



commission for  
children and young people  
and child guardian

*A better life for Queensland children*

# Indigenous Child Placement Principle

*Audit Report 2010/11*

# Child Placement Principle Compliance Assessment Tool

Every applicable step must be complied with and recorded to fully comply with s83 of the *Child Protection Act 1999*

WHEN CONSIDERING ALL PLACEMENT OPTIONS THE WELFARE AND BEST INTERESTS OF THE CHILD ARE PARAMOUNT.

## STEP 1

Identify the child is Indigenous under s83(1)

Is the child Indigenous?  
 ✓ Yes: compliance  
 go to step 2 ▶

✗ No:

Indigenous Child Placement Principle (s83 of the *Child Protection Act 1999*) does not apply

## STEP 2

Involvement of a recognised entity (RE) s83(2) and (3)

Has the recognised entity been given an opportunity to participate in the decision-making process?  
 ✓ Yes: compliance  
 go to step 3 ▶

✗ No:

If the placement was made due to urgent circumstances, was the recognised entity consulted as soon as practicable after the decision was made?  
 ✓ Yes: compliance  
 ✗ No: non-compliance

## STEP 3

Hierarchy of placement options s83(4) and (6)

Were any family members identified as placement options?

✓ Yes: compliance  
 go to step 4 ▶

✗ No:

Were any community/language group members identified as placement options?  
 ✓ Yes: compliance  
 go to step 4 ▶

✗ No:

Were any compatible Indigenous carers identified as placement options?  
 ✓ Yes: compliance  
 go to step 4 ▶

✗ No:

Were any other Indigenous carers identified as placement options?  
 ✓ Yes: compliance  
 go to step 4 ▶

✗ No:

Were any non-Indigenous carers living near the child's family or community/language group members identified as placement options?  
 ✓ Yes: compliance  
 go to step 4 ▶

✗ No:

Were other placements considered?  
 ✓ Yes: compliance  
 go to step 4 ▶

## STEP 4

Proper consideration of placement options s83(5)

Has proper consideration been given to

- The placement option's ability to ensure optimal retention of relationships with parents, siblings and people of significance, and
- The views of the recognised entity?

✓ Yes:  
 and placement option was suitable and placement option was suitable compliance  
 go to step 5  
 (if carer is non-Indigenous) ▶

✓ Yes:

but placement option was not suitable  
 ◀ go back to step 3

✗ No: non-compliance

## STEP 5

Assessment of non-Indigenous carers' commitment s83(7)

Has proper consideration been given to the non-Indigenous carer's commitment to

- Facilitating contact between child and the child's family?
- Helping maintain contact with community or language group?
- Helping maintain connection with culture?
- Preserving and enhancing child's sense of Aboriginal or Torres Strait Islander cultural identity?

✓ Yes: compliance

✗ No: non-compliance



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# Foreword

The context of child protection for Aboriginal and Torres Strait Islander children and young people has significantly evolved over the past few decades. This shift has taken Queensland from a devastating practice of removal to a necessary recognition of the importance of raising children within their family, community and culture where they are no longer able to remain safely in the care of their biological parents.

The Indigenous Child Placement Principle was embedded in section 83 of the *Child Protection Act 1999* to prescribe a process that must be followed by the Department of Communities when making out-of-home care placement decisions for Aboriginal and Torres Strait Islander children and young people, to help maintain their connection to family, community and culture.

**As the Commissioner for Children and Young People, I have been tasked with a legislative responsibility to monitor the Department of Communities' compliance with section 83 of the *Child Protection Act 1999*. This report represents the second audit I have conducted in fulfilling this responsibility.**

Compliance with section 83 of the *Child Protection Act 1999* is achieved when a small number of discrete steps are each observed and actioned appropriately in the placement decision making process. These decisions must always represent the best interests of the child concerned.

My inaugural *Indigenous Child Placement Principle Audit Report 2008* made 28 recommendations to the former Department of Child Safety to improve compliance with section 83 of the *Child Protection Act 1999*. Those recommendations were aimed at enhancing departmental policies, procedures and systems to help support child safety officer decision making and record keeping.

