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Department of Health and Human Services
Office of the Secretary
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24 October 2008

Dear Anne Horner,

TasCOSS response to the draft of the *Children, Young Persons and Their Families Amendment Bill 2008*

TasCOSS welcomes the opportunity to comment on the draft of the *Children, Young Persons and Their Families Amendment Bill 2008*.

Unfortunately the short time frame provided from the Department for comment on the bill was not adequate to enable our members to give proper consideration to the changes proposed. In particular the Family Support Services Association (FSSA) were concerned that there had been no prior discussion in relation to these proposed changes and that this timeframe did not allow time for other organisations to consult with their members.

TasCOSS would like to highlight the following aspects of the draft bill:

"4. Section 3 amended

4 (a) "Child and Family Service Network" means the network of services, including Community Services, that

(a) Are centred around a community based intake"

The proposed community intake points have not been instigated as yet. If the legislation includes this point and the community intake points do not eventuate or fail, this will make this component unworkable. Further, if the community intake points are implemented and are successful, there will still be a number of services that provide family support, which do not come under this definition.

"6. Section 13 amended (responsibility to prevent abuse or neglect)"

More information is required in relation to the liabilities and responsibilities for workers who have pregnant clients. This part in particular needs much more clarification and discussion.

“16. Part 5A - Information Sharing”

This is overall a good inclusion, however under 53B. “Secretary may share information and may request information”, if an organisation is required to furnish information to the Secretary, they must be given a reasonable amount of time to provide it.

“53E. Function of a Community Based Intake”

Members have queried as to why Community Based intake points need to be included in the Act. If these are not instigated or are changed, there is concern that the Act will not support the provision of effective family support services. Further changes to the Act would require a lengthy process. Family support services need to be assured that this inclusion will not affect their ability to operate effectively. They are concerned that these groups have been included in the Act without consultation.

Section (e) seems to suggest these community based intake points will determine who provides family support in the region and who does not. This needs consultation.

We look forward to seeing the final Bill and are happy to further discuss any of these issues raised.

Kind regards,

Tom Muller
CEO
TasCOSS