

**John Angus**

**183 Lowburn Valley Road  
Lowburn  
CROMWELL 9384  
[john.angus@xtra.co.nz](mailto:john.angus@xtra.co.nz)**

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The Commissioners,  
New Zealand Productivity Commission,  
PO Box 8036,  
The Terrace  
WELLINGTON 6143

Dear Commissioners

## **MORE EFFECTIVE SOCIAL SERVICES**

### **Introduction**

My name is John Angus. My background is in social policy in which I have had the following career:

- Social worker for DSW at Dunedin 1977-1986
- Policy analyst, policy manager, senior policy advisor and principal advisor for MSD policy shops and their various predecessors 1987-2002
- Principal advisor Families and Communities Service, MSD, a new service line managing many funding programmes 2002- 2006
- Social policy consultant 2006- 2009
- Children's Commissioner 2009 -2011

My areas of focus were primarily child abuse and neglect, offending by young people and vulnerable families. I also led policy work in the late 1980s on child support and aspects of income support.

For much of my time in MSD from 1995 I worked closely with Richard Wood. He has shared his submission to you with me and I have drawn on it in places. I agree with many of his comments to you.

I am or have recently been a member of the following boards:

- SPARK Foundation – SPARK New Zealand's philanthropic trust (2010 -2014 just resigned)
- Presbyterian Support Otago 2013 -
- Central Otago Health Services Ltd, a NFP company managing the operations of Dunstan hospital and allied health services 2013 -

I was also for the past 3 years Chair of a panel that heard complaints about Child Youth and Family which the service was not able to resolve. The panel makes recommendation to the CE of MSD about how the grievances might be resolved.

Thus the social service domain I am most familiar with is the provision of child protection services, support to vulnerable families, and responses to offending by children and young people. I have also been very involved in responses to family violence more generally. I have worked at service delivery, funding administration, policy and governance levels for 40 years. I will draw on these experiences in this submission.

This submission is in two parts:

- Responses to your content and positions taken in Sections 1,2 and 3 of the paper
- Answers to specific questions

I have reflected in re-reading Part 1 of my submission that it is very critical of central government. I would make four points about this stance:

- First it is a criticism of government attitudes and policies generally. I would not want to denigrate the efforts of some Ministers, several CEs and senior managers, and many front line workers who have worked with non-government organisations to try to achieve better social outcomes for families and children.
- Second it reflects my irritation that you have been asked to look at effectiveness in one small area of the system – the transactions between central government funders and deliverers – and narrowed this down further to contractual arrangements between funders and beleaguered NGO social service organisations. In my view there is much more gain to be had by putting the scrutiny on government's direct provision of service.
- Third your paper continues a long pattern of starting with what goes on in Wellington and what is done by formal agencies, largely ignoring the families and informal community organisations that are at the heart of social service production in the areas I have worked in.
- Fourth my stance reflects anger at the hubris of central government, its ministers and senior officials, in thinking that they are at the heart of solving social problems that arise within families and will ultimately be solved within families. Mason Durie said recently that the high incidence of suicide amongst some groups can only be reduced by changes in families and communities. I totally agree. The challenge for government is to find respectful ways to assist families to do this. The effectiveness of purchase of services by contract will play a very minor role in this.

By now you probably feel I have been so critical of your exercise that this submission is too biased to read further! What follows substantiates and expands on some of the points made above and may have some merit in its own right. I hope it also contributes to your understanding of the systemic social service context of the matters you are focusing on.

## Part 1: Comment on sections 1, 2 and 3

### Social service production

Most social services are delivered by family members and informal community groups, not by government, or by the formalised FP and NFP NGO sector. One needs only to reflect on the extent to which services to restore health depend on individuals, partners, family members and friends. Similarly responses to deal with the psychological harm caused by violence primarily come from family and friends. And at least twice as much intervention and day to day care of children in need of care and protection is provided by extended family members, often acting independently of Child Youth and Family, than by state provision.

