorporation of lived experience perspectives, especially with priority cohorts. It is also concerning that the report of the recent evaluation of FARS and SFVS, which providers diverted resources to participate in, has not been made public to inform our consideration of the proposals. A literature review, which canvasses the evidence base informing the evaluation, should be published. The modelling phase, which could be crucial in informing Government and the sector about unmet and latent need, is still underway. The evaluation, the literature review and the modelling are all key to enabling the sector capacity to respond as usefully as possible to the questions raised in the Discussion Paper. The sector's lack of access to these resources is out of alignment with the Discussion Paper's proposals for relationships of deep trust and transparency between the Department and the sector.

Universal access to services that respond to intersectionality and marginalisation

Relationships Australia is committed to universal accessibility of services, as well as inclusive and culturally safe services. Our clients (and staff) experience stigma,

marginalisation and exclusion arising from diverse circumstances and positionalities, including:

- 'postcode injustice' in accessing health, justice and community services that are of consistent standards of quality and safety, regardless of location
- poverty
- status as users of care and support
- being an adult informal carer for a child or other adult
- being a young person caring for a child or an adult
- disability and longstanding health restrictions (including poor mental health)
- intimate partner violence, abuse or neglect as an older adult, and/or child maltreatment
- family separation
- housing insecurity and instability
- employment precarity, unemployment and under-employment
- misuse of alcohol and other drugs, or experience of gambling harms
- people who come from culturally and linguistically marginalised backgrounds (including people who have chosen to migrate and people who have sought refuge)
- people affected by complex grief and trauma, intergenerational trauma, intersecting disadvantage and polyvictimisation
- survivors of institutional abuse
- people experiencing homelessness or housing precarity
- people who identify as members of the LGBTIQ+ communities, and
- younger and older people.

None of these circumstances, experiences and positionalities exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and
- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Government partnering with services to share data

Relationships Australia **recommends** that Government share service mapping, and the modelling currently being carried out by Allen + Clarke Consulting, with the sector to enable us to plan, to be more agile and responsive to changes in the communities we serve; the Digital Atlas is a good precedent and could be further developed to provide bespoke intelligence to this sector.

Priority 4 *ACCOs*

Framing principles

The commitment of Relationships Australia to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing. Of acute importance is a commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people as foundational to policy and

programme development, as well as service delivery. Connection to Country, and the context-specific experiences of kinship, for example, do not countenance the hyper-individualism that pervades Western assumptions about distribution of resources and obligations between the Western nation-state and individuals, among individuals and within communities.

Centring the epistemologies and experiences of Aboriginal and Torres Strait Islander people is a necessary (although not of course sufficient) step in achieving the targets in the National Agreement on Closing the Gap. Commitment to this principle will remain critical to the Relationships Australia federation, because we remain committed to serving and employing First Nations people, and supporting First Nations leaders, across our services and throughout the sector, as invited to do so.

Choice

First Nations families and children must continue to have a choice of providers, as do other members of our community. Removal of that choice may inhibit help-seeking from First Nations people who might not have access to, or wish to have access to, an ACCO for reasons including conflicts of interest in a local ACCO or that they would experience shame in telling their story to another First Nations person (this has arisen, for example, in some of our DSS funded Redress services). Other members of our community are allowed choice in their provider; why should this choice be removed from First Nations people?

Accordingly, Relationships Australia is committed to serving any Aboriginal and Torres Strait Islander people, families and communities who approach us, and to providing culturally safe services, informed by our much-valued First Nations leadership and delivered by our proud, highly skilled First Nations workers. We are committed to supporting Aboriginal and Torres Strait Islander leadership beyond the Relationships Australia federation in the design, delivery and evaluation of services. Accordingly, Relationships Australia recommended to the Productivity Commission that all service providers be required to ensure that their services, service outlets and workers are culturally safe, so that First Nations people have choice about whether to go to an ACCO service or another service, and are culturally safe regardless of their choice. (Recommendation 11 of our submission to the Productivity Commission).