My current Indigenous Child Placement Principle Audit 2010/11 has an expanded scope and is comprised of three key components, which together provide a more complete view of the administration of section 83 of the *Child Protection Act 1999*, and what it can achieve for Aboriginal and Torres Strait Islander children and young people in out-of-home care. This has involved auditing:

- the Department of Communities' **mechanisms supporting compliance** with section 83 of the *Child Protection Act 1999* (the policies, procedures and record keeping infrastructure in place), based on a targeted evaluation of implementation of the 28 recommendations made in the inaugural audit
- the Department of Communities' **practice compliance** with section 83 of the *Child Protection Act 1999*, based on an assessment of its electronic records and surveys of the Child Safety Officers and Recognised Entities involved in the 388 placement decisions made in 2008/09 comprising the audit sample, and
- the **outcomes achieved** for children and young people in out-of-home care, based on their reported connection to family, community and culture.

The audit logic being that, if the Department of Communities has sufficient **mechanisms supporting compliance** in place, there will be increased **practice compliance** with section 83 of the *Child Protection Act 1999*, which will in turn lead to better **outcomes achieved** for Aboriginal and Torres Strait Islander children and young people in out-of-home care.

**This second audit has demonstrated that compliance with each step required by section 83 of the *Child Protection Act 1999* is quite good. However, when viewed together, complete compliance with all required steps was only achieved in 15% of the sample, an improvement on the findings of the inaugural audit.**

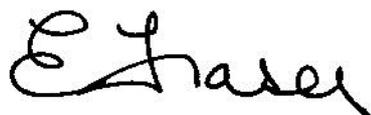
Low compliance can be attributed in part to the Department of Communities' delays in implementing the majority of the inaugural recommendations relating to improved policy, practice and record keeping before the audit sample was extracted. Specifically, nine of the 28 inaugural recommendations are now being implemented. As such, record keeping was again a significant issue impacting on my capacity to adequately assess compliance, with records either not available or not containing sufficient rationale about the placement decision making process. The audit findings are therefore not reflective of the improvement that was anticipated to occur with complete implementation of the inaugural recommendations.

**My compliance assessment is also complemented by some very positive findings about the outcomes experienced by Aboriginal and Torres Strait Islander children and young people in out-of-home care, relevant to their connection to family, community and culture. A key finding is that 89% of children and young people were reported as having some level of parental contact, the most common frequency identified as weekly contact (41%).**

Those children and young people placed with Indigenous carers reported better outcomes compared to those placed with non-Indigenous carers. A key finding in this regard is that they exhibited more weekly contact with their traditional language/tribal/totem group (41% greater) than those placed with a non-Indigenous carer.

I have received invaluable assistance from an Advisory Committee in this audit. This panel of external experts in child protection and/or Aboriginal and Torres Strait Islander health and wellbeing provided advice to me on key issues relevant to the audit. The Advisory Committee was comprised of representatives from the Queensland Aboriginal and Torres Strait Islander Child Protection Peak Inc, Foster Care Queensland, the Remote Area Aboriginal and Torres Strait Islander Child Care, the Department of Communities and the Indigenous Studies Unit at the University of Queensland. I am grateful for the contribution of these experts, which has provided a transparent mechanism for me to seek advice on specific complex and/or sensitive issues during the audit. I would like to thank the Recognised Entities and Child Safety Officers who completed the online surveys that form part of the audit.

Last, but certainly not least, I offer my sincere thanks to the many Aboriginal and Torres Strait Islander children and young people who gave their time to the Commission's Community Visitors to help increase my understanding of how well their connections to family, community and culture are being maintained while in care. I will do my utmost to make their feedback known and translated into action.



Elizabeth Fraser

**Commissioner for Children and Young People  
and Child Guardian**

# Executive Summary

The purpose of this report is to detail the findings of the Commission's second audit of compliance with section 83 of the *Child Protection Act 1999* by the Department of Communities. The audit process has explored three key areas, namely:

- the Department of Communities' **mechanisms supporting compliance** with section 83 of the *Child Protection Act 1999* (the policies, procedures and record keeping infrastructure in place), based on a targeted evaluation of implementation of the 28 recommendations made in the inaugural audit to enhance these elements
- the Department of Communities' **practice compliance** with section 83 of the *Child Protection Act 1999*, based on an assessment of its electronic records and surveys of the Child Safety Officers and Recognised Entities involved in the 388 placement decisions made in 2008/09 comprising the audit sample, and
- the **outcomes achieved** for children and young people in out-of-home care relevant to their maintained connection to family, community and culture as a result of the Department of Communities' efforts to comply with section 83 of the *Child Protection Act 1999*.