The role played by families is not acknowledged at all in your Issues paper and the role played by less formal community based institutions such as networks of friends, or fellow members of churches, or sports clubs is given scant recognition. Yet as Richard Wood notes in his submission:

*Whilst few NGOs will report this, the most vulnerable people in NZ will not go to them for help. The most vulnerable will turn first to a family member or friend. These people actually need support to access and engage with services and have a range of needs outside the scope of a single agency. The most vulnerable are cautious about talking to anyone about their issues and need to have developed a level of trust with people they don't know before they will even talk about their problems. As an example Youthline has reported that, on average, a teen caller will send a minimum of seven text conversations before they are prepared to engage in a telephone conversation. The best way to provide support for the most vulnerable is to encourage community networks in places to which these people are likely to gravitate, such as schools, community or medical centres or marae. Helplines are another key touch point for the most vulnerable that receive only limited funding by Government*

### Definition of social services

You have provided a definition of social services that is much narrower than a definition that includes families and communities. This is because the inquiry is 'primarily concerned with social services provided, funded or otherwise supported by government'. This might of course include support for organisations that work to assist families. In the area I know about this definition is further narrowed down, albeit because of your TOR, to a focus on government's purchase of services from third parties, and does not include direct delivery by government departments, which much of the intervention with families is.

I am aware that your TOR start with a broad remit which includes the commissioning of services, presumably directly delivered and indirectly, but end with a focus on purchasing models. I suggest that in the social service areas with which I am familiar, much more would be gained by asking questions of the effectiveness of the commissioning and funding for direct service provision. The *Baseline Review of Child Youth and Family* (2004) demonstrated what could be gained by a detailed scrutiny of the effectiveness of Child Youth and Family services. Why not start with direct service delivery instead of putting all the pressure on an underfunded insecure NGO sector! Some good questions to ask could be:

- Why are the resources devoted to monitoring the quality and effectiveness of Child Youth and Family field services so risible (I do not mean process auditing)? I had about 4 FTEs to do it in the office of the Children's Commissioner where it was a statutory responsibility to monitor services.
- Where are the client satisfaction surveys?
- Where is the measurement of progress for children in care?
- Is there any proper analysis of what comes back from funded organisations in their reports?
- Is there any effective monitoring of the approval status given NGOS under the CYPF Act (as Children's Commissioner I found some approved Child and Family Support services of appalling quality e.g. the trusts using Felix Donnelly College in Auckland.)
- In income support, where are the surveys of take up rates of benefits measured against the eligible population, something done in other jurisdictions –and a pretty basic measure of effectiveness I would have thought?

The failure to include families and communities also leads to a narrow focus in the formulation of issues on page 6. The third dot point, for example, ignores what expertise might come from families and communities.

This narrowing of perspective is exacerbated by ruling two other areas implicitly and/or explicitly out of scope. The first is the role that is or might be played by local government. This marginalisation of local government would seem to ignore the responsibilities on Auckland to develop a long term plan that includes the social. It also bypasses the innovations in social services that are occurring there in spite of the dead weight of Wellington bureaucracies, for example in education the Manaiakalani Education Trust (MET) work in Tamaki, and programmes described in *Social Innovation in Auckland 2013* (Auckland City)

The second is the exclusion of one of the fundamental ways in which government impacts on the welfare of citizens, their health, education, social wellbeing and material position. I refer of course to the tax benefit transfers system. I acknowledge that this was ruled out in your TOR.

### **The place of families and communities**

I wish to elaborate on the consequences of not bringing families and communities into your analysis. The first point is that the boundary between what government does and what is done by other producers is particularly germane to families. You touch on this in Section 3 pp 14-15.

Over the past two centuries these boundaries have changed extensively in the domains you are interested in. As you note, in the 19<sup>th</sup> century the responsibility for the education of children passed from families and voluntary organisations to the state, reflecting the need for educated workers in the industrial age. In health, responsibility passed from family (and for those who could afford it private nursing), to hospitals and formal primary health services. This occurred primarily as a result of technological changes that made public provision safer and more effective. (See John Angus, *A history of the Otago Hospital Board*, 1979). In

welfare the increased role of the state in the 20<sup>th</sup> century was a consequence of the failure of private and mutual provision and of state attempts to enforce legislation that placed responsibility onto relatives (see David Thompson, *A world without welfare* 1998)

These boundary shifts, sometimes seen as the rise of the welfare state, re-emerged as significant in the 1980s and 1990s in the form of a reduced state role. This was in part because of the hegemony of neo-liberal ideologies in those decades. In mental health, for example, de-institutionalisation undoubtedly put greater demands on families and communities to meet the needs of those who were mentally unwell. Another example which illustrates the complex relationship between state responsibility and family responsibility is the care of neo-natal infants. Gone are the days of 10 day stays in hospital for new mothers, and the frequency of Plunket visits has been reduced. On the other hand the state has been willing to very heavily subsidise the costs to workers of care for under one year olds through the private and community child care sector.