More broadly, a new program should also concern itself with how providers other than ACCOs serve First Nations people. Relationships Australia **recommends** that the program makes clear that providers other than ACCOs continue to bear a responsibility to provide culturally safe services and to be culturally safe employers. If all providers bear these responsibilities, then geographic equity is supported and cultural safety is not a matter of 'postcode lottery'.

Relationships Australia is also committed to enhancing the cultural responsiveness of our services to other culturally and linguistically marginalised individuals, families and communities. We are concerned by the lack of attention, in the Discussion Paper, to the marginalisation and stigma experienced by these communities. We **recommend** that the Vision, Outcomes, and investment priorities be refined to elevate recognition of CALM communities, and support investment in culturally safe services for culturally and linguistically marginalised families and children.

Impact of timeframes on engagement with First Nations communities and providers

Increasing the number of ACCOs is important, and increasing the diversity, professionalisation and sustainability of ACCOs is even more important still. The latter goal

requires - as a necessary but not sufficient prerequisite - meaningful engagement, over time, with First Nations communities to adequately inform program design, service delivery and evaluation frameworks. It is crucial that Government avoid past mistakes in implementing reforms without first having built relationships of trust nurtured and sustained, over time, through dadirri, and meaningful co-design.

This is not possible within the timeframe contemplated by Government, which should take as much time in engaging with First Nations communities, and the ACCOs serving them, as those communities wish. Compressed timeframes contribute to the well-deserved distrust and cynicism that First Nations communities have about White policy-making and White-imposed time scales on relationship-building. The proposed consultation and implementation timeframes are not relational and are not trauma-informed.

Are there any other priorities or issues you think the department should be focussing on?

See answers above.

Improving family wellbeing

Do the proposed focus areas – like supporting families at risk of child protection involvement and young parents – match the needs or priorities of your service?

Relationships Australia is concerned that the proposed focus areas (like the Vision and Outcomes) reflect outdated and exclusionary interpretations of contemporary families, and **recommends** that the focus areas be refined to better reflect the following circumstances and considerations.

First, the focus areas should explicitly incorporate a whole of lifecourse approach to family wellbeing, and the significance of key lifecourse transitions. The focus areas should acknowledge how these can be leveraged to maximise investment in prevention and early intervention, while also reflecting non-linear experiences of encountering and overcoming relational distress through building relational skills and capacities.

Second, the focus areas should acknowledge the complexity of prevention. Prevention is not simply about avoiding the emergence of problems; it is equally relevant to how crisis and intensive supports are designed and delivered. When approached holistically, moments of crisis can serve as catalysts for learning, healing, and development, when people can be most open to change; poorly integrated or issue-specific responses, by contrast, risk entrenching service dependency and compounding relational harm. Conversely, early relational stress, if unaddressed, solidifies into long-term harm and intergenerational disadvantage.

Third, the focus areas should acknowledge the impact of intergenerational trauma and patterns of relational distress, conflict and violence. Children in families experiencing sustained parental disadvantage exhibit significantly higher developmental vulnerabilities at school entry. Young people leaving out-of-home care have markedly poorer educational and employment outcomes, higher reliance on income support and earlier contact with justice and health systems. Intergenerational analyses show that parents' own childhood disadvantage predicts poorer outcomes for their children even after adjusting for current income. This evidence demonstrates how relational stress, economic adversity and

fragmented service responses compound across generations, and how difficult it is to reverse these pathways once established.

Finally, the Discussion Paper does not articulate Government's conceptualisation of how the proposed new DSS-administered program will interact (in service design, footprint, delivery and evaluation) with adjacent programs and systems, both within the Commonwealth and those within the span of control of states and territories. Particularly critical is consideration of:

- early education
- health and disability services (including the new Thriving Kids initiative)
- child protection and out of home care
- child justice systems
- family law systems.

A comprehensive understanding, shared with the sector, of these multi-directional relationships is a precondition of achieving the Government's Vision.

