

10 March 2016

Reportable Conduct Submission Chair
Policy and Cabinet Division
Chief Minister, Treasury and Economic Development Directorate
PO Box 158
Canberra ACT 2601

Dear Sir

Carers ACT welcomes this opportunity to provide feedback on the *Reportable Conduct Scheme for the ACT Discussion Paper*. Under the proposed Scheme Carers ACT would be a 'designated agency' and responsible for complying with the proposed Reportable Conduct Scheme because of the services it provides to children and young people through diverse programs. These include:

- respite (including out of home residential care) for children and young people with disability
- other services for young people with disability – friendship club, after school program, hospitality training
- services for young carers – counselling, support groups, social activities, information and referral to support services. Young carers are children and young people caring for a family member or friend who has a disability, chronic condition, mental illness, alcohol or drug dependency issue or who is frail aged
- an advocacy service for kinship and foster carers in the ACT.

These services are delivered by Carers ACT employees, and from time-to-time volunteers assist with some activities.

Clients of a designated agency e.g a parent of a child because there is no appropriate connection between the individual and the agency. This does not alter any existing reporting obligations, such as reporting of a criminal offence to police or Community Services Directorate.

Carers ACT Comments

Carers ACT supports the direction of the proposed Reportable Conduct Scheme outlined in the Discussion Paper, particularly:

Supporting Family Carers

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Commonwealth Respite and Carelink Centre 1800 052 222* **Carer Advisory Service** 1800 242 636*

- Its similarity to the reportable conduct scheme operating in the NSW, which is also being considered by Victoria and as a national model by the Royal Commission into Institutional Response to Child Sexual Abuse. This would assist designated agencies with the implementation of the proposed Reportable Conduct Scheme in the ACT and minimise the need different policies and procedures in different jurisdictions.
- The definition of reportable conduct in the ACT outlined on page 8.
- The type of conduct that would not be defined as reportable conduct outlined on page 8.
- The responsibility of the oversight body to develop guidelines and benchmarks and resources for agencies about responding to and investigating allegations – including standard of proof, ensuring natural justice for the person, ensuring the safety of the child and other related matters and other functions outlined on page 12.

While Carers ACT acknowledges the key purpose of the proposed Reportable Conduct Scheme is to “... assist organisations to respond correctly and appropriately to allegations of child abuse or neglect ...”it is concerned that the reportable conduct process and interaction between designated agencies and the oversight body is not too arduous, it includes timely responses from the oversight body to designated agencies, and there is a mechanism to identify and address barriers that arise so that instances of suspected reportable conduct are not ignored or hidden by designated agencies....”

Carers ACT also recommends that:

- The ACT Government invests in providing resources (e.g advice, reporting templates, employee training) and funding for staffing resources to designated agencies so they can smoothly implement the proposed Reportable Conduct Scheme in their organisation.

The resources should also include an online portal, similar to that on the NSW Ombudsman website (see <https://www.ombo.nsw.gov.au/what-we-do/our-work/employment-related-child-protection>)

About Carers ACT

Carers ACT is a non-profit, community-based, company limited organisation. It is governed by a Board of Directors and has a mandate to represent the voices of carers to government and the wider community. It is committed to improving the lives of carers so they enjoy improved health, wellbeing, resilience and financial security. Carers ACT is a member of the National Network of Carers Associations.

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Carers ACT has delivered direct carer support services and carer referrals to aged and disability services for over 20 years. It also auspices the ACT and SE NSW Commonwealth Carer and Respite Centres. During 2014-15 we supported 5,058 caring families.

For further information about this response please contact Colleen Sheen, Senior Policy Advisor by email colleen.sheen@carersact.org.au or phone 6296 9935.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dee McGrath', with a stylized flourish at the end.

Dee McGrath
CEO Carers ACT

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