I have explained at some length the reasons for my concern that your failure to bring family and community adequately into your analysis is a serious deficiency. I think it is hard to consider the effectiveness and efficiency of government funding for the production of social services without looking at the interface between government production and family production, and government production and community production. I will explore these further in the next section.

I find it disappointing that your issues paper mostly comes down to a look at the effectiveness of the funding process for NGOs. My reading of the useful tables about the allocation of government funding (which I found somewhat difficult to follow) is that funding to NGOs amounts to \$3.1 billion per annum out of a total funding of \$34 billion. This is less than 10% of the funding. In terms of the effectiveness of government funding of the social services sector this is like looking at one very small part of a complex system.

I appreciate that your TOF set you down this limited path. It is a lost opportunity and I encourage you to be bold and go further to consider such issues and questions as:

- The mess created by the fact that successive governments fiddle endlessly, underpay and over control
- Approaches from outside the sector, such as by iwi looking to improve social outcomes for their members
- Methods that reduce the power of central government – the CE- Minister power nexus
- How to get away from the unsophisticated and narrow way in which many government agencies have treated everything as though it was a purchase when many things are better expressed as a partnership or a grant
- In partnerships getting relationships that work through more power sharing, mutual respect, and acting in good faith – not always features of the government side.
- And what I think is the biggest challenge of all: How can government find ways to respectfully support social service production in families and communities that reduces the incidence of social ills such as child maltreatment and family violence?

## **The Role of Government**

The focus of the review on how tax payers via government can get better value for money when purchasing of services is the mechanism is commendable. However you need to take a very clear-sighted view of government and its actions. Government is not some morally superior agency in its role as a contractor of social services. There is usually a considerable gap between the rhetoric of government and its actions. I urge you to analyse its actions rather than its words.

There are of course some well-established taxonomies of the ways in which government can encourage its citizens to access adequate services or behave in ways that enhance their well-being (regulation, tax incentives, provision of services etc.). Your review focuses on the provision of service through purchasing of services from third parties. I wish to make several comments from my experience on the ways that government has carried out its role as a purchaser.

### ***Funding and levels of funding***

Your consideration of the funding, while in line with the TOR, ignores two other significant funding sources

- The first is funding from the philanthropic sector which in Auckland at least has been a very significant supporter of innovation e.g. MET
- The second is funding donated by individuals through websites such as GiveaLittle. GiveaLittle is a software package owned by the SPARK Foundation and provided without fees to those wishing to use it for welfare purposes. Providers can open an account free of charge, and funders can contribute to it without fees.

When it was bought in 2012 GiveaLittle attracted funds of some \$100,000 a month. Now it attracts funds of \$1.2 million a month and it continues to grow. Most of the funding goes to one-off campaigns and events set up by individuals or groups to meet the social service needs of friends, extended family members, or particular groups of those in need e.g. it funded the return home of the couple whose baby was born prematurely in Shanghai

In respect of levels of funding from government, it is my view that over the past decade successive governments have screwed down NFPs in the social services sector (or certainly the parts of it I am familiar with), putting at risk their sustainability. As Richard Wood has noted

*I have to confess to some scepticism of the motivation of the Government in the face of growing social need, a growth in the country's population of around 400,000 since it came to power (which has added to the demand for services) and inflation of 16% over the same period (which has impacted on NGO capacity) when its sole focus is on how it can spend less through the process of contracting.*

I share his scepticism.

## **Coordination**

In my experience the discourse on coordination, cooperation and collaboration across government departments in the social services sector, in particular around families and children, has gone on in Wellington for at least 30 years. The current Minister of Finance himself has been speaking about it for 24 years. Unfortunately little has changed. What has been put in place is a succession of new cooperative initiatives with aspirational programmes and even more aspirational names, but the reality does not match the rhetoric. For example, information sharing across agencies is still a problem despite the provision of guidance and legislative change.

There are some good reasons for the failure to get cooperation to stick.