Are there other groups in your community, or different approaches, that you think the department should consider to better support family wellbeing?

Family wellbeing derives from the wellbeing of the whole family – not just the 'nuclear' elements of parent/primary caregiver and children. Consistent with earlier responses, Relationships Australia **recommends** that the Government adopt an intergenerational and culturally sensitive lens to family wellbeing, that better reflects the lived experience of family wellbeing, and the powerful influence of intergenerational patterns of wellbeing – and of conflict, violence and relational strain.

Connected, co-located, and integrated services

What are other effective ways, beyond co-location, that you've seen work well to connect and coordinate services for families?

(See our answer to Priority 2, above)

The capacity to provide connected, integrated services to wrap around clients with complex co-occurring challenges is not dependent on co-location, although the evidence base supporting the positive impact of co-location on client outcomes is well-established across many countries and service systems. It is important, however, that co-location does not come at the cost of serving small communities or small cohorts, or by sacrificing specialist expertise and services. Otherwise, people are at risk of ending up in the mental health and criminal justice systems. What matters is that clients derive the benefits of 'no wrong door', multi-disciplinary services and that, as far as practicable, logistical barriers to help-seeking are dismantled.

Hubs may be physical, virtual, and hybrid. They can emerge from a strong and durable web of intentionally established and sustained professional and community relationships. Approaches that foster seamless multi-disciplinary service delivery include:

- the well-established Family Law Pathways Networks, funded by the Attorney-General's Department – these have consistently been evaluated as cost-effective ways to nurture relationships across a broad range of occupations, disciplines and community roles

- Social Connector roles (as, for example, established by Relationships Australia Victoria)
- formal collaborative protocols for clear communication, role clarity, and integrated care pathways
- embedding and ‘inposting’ of workers and online service points in places where people naturally congregate and may be seeking other advice or support – eg schools, hospitals, other health care service points and aged care homes, respite centres, neighbourhood centres, and prisons, and
- ‘travelling services’ can be suitable as touchpoints for developing and nurturing relationships, as well as for direct service provision.

However, strong and durable relationships require time, effort and resources. For too long, the good will and professionalism of a gendered workforce has been taken for granted to identify opportunities for collaboration, and to sustain them through adequate investment. Another system vulnerability is when the initiative and capacity to expend this kind of effort resides in a single motivated individual, or small group of individuals, and resourcing has limited the extent to which collaboration can become self-sustaining and embedded in institutions, independent of the presence of particular workers.

To achieve its ambitions for a connected, integrated and collaborative sector, Government must not only dispense with competitive tendering, but also resource collaboration as an ongoing and embedded practice in the sector. Relationships Australia **recommends** that, as has been done (albeit very modestly) with Family Law Pathways Networks, Government allocate specific resourcing to give providers the time and capacity to initiate, sustain and grow the collaborative relationships that are a precondition of integrated, enduring and multi-disciplinary service delivery.

What would you highlight in a grant application to demonstrate a service is connected to the community it serves?

Connection to community depends on trust. Trust always takes time and (what has been chronically unfunded) consistent efforts over time. In particular, trust among cohorts that have experienced persistent exclusion, marginalisation, exploitation and abuse does not emerge from short-term pilots or other sporadic engagement and service delivery effort. Relationships Australia **recommends** that the grant process:

- accommodate the possibility that services will tender to provide services in locations that the (as yet incomplete) modelling being undertaken by Allen + Clarke Consulting identifies communities as ‘service deserts’
- seek to identify ways in which services have engaged with communities, without being overly prescriptive, and weight them accordingly; in doing so, the process must also acknowledge the resourcing constraints that have limited many service providers in when and how they have engaged; for example, while expecting providers to engage in outreach activities, not limited to direct service provision, funding envelopes have not taken into account the real costs involved in these activities
- acknowledging such previous limitations – ask tenderers to identify what resources they would need to consistently engage, over the medium to long term, and what actions and activities they would undertake, if given the opportunity.

