

Strong Families Safe Kids Project
GPO Box 125
HOBART TAS 7000

27 April 2017

To whom it may concern,

The Youth Network of Tasmania (YNOT) welcomes the opportunity to respond to the Common Statement on Information Sharing Consultation Paper. YNOT is the peak body for young people and the non-governmental youth sector in Tasmania. YNOT advocates for the needs and initiatives of young people and the youth sector, and aims to increase the participation and contribution of young people in Tasmania.

YNOT has been an advocate for an approach to positive information sharing for some time. YNOT believes information sharing should be promoted as a matter of course across agencies, and all actors in the area should have the responsibility to share information to improve and integrate service provision. However, YNOT is concerned the proposed Common Statement on Information Sharing does not go far enough to ensure a proactive approach to information sharing in order to better support vulnerable young people as well as youth sector workers.

In particular, we stress the need for information flow across government organisations to provide better and more well rounded service provision. Sharing information is vital to youth sector workers because effective service provision relies upon all relevant information being available. In addition, the most vulnerable families often need assistance from more than one agency, and information needs to be shared for these agencies to work effectively and efficiently together¹. We believe that the current proposal does not go far enough to promote and enable sharing of information freely across agencies. By sharing information across agencies, a more comprehensive assessment of a child and young person's situation can be developed, leading to better outcomes for the child and their family. Sharing information also enables multi-agency intervention and support, which is essential for families with complex needs.



Suite 4a, Mayfair Plaza, 236 Sandy Bay Road, Sandy Bay Tasmania 7005
p 03 6223 5511 f 03 6223 2255 m 0458 235 511
admin@ynot.org.au www.ynot.org.au abn 37 078 758 651

¹ <http://www.dhs.vic.gov.au/for-service-providers/children,-youth-and-families/child-protection>

Feedback routinely received by the youth sector is that information is overly restricted within departments, and services to those who need assistance could be improved by sharing information across departments by focusing on a two-way flow of information between both governmental and non-governmental organisations. This would be enhanced by further promoting intersectional sharing of information between the government and non-governmental sector. Providing very clear guidelines, structures and outlining the responsibilities organisations have in regard to information sharing process can improve services for vulnerable young people.

To achieve these goals, there is scope for including principles in the Common Statement around departments and organisations having a responsibility to share information, and to share it as a more natural course of action. This would firstly have the benefit of providing a more holistic picture to assess whether someone is at risk. For example, sometimes it only becomes clear that a child or young person is at risk, or has been harmed, when information from a number of sources is combined to create a complete picture about the child or young person and their circumstances. Secondly, it would also increase accessibility and efficiency for people wanting to access information when they need it. Often workers in the sector have very high caseloads and more freely available information and clear avenues to share information would resolve some of the pressures associated with this work, increase awareness of other's work (creating less overlap), create more holistic service provision and encourage organisations to actively engage with this information sharing process.

We know that this is possible to achieve and encourage to the Government to go further with the *Common Statement* because proactive ways of sharing information have become the standard amongst other state and international jurisdictions. For example in Victoria, rather than focusing purely on the limits of information sharing they promote a more regular approach to information sharing, for both government and non-governmental actors in the sector. They include an emphasis in many of their guidelines on the role information sharing has in being able to gain efficient and effective outcomes in child protection and have developed specific guidelines for workers in different areas that may need to request information or have information to share.

New Zealand Government information sharing legislation has also placed a significant emphasis on the free flow of information, moving “away from a passive regime where agencies have a discretion to exchange information, to a proactive regime where information should be exchanged unless there are compelling reasons not to”.² This is intended to shift behaviours toward the proactive two way exchange of information rather the overly restricted one-way pattern of information flows. Furthermore, the New Zealand legislation has endeavoured to remove uncertainty, complexities and consequential liabilities facing professionals over the

² <http://www.msd.govt.nz/documents/about-msd-and-our-work/work-programmes/investing-in-children/r-paper-6-information-sharing.pdf>

information they can exchange through an extension of the immunity for good faith disclosure already provided in law, and their guidelines have incorporated useful scenarios which help workers decide whether to share information or not.

Applying the Victorian and New Zealand examples to a Tasmanian context, giving workers and departments more information about what types of information should be shared and highlighting the importance of exchanging information will contribute to gaining a clearer picture of at risk children, young people and families in the community.

YNOT is also concerned that it may be difficult for people within the sector to negotiate the inherent barriers in information sharing with the way the current Common Statement is structured. YNOT recommends that there be further clarification of process and structures in the Common Statement in regards to procedures and policies, and workers to be supported with training in order to take a proactive approach to information sharing. Providing more information, scenarios or case studies to explain the way in which information can be shared sector would support the sector, support at risk children and assess ways in which work could be complementary.

As another example, New South Wales' child protection legislation – Keep them Safe - has incorporated proactive, positive information sharing protocols. The Keep them Safe program was independently evaluated by the University of New South Wales in 2014 under which information sharing has been found to be generally effective and highly valued by those working in the sector³. However, the UNSW study found there were issues reported in relation to its implementation and the continuing challenges around information sharing. Some participants reported delays in receiving requested information, and indicated that the process of requesting and waiting for information detracts from the capacity to deliver services. In this respect, time pressures and high caseloads are felt by people who work in the sector, and it may deter people from sharing information if they have to go through elongated or unclear processes to find or share information. Therefore, YNOT argues having more readily and straightforward available information, and more definite structures as where to access and share information in Tasmania will help promote more frequent and more efficient information use, assist in early identification of at risk, reduce overlap and the alleviate some time and work pressures.

Moreover, the UNSW study suggested that expansion to cover some private sector health organisations and professionals, rather than just in the not-for-profit sector. It was identified that by not including the private sector in the information sharing processes presented an issue for not-for-profit organisations and departments working with clients who were also clients of private practitioners. As a result of this

3

http://www.keepthemsafe.nsw.gov.au/_data/assets/pdf_file/0006/166281/KTS_Outcomes_Evaluation_Final_Report.pdf, p.55

finding in the study, legislation was later expanded to include some private sector health workers such as nurses, registered medical practitioners and registered psychologists. ⁴ YNOT recommends the inclusion of private practitioners be considered for the Common Statement to improve overall service provision.

Lastly, expressing how risk and adversity should also be taken into more account in the principles of the Common Statement. Whilst there is some acknowledgement in the appendix of the Common Statement, providing more information on what the different levels of risk are would help people using the common statement get a clearer understanding as to where children and young people's right to safety can override an individual's right to privacy, or the way in which seeking consent would place a person at increased risk of harm. This is important because the more information, responsibility and structure that is provided with the Common Statement, the more likely people are to use the guidelines and subsequently share information therefore improving the services provided to children and young people.

In conclusion, YNOT is pleased to see there is work happening to increase the sharing of information in order to improve services for vulnerable young people. However, we are also concerned that without further clarification and details about information sharing processes and structures, the effectiveness of this process will be reduced. YNOT emphasises the need for two-way, proactive, cross-sectoral sharing of information and ensuring this process is as efficient and effective as possible.

Yours Sincerely,



Joanna Siejka
Chief Executive Officer

⁴ <http://www.community.nsw.gov.au/kts/guidelines/info-exchange/provide-request>