- Greater coordination or collaboration cannot compensate for, and may not be possible, with under-resourced and under-skilled frontline staff (Child Youth and Family), strategies to deal with underfunding that include retreating to bunkers (Child Youth and Family), unhelpful cultures that put emphasis on privacy and individual patients and ignore their dependent children's needs (mental health services), and, indirectly, government's pendulum swings about what will achieve greater effectiveness, competition or collaboration across providers.
- One of the issues you have raised on page 6 is the need to have the frontline supportive and engaged in management decisions about collaboration. In my experience this is back to front. In the sectors concerned with children, having the frontline involved is easy to achieve. So too is engaging policy analysts in Wellington. Identifying common goals is key to their participation and such goals are not hard to find in children's outcomes. The barrier is getting regional managers and budget holders committed to collaboration. It is also sometimes difficult to achieve continuity of leadership across changing ministers and CEs.
- Much of what drives non-collaborative behaviour is issues of accountability and power. The new public management paradigm in the late 1980s set in place very strong lines of vertical accountability from front-line to the Minister. While an excellent initiative it did make cross-departmental collaboration more difficult.
- A second even more important factor is power. Collaboration requires some devolution of power from the centre. The executive arm of government in NZ is characterised by a very strong and deliberate nexus of power between individual ministers and their CEs, sustained by the two common ministerial goals in the social services of leaving a legacy of programmes and pleasing the 9<sup>th</sup> floor of the Beehive.

The most successful collaboration I have been part of is the Strengthening Families initiative in the second half of the 1990s. At its heart was collaboration across the Ministers of Health, Education and Social Welfare. They mandated initiatives that

were led personally by their respective Chief Executives. Strengthening Families successes were:

- Establishment of a case coordination process for families who were clients of Health, Education and Child Welfare services that continues 20 years later
- Joint funding from the 3 agencies of programmes which still continue: Family Start, Social Workers in Schools, and funding for children with high and complex needs.

What was important in Strengthening Families' success was:

- Ministerial leadership – although it almost foundered with a change in government in 2000 because it was not 'their' programme
- CE leadership
- A focus on common goals and outcomes
- Working across policy and operations

(See also Murray Petrie, *Welfare to Wellbeing and Strengthening Families* 1999)

I recommend that you add Strengthening Families to your case studies.

### **Government NGO Partnerships**

The most successful partnership I have seen in the social sector between funder and provider is that between the SPARK Foundation and Manaiakalani Education Trust (MET). It has been going some three years and involves several million dollars. The partnership is characterised by:

- Mutual respect and recognition of equal power in the partnership
- Agreement on outcomes sought and how they will be measured
- Assumptions of good faith reinforced regularly by behaviours
- Stability of principals
- Collaboration at a governance level and at a management level
- A high level of trust, to the point that allows grants to be made for a general purpose, with MET to decide on the allocation to a project budget
- A great deal of communication both ways.

In my experience government is not good at partnerships with NGOs. Its relationships are characterised by:

- Variable respect and often arrogance from Wellington
- Uncertain mandates from Ministers
- Frequent change of principals and at the operational level
- Behaviours from government that demonstrate lack of trust

Richard Wood has put it elegantly in his submission

*If the Government is serious about ensuring that it has the most effective social services available, it needs to work in partnership with the sector in a*



*collaborative and respectful way. Many of the questions posed in your Issues paper reveal a quite different attitude. This does not mean that formal contracts for the provision of taxpayer funding do not require accountability for its use.*

*New Zealand is fortunate in having some highly effective and professional non-government organisations operating in the social services area. Some have an international reputation. The leadership of these organizations, in my personal experience, has generated far more innovation and clever experimentation than any Government policy process.*

*In return the Government and its agencies have applied a level of institutional arrogance and disrespect to NGOs that have left some in despair. (I have used the term 'institutional' to differentiate from the much more collegial approach used by some operational managers and front line public servants)*

In many cases purchasing arrangements get in the way. Again Richard has put it well:

*Every NGO that receives Government funding is audited by the funder. This is quite appropriate but what if they are funded by several funders? Then they are audited by all of them. In 2010 MSD introduced High Trust Contracts to reduce the impact and cost of compliance on community agencies.*

*Every NGO that receives Government funding is required to report back to its funder on the units delivered, results or outcomes that it is required to achieve. This reporting is more often than not delivered through a computerized software package provided by the funder. (Sometimes the NGO may have designed a more effective system). But what if the NGO has a number of funders and its staff are required to manage a half a dozen different computerized reporting systems?*

*Most NGOs I have had a relationship with are highly tuned in to the need for accountability, the value of monitoring, the importance of reporting and the value of effective accounting systems. They are tired and frustrated with the amount of time they must devote to compliance, multiple and different forms of reporting and audits and to finding avenues of additional funding from philanthropic trusts that will enable them to remain viable*

It is an indictment of central government's performance over the past decade that the official leading most of the work to improve relationships and make them more of a partnership comes to such conclusions.