What should applicants be assessed on?

A comprehensive response to this question is necessarily dependent on how Government refines the Vision and other elements of the reformed program in response to this consultation. Organisations would also be better equipped to provide practical responses which are helpful to Government if they had access to:

- the report of the FARS/SFVS programs
- the Allen +Clarke modelling
- the literature review, and
- insights from DEX data collected from providers over the past decade, but not shared publicly, or even with the organisations which provide the data.

With the limited information made available to us, Relationships Australia **recommends** that the following principles be adopted in designing the assessment:

- cultural safety
- maximum transparency to establish the necessary foundations for relational contracting, including by giving notice to tenderers of:
 - the weight to be accorded to each assessment criterion
 - the data sets being used by Government to identify need and trajectories
 - the factors, other than locational disadvantage (see also the response to the following question), being taken into account; and information about how each factor will be taken into account
 - whether and how AI will be used in the assessment process
- adequate time is allowed for a diverse range of providers (including smaller providers with fewer resources to develop tenders) to fully engage with the tender process
- without being prescriptive about the form of evidence provided - demonstrated commitment, over a significant period of time, to:
 - providing culturally safe, trauma-informed, person-centred and child-centred services to people experiencing intersectionality of disadvantage and marginalisation
 - measuring durable and positive impact on clients
 - working collaboratively with communities and with other organisations within those communities (whether those organisations are providing related or unrelated services), and
 - innovation in service provision and community engagement.

Responding to community need

Beyond locational disadvantage, what other factors should the department consider to make sure funding reflects the needs of communities?

Relationships Australia considers that Government should consider the following additional factors.

First, funding to support the programmes under consideration has been chronically inadequate, and that inadequacy has been compounded by disrupted and insufficient indexation, as well as exacerbation, since the COVID-19 lockdowns, of the multiple complex needs with which clients of the programmes are presenting to us. Relationships Australia **recommends** that the funding for a new programme must reflect the prevalence, intensity and complexity of the challenges facing children and families.

Second, Relationships Australia **recommends** that the Department actively seek, over the timeframe we have proposed above, the voices of communities – especially communities which have experienced chronic marginalisation, independent of locational disadvantage. These include, for example:

- status as users of care and support
- being an adult informal carer for a child or other adult
- being a young person caring for a child or an adult
- disability and longstanding health restrictions (including poor mental health)
- intimate partner violence, abuse or neglect as an older adult, and/or child maltreatment
- family separation
- housing insecurity and instability
- employment precarity, unemployment and under-employment
- misuse of alcohol and other drugs, or experience of gambling harms
- people who come from culturally and linguistically marginalised backgrounds (including people who have chosen to migrate and people who have sought refuge)
- people affected by complex grief and trauma, intergenerational trauma, intersecting disadvantage and polyvictimisation
- survivors of institutional abuse
- people experiencing homelessness or housing precarity
- low literacy
- digital exclusion
- people who identify as members of the LGBTIQ+ communities, and
- younger and older people.

Third, over the past decade, DSS has had privileged access (which it has not shared with the sector) to data that should enable it (and other Government departments) to have a rich and textured understanding of need, including latent need. We **recommend** that:

- the grant documents identify what data sets Government is using for the grant process, and
- the modelling currently being undertaken by Allen + Clarke Consulting be shared not only with providers, but with the public and researchers, to maximise the breadth and depth of analysis of available data.

What's the best way for organisations to show in grant applications, that their service is genuinely meeting the needs of the community?

To ensure a fair, transparent and culturally safe grant process, Relationships Australia **recommends** that the Department avoid being prescriptive in how organisations demonstrate this.

Improving outcomes for Aboriginal and Torres Strait Islander children and families

Please see our response and comments on Investment Priority 4.

How could the grant process be designed to support and increase the number of ACCOs delivering services to children and families?

Please see our response and comments on Investment Priority 4.

What else should be built into the program design to help improve outcomes for Aboriginal and Torres Strait Islander children and families?

Please see our response and comments on Investment Priority 4.

Measuring outcomes

The cost-effectiveness of the family-based supports within the existing programmes remains under-recognised. The contribution of poor family functioning to acute mental health episodes, crisis presentations across the health and legal systems, and long-term service use is significant, yet insufficiently researched or reflected in policy and funding decisions. A stronger evidence base on the economic and social benefits of relationally oriented programs would reinforce the value of investing early in family capability and connectedness, rather than absorbing the far greater downstream costs associated with untreated relational distress.

Relationships Australia notes, from the Town Hall discussions in Canberra, that the Department acknowledges that DEX needs reform to realise its potential (and meet public expectations). Relationships Australia **recommends** that, consistent with the f-RC approaches being proposed, this occur in close and open partnership with the sector and with lived experience. Deciding what outcomes matter is not uniquely within the capability of officials or providers; rather, it is the central concern of those whom we serve.

As noted in our comments about proposed Investment Priority 1, the time scales necessarily involved in measuring outcomes of the kinds described in the Discussion Paper mean that there will also be attribution issues. The specified outcomes will only be evident over many years, often well beyond the period of engagement with services or contract duration. Many other factors and circumstances, far beyond the parameters of these programmes (including social and economic determinants of health), will come into play with children, families and their communities during these extended time scales.

Consistent and comprehensive biodata will assist, but we are interested to explore further with Government how impact, on these time scales, will be measured and attributed to service interventions. Outcomes measurement will need to consider, for example, identify any impact that these programmes have on:

- acute mental health admissions
- waiting lists for mental health services
- child engagement with child justice systems
- DFSV prevalence, including prevalence of abuse and mistreatment of older adults
- intergenerational welfare and service dependency
- notice of risk filings in family law courts.

Relationships Australia **recommends** that, before going out to tender, Government publicly and explicitly articulate how it expects successful tenderers to demonstrate impact and achievement of outcomes over these timeframes.

What types of data would help your organisation better understand its impact and continuously improve its services?

Relationships Australia welcomes the opportunity for an ongoing discussion about data needs.

As stated in previous consultations with DSS, AGD and in submissions to other inquiries, Relationships Australia would welcome timely and open access to DEX data and Government analysis of DEX data provided by our organisations. Relationships Australia **recommends** that reporting frameworks and data repositories be designed and developed with partnership between governments, providers, service users and researchers at the centre (see Recommendation 4 of our submission to the Productivity Commission). To promote transparency and accountability, support user choice, and to drive evidence-based innovation, data should be collected with discernment and published as broadly as possible.

The 'black box' data collection and holding practices that were exposed in the Royal Commission into Aged Care Quality and Safety – and that characterise engagement with DEX - should be shelved as relics of poor stewardship practices. Governments must lead by example in data-sharing; this should not only be a requirement for service providers. For this reason, too, it would be desirable to describe data collection systems not as passive repositories into which data is fed, never to be seen again, but in ways that reflect that the point of data collection about taxpayer funded services is to measure demand, ensure accountability and quality, and drive service improvement and innovation. Data collection is not an end in itself. Relationships Australia supports the Productivity Commission's draft recommendation that

The Australian Government should pursue greater alignment in quality and safety regulation of the care economy to improve efficiency and outcomes for care users.'

What kinds of data or information would be most valuable for you to share, to show how your service is positively impacting children and families?

Relationships Australia organisations publish impact reports on their websites. The Relationships Australia federation publishes a national impact report. The impact report for 2023-2024 is available at <https://www.relationships.org.au/wp-content/uploads/RA-Impact-Report-24-FINAL.pdf>, and the 2024-2025 report is expected to go live shortly.

In addition, several of our organisations use DOORS to develop insights into the impact of our services at various levels of granularity, and to inform refinement and innovation of our services. Other Relationships Australia organisations take different approaches to collecting, analysing and acting on data, and ensuring that our focus is sharply on what difference our services make to people, in their capacities to develop and nourish meaningful relationships.