Behind much of the difficulties is the strong nexus that exist between the power of CEs and the power of Ministers, and their interest in its being sustained. In my opinion current constitutional and institutional arrangements will make it difficult to reduce the power between CEs and ministers. Thus the best avenues to explore, in my view, are what could come out of Auckland, which has a mandate, mass and a strong philanthropic sector willing to pick up the tab of truly community led initiatives. Again MET is a great example. It would make a great case study. (I note there are no

education sector case studies). The second avenue is iwi based initiatives, which again have a mandate in the Treaty and funding through profits from settlement ventures. I am encouraged by what you have said about the potential of such initiatives.

### **Government and community based initiatives**

In my view Government's attempts to support and build up community initiatives - those that have genuine grassroots ownership and support – have not been successful. For many communities government support has been a very mixed blessing. Here are some examples:

- I have heard Kim Workman very cogently argue that for 100 years iwi, hapu and marae based initiatives have been essentially colonised by government departments. Examples are: initiatives within Maori communities to support families of men who were at war, the Maori Women's Welfare League and, potentially, kohanga reo. Such a process is a risk for Whanau Ora and I urge you to be aware of it in your case study.
- Provisions under the CYPF Act allowed for the establishment and approval of Iwi Social Services and Cultural Social Services, services with some of the powers of Child Youth and Family. In the 1990s I was responsible for making it happen along with senior officials from Child Youth and Family and the Community Funding Agency. The reasons for the failure were several: non-cooperation between Child Youth and Family and CFA over funding, an insistence that any service look very similar to Child Youth and Family, an unwillingness to give up power and control that verged on institutional racism and a breach of article 1 of the Treaty
- A Community Initiatives Fund that threw money at community programmes in a way that almost inevitably set up failures.

### *Problems in government's approach*

One of the problems is that the government social service sector usually has no clear and consistent idea about what to hold tight to the centre (by direct centralised delivery or tight contracting), and what to run with a very loose reign in order to get the benefits of regional/local information about what will work, how/who should deliver it, and innovation. In the NGO contracting I led we usually got it quite the wrong way around. Family Start is a good example I am sorry to say. We tightly controlled things that did not matter much in terms of effectiveness - like reporting timetables, some inputs and a few financial controls - while being quite loose about what did matter – like clear outcomes, feedback loops including outcomes measures and a vigorous setting out and rigorous guarding of goals and operating principles.

Behind this lies a more disturbing failure on the part of government. It is the failure to develop a consistent strategic approach to significant areas of social service. I am most familiar with strategies about families and children at risk of poor outcomes. My career, I am ashamed to say, is littered with 'strategies' and 'action plans' few of which gained any grip. I sometimes think the main legacy is a palimpsest of labels papered over the real world and

with salience only in Wellington: Families at Risk, Families Old and Young (or was it vice versa?), the Children's Agenda, now Vulnerable Children.

The government has a difficult task in developing a strategy. In responding to child maltreatment at a prevention level it sometimes felt like there were two worlds talking past each other – those going down the prescriptive, manualized, well evaluated, programmatic approach (UK was big into it and Incredible Years is an excellent example) . And the other based on community development approaches. While my inclination is always towards the latter because it seemed to hold the potential to stop people falling into the vulnerable category that would need formal programme responses, the most sensible way to deal with this seeming divide is to get the best out of both worlds.

There are some examples of community-based organisations doing this – being able to call on a menu of programmes in response to what their clients want after the maturing of a range of community development approaches such as new mother's coffee mornings. One is in a suburb in Palmerston North (Te Aroha Noa), and another in a Barnardos community house in Lower Hutt (Great Start Taita). This is far removed from a one size fits all externally imposed programme usually sold by government as 'Have we got a good deal for you'. The most recent attempt was the Melbourne -based toddler programme someone got into a budget package a few years ago, which failed to achieve useful participation and retention rates.

Government, however, has to take responsibility for starting and then failing to follow through on so many strategies (usually because of a change of minister and/ or administration). Whatever the reason, the lack of a long term sustainable strategy is inimical to partnerships and working with communities because it meant all too often the government side had no lasting goals, no operating principles and no security that it would not all change.

Another problem is that many government funding processes suck energy out of communities rather than adding to it. This has been covered above in the section on partnerships and the way purchasing processes can impose on community groups in ways that well exceed meeting accountability requirements.