For example, in 2024, Relationships Australia Victoria received the Excellence in Social Impact Measurement Award in 2024 for demonstrating the value of family dispute resolution services. RAV measures the impact of Parenting with Confidence and Connection using the Parent Empowerment and Efficacy Measure (PEEM), showing significant improvements in parenting confidence and connection, and has also evaluated its Men's Behaviour Change

Programs (MBCP). A pre- and post-program survey measured shifts in attitudes towards violence, and found that 88.6% of participants rejected victim-blaming by the end of the program. The Relationships Australia federation has partnered with AIFS to undertake an evaluation of MBCPs offered across the federation; this work is currently underway.

If your organisation currently reports in the Data Exchange (DEX), what SCORE Circumstances domain is most relevant to the service you deliver?

The answer to this depends on which service.

DSS has indicated the DEX is 'due for a refresh' and suggests that future reforms to DEX will equip Government with better understanding of the cumulative impact of programmes. Making DEX more comprehensive and meaningful is wasted effort if it does not live up to the 'exchange' part of its title and remains a rigid black box. DEX data, and Government's analysis and interpretation of that data, needs to be openly shared with providers, in an authentic partnership, to most effectively harness the agility and innovation already embedded in the sector (as demonstrated by its pivots during COVID lockdowns).

Chronically under-funded not for profit service providers are necessarily experts in making a little go a long way in their communities. They do not survive if they are not intentionally agile. To optimise leverage of that agility across the sector, Relationships Australia **recommends** that DEX become a genuine resource not just for Government, but also for providers, researchers and the general public, which has the largest stake in the success of these programs.

What kinds of templates or guidance would help you prepare strong case studies that show the impact of your service?

Relationships Australia **recommends** that Government be transparent in its expectations, including by being clear about the kinds of impact it values, and the kinds of evidence it will accord weight to in assessing that impact, and how it will solve attribution challenges.

Relationships Australia has reservations about the indication that DSS will be engaging providers to be involved in media releases about 'success stories'. This raises questions about ethics, privacy and inappropriate politicisation of service providers. We look forward to working with Government to ensure that success stories can be told in a compelling way that mitigates these risks.

Working together

What does a relational contracting approach mean to you in practice?

For decades, the frameworks for contracts with the federal Government have been explicitly transactional, although on a day to day basis, more relational approaches have developed organically with individual managers. This necessarily limits our capacity to respond to this question, since formal, explicit relational contracting as the source of rights and obligations remains in the realm of the speculative, rather than being a practical reality. The same is true of the APS as the funder and administrator of contracts on behalf of Government which, for decades, has worked within transactional contracting frameworks, embedded in both regulation and public expectations of accountability.

Nonetheless, Relationships Australia welcomes Government's consideration of formal relational contracting (f-RC). A vivid example of how shifts from transactional contracting

can work in practice was evident in the approaches of DSS and the Attorney-General Department as lockdowns took hold, in different ways, across Australia from the outset of the COVID-19 pandemic. Contract administrators and providers pivoted quickly to make sensible, pragmatic judgements without compromising on performance, accountability, stewardship and, of course, uninterrupted service delivery to families experiencing circumstances and stressors new to the current generations. A condition precedent of the success of this pivot was, undoubtedly, pre-existing relationships of trust that had built up over years of working together for shared purposes.

We also strongly support the Productivity Commission's recommendations to reform contracting paradigms with the not-for-profit sector. The Commission has made clear that short-term contracts, transactional contract oversight, underfunding of true delivery costs, and excessive reporting obligations are unsustainable and not fit for purpose.

Relationships Australia is concerned about unintended consequences, including disruptions to service delivery, if a culture of f-RC is not successfully and sustainably embedded across Government before implementation. Ideally, f-RC would have cross-party political support as the framework within which the Commonwealth deals with providers of family and community services. Were Government policy to revert at a later date to a transactional approach, for whatever reason, families and children would be exposed to a very high level of risk of service disruption.

Elements of a successful f-RC transformation

Relationships Australia considers that preconditions of successful transition to f-RC include:

- culture change in central agencies and line departments; this will take time to achieve
- increase in staffing capacity to be more intensively engaged in nurturing relationships with diverse service providers, which we are concerned may not be possible within Budget constraints
- professional development equipping officials and providers with the skills to make f-RC a success, and
- nurturing of relationships of trust between the Government and providers – including potential new providers; this too takes time, and
- mitigating long-institutionalised asymmetries of power and information between Government and providers, especially smaller providers and new providers.

Establishing these preconditions will take time. This is one of the reasons for Relationships Australia recommending a short extension of the timeframes indicated in the Discussion Paper. Consistent with research undertaken by Considine et al, Relationships Australia recommends a phased transition plan, piloting the f-RC model through full implementation of Recommendation 4 of the Metcalfe Report and up-front investment in governance infrastructure and staff cultural change.

To maximise the success of f-RC (to the benefit of clients, providers and Government) across a sector which comprises providers of diverse sizes and access to resources, Relationships Australia further **recommends** that Government invest in professional development, capability, cultural change and staffing across both the APS and providers, including by sharing training resources with organisations. This kind of 'training in partnership' would best leverage Government's spend on upskilling its own staff, while ensuring that the sector and the public service contract managers are receiving the same messages about 'how to do' f-RC.

Elements of a successful f-RC transformation – the evolving role of FAMs

FAMs need to be deeply knowledgeable about the programs they oversee. Historically, there has been huge variability in terms of knowledge, skill and approach to the role. Relationships Australia organisations are concerned that there will be higher administration and compliance thresholds to clear as FAMs get up to speed with f-RC practices. To support the transition to f-RC, Relationships Australia **recommends** that the role of FAMs be re-defined in ways that encourage FAMs to take a relational, rather than transactional, approach.

Limitations and risks – flaws of a free market approach in community service delivery: competitive tendering does not support f-RC and collaborative commissioning

As noted in Relationships Australia's comments on Priority 1, competitive tendering, a longstanding and inherent consequence of adherence by successive governments to a free market approach, is a structural disincentive to collaboration across the sector. To give f-RC the best chance of enduring success, as well as to better support multi-disciplinary service delivery, Relationships Australia has recommended that Government move away from competitive tendering.

Relationships Australia considers that discarding the use of competitive tendering in this sector is a necessary (but not sufficient) prerequisite to reaping the intended benefits to clients (and taxpayers) of streamlining service delivery and authentic and durable collaboration. As recognised by King, 2025, experience has shown that there are serious limitations to ensuring that human services delivered within a competitive market meet even minimum standards of quality and safety. These include:

- Australia's geographic and demographic characteristics, which entrench problems of thin markets
- governments' reluctance or inability to take up their responsibilities as effective system stewards; by, for example:
 - poor market design, including market design that creates opportunities for corruption, exploitation of service users and fraud on the taxpayer, and
 - failing to make usable and useful information available to service users, service providers (and researchers), which is a prerequisite of enabling informed choices by service users and driving improvement and innovation among providers (a chronic issue with DEX), and
- health and wellbeing barriers to exercising of user choice between possible providers. For example, entry into services often occurs at times of great stress, impairing the emotional readiness to make effective choices.

There were early messages of caution in implementing free market principles in the human services sector, including from the 1993 Gregory Review of aged care. This caution has been amply vindicated, as Royal Commissions into aged care and disability services have shown. Yet reforms to the delivery and funding of human services continue to be 'market-focused', aimed at positioning human services as sold and purchased in a free and competitive market, bargained for between vendors and purchasers with parity of information and power, rather than as essential social services often accessed at times of immense stress between parties in relationships of yawning asymmetries of information and power. In the case of these programmes, there is an additional asymmetry of information and power: between Government and predominantly not for profit providers.