#### *An example of success*

The most successful support of community based initiatives I witnessed, many of them stimulated by a government programme, was *SKIP* in the area of child welfare, and *It's not OK* in the area of family violence. I sat near to the Skip team in FACS, and saw some of the elements of their success:

- They were very clear with the multifarious local groups they worked with what the bottom line objectives and guiding principles were. (I well remember the reaction when they discovered that someone - who they had funded to deliver talks organised by parenting groups - had been pushed in answering a question to agreeing that a smack on the backside was one appropriate intervention – which was well outside the guiding principles! The SKIP team came down like a ton of bricks).
- They were also clear and consistent about the outcomes being sought, and about feedback, which was to include participant satisfaction surveys.

- Their relationship with NGO groups was based on respect, assumptions about all acting in good faith, a clear sense of what power they (Skip) needed to wield and when, and when it was a local responsibility.
- The team did an extraordinary amount of making links and networking and encouraging innovation. It was all done by countless hours on the phone.
- They discussed all the proposals for a particular town or area in an open public forum, with applicants invited to make their pitch. The result was a great deal of on the spot rationalising, coordination, collaboration and innovation.

It seemed a world removed from that of most funding advisors, whose work consisted of occasional visits, following up about accountability documents, and a lot of box ticking. Overall, SKIP added energy to community based delivery. So much else I was responsible for sucked it out.

I encourage you to look at reports recoding some of the SKIP success – Alex Woodley and Nadine Metzger, *SKIP what it is and why it works* 1999; Gravitas Research and Strategy, 2005; and Philip Gander's report available from Marti Eller.

## **Government and families**

### *It needs to start with families and communities*

It is a particularly blind form of hubris to think that central government can 'solve' social problems that arise in the family domain, notably child abuse and neglect and other violence within families. This is obvious if you agree with the conclusion that these problems primarily arise within families and are addressed within families. But government (with the notable exception of *It's Not Okay*), persists in a focus on responses through the government or formal NGO sector. For evidence of the fact that these problems are most often addressed within families I refer you to the role played by grand-parents and siblings in protecting women from violence and in removing children from situations where they are maltreated. When I was Children's Commissioner I found evidence that suggested that the number of grandparents who took children out of situations where there was a need for care and protection and cared for them themselves, was of the order of 2x the number of similar interventions and care placements by social workers.

Of course central government has to address the consequences of child maltreatment and family violence in ways that reduce re-offending. However, trying to achieve a significant reduction in the incidence of child-maltreatment by starting with Child Youth and Family as many government initiatives do, is a bit like trying to reduce the incidence of diabetes by starting with the workings of dialysis units.

### *Family violence*

In respect of family violence I was part of 30 years hard, committed (if under-resourced) government attempts to reduce its incidence. The impact was marginal. Problems of violence arise within the family domain. Real reductions in incidence need to come from family change. External solutions have to impact on the same domain. The family violence

NGO sector, which deserves enormous respect, sometimes presented the solution as funding them to a level that a service would be provided to every victim. It is not what research shows most victims want. The contribution that more effective purchasing from agencies working in family violence might make is likely to be marginal.

*An analysis of the latest vulnerable children initiatives*

The current vulnerable children initiative contains much that is excellent. The action plan acknowledges the role of families and communities and promises action to engage them in new approaches. The legislation introduced in 2014, the Vulnerable Children Act 2014, however, illustrates how difficult it seems to be to facilitate the development of a strategy that involves families and communities and how they might be given real power and ownership of processes for change.

In my view the bill:

- is locked into a Wellington-centric view that gains will come out of Wellington actions (making CEs responsible, greater centralised regulation of workers)
- continues an approach of stigmatising parents (subsequent children initiatives)
- promises to break down barriers to information sharing in cross sector work, but this has been part of the discourse for 20 years
- focuses on more detection not better responses to what has been detected, something that should be the primary focus of government investment
- emphasises on physical abuse, not on what is by far the most common cause of harm to children, which is the neglect of their needs
- puts considerable energy into checks on workers with children in formal settings. What proportion of child maltreatment occurs in such settings compared with its incidence in families?

In my view this rather meagre grab-bag of initiatives illustrates just how marginal the role of government is unless it finds ways to work with families and communities to reduce child maltreatment.

In conclusion , I urge you to broaden you brief to consider how the commissioning and funding processes between government and social service providers, including those within families and in informal community groups, might be reformed to strengthen their contribution to meeting the needs of their members.