What criteria would you like to see included in a relational contract?

Relational contracts for these services will need to include very clear articulation of shared intent and expected outcomes. What is more important is sector confidence that Government is fully committed to shifting from transactional to relational contracts for the long term; this is best achieved through ensuring cross-party political support and full support from the central agencies.

What's the best way for the department to decide which organisations should be offered a relational contract?

Relationships Australia considers that a genuinely relational contract should emerge from shared intent, rather than being decided on, unilaterally. The Department has many years of experience in serving the community and working with the sector, and it should draw on that experience to identify:

- communities and cohorts that would most benefit from the impact of relational contracts, and
- providers which have the resources to invest in developing and maintaining contractual relationships with the Department, and to adapt to changing circumstances while maintaining accountability for outcomes.

Is your organisation interested in a relational contracting approach? Why/why not?

In principle, yes. As observed in previous responses, Relationships Australia has, over many years, engaged in *de facto* relational contracting with DSS and the Attorney-General's Department, demonstrating that we invest in developing and maintaining relationships with the Department, and adapt readily to changing circumstances while maintaining accountability for outcomes. Our experiences with these Departments during the COVID-19 lockdowns evidence strong potential for formal relational contracting in more 'normal' times.

Other

Is there anything else you think the department should understand or consider about this proposed approach?

AI-powered service delivery

Relationships Australia **recommends** that, in ensuring a consistent approach to the use of artificial intelligence across sectors delivering family and children's services, the Commonwealth must centre human rights and ethics. Application of AI in these sectors must not be viewed through merely technocratic or regulatory practice lenses. There is the potential for great harm to service users (and workers) if governments do not build human rights and ethical dimensions into the use of AI from the outset. We have seen, in social media, how difficult it is to retrofit quality, safety, and human rights into the borderless landscape of the internet.

Further, having regard to Relationships Australia's framing principle of sound intergenerational stewardship, use of generative AI (even the use of basic large language models) cannot be considered in isolation from its environmental impact. The adverse health consequences are increasingly recognised, and are likely to become increasingly severe. The use of AI with the intention of improving health and wellbeing outcomes should not be

permitted to have the inadvertent consequence of inflicting widescale ill-health. We therefore recommended that the Productivity Commission advise governments to incorporate consideration of environmental (and subsequent public health) impacts of the use of AI.

Conclusion

As previously stated, Relationships Australia is excited by the opportunities, proposed in the Discussion Paper, to undertake a once in a generational transformation of how families and children are supported and equipped to navigate relationship challenges, including relational distress and conflict throughout the lifecourse, while exercising prudent stewardship of taxpayer resources.

We look forward to working with Ministerial Offices and officials to realise the ambitions canvassed in the proposals. Families and children should not have to wait for services that are enabled to be more responsive, flexible and accessible, and recent progress towards reform has been halting at best. We want to see service design, delivery, accountability and evaluation transformation be fully embedded in how the Commonwealth plays its role in achieving outcomes for children, families and communities.

However, the scale of opportunity represented in these proposals is substantial. Moving from the current configuration to a genuinely integrated, prevention-oriented model—one that embeds collaboration, relational contracting and service delivery, and prevention principles - represents a major transformation in practice, mindset and system design.

With a short extension in the timeframes proposed in the Discussion Paper, to allow a once in a generation confluence of circumstance to be leveraged to its maximum potential, Relationships Australia is confident that a sustainable transformation can be achieved.

Thank you again for the opportunity to comment on the Discussion Paper. A full set of references for the research and examples provided in our answers is available on request.

We look forward to working with Government to ensure Australia's families are supported to thrive, as well as achieving the objectives identified in other key Government strategies and plans relating to the safety and wellbeing of children and families. Should you wish to discuss this submission further, please do not hesitate to contact me at ntebbey@relationships.org.au or our National Policy Manager, Dr Susan Cochrane, at scochrane@relationships.org.au.

Kind regards



Nick Tebbey
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