Each component of the audit was informed and guided by an Advisory Committee comprised of experts in child protection and/or Aboriginal and Torres Strait Islander health and wellbeing.

Overall, the audit findings indicate that there is a need for the Department of Communities to continue to strengthen the **mechanisms supporting compliance**. Doing so will assist Child Safety Officers in their **practice compliance** with section 83 of the *Child Protection Act 1999*. In turn, this will likely contribute to better **outcomes achieved** for Aboriginal and Torres Strait Islander children and young people in out-of-home care (in relation to their connection to family, community and culture).

The Commission has made 10 new recommendations to address areas requiring improvement, in addition to the nine recommendations that are currently being implemented from the inaugural audit.

## Part A – The Department of Communities' mechanisms supporting compliance with section 83 of the *Child Protection Act 1999*

Part A of this report monitors the Department of Communities' **mechanisms supporting compliance** with section 83 of the *Child Protection Act 1999* (the policies, procedures and record keeping infrastructure in place), based on a targeted evaluation of implementation of the 28 recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008* which identified the need to enhance these elements.

Overall, the Department of Communities has implemented 19 of the 28 inaugural recommendations intended to enhance the mechanisms supporting compliance with section 83 of the *Child Protection Act 1999*.

In summary, of the 19 recommendations implemented to date:

- 15 recommendations related to improving guidance in the Department of Communities' policies and procedures to support compliance

- three recommendations were aimed at enhancing the Department of Communities' record keeping practices in its Integrated Client Management System (ICMS) to support compliance, and
- one recommendation related to the Department of Communities considering the creation of specialist positions to assist in placements for Aboriginal and Torres Strait Islander children and young people.

Nine recommendations are currently being implemented with a planned implementation timeframe of March/April 2012. Of these:

- eight relate to enhancing the Department of Communities' record keeping practices in its ICMS to support compliance, and
- one relates to the Department of Communities rolling out comprehensive training for Child Safety Officers (following the implementation of all of the Commission's inaugural recommendations).

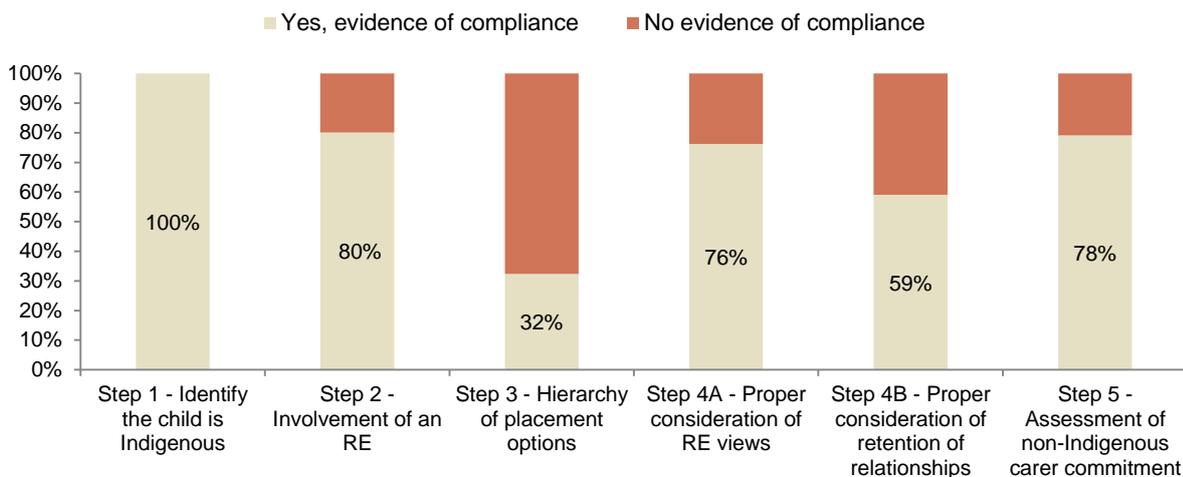
The Commission will monitor the Department of Communities' implementation of the remaining nine recommendations in accordance with the nominated timeframes.

### **Part B – Department of Communities' practice compliance with section 83 of the *Child Protection Act 1999***

Part B of this report monitors the Department of Communities' **practice compliance** with section 83 of the *Child Protection Act 1999*. This assessment is based on a triangulation of data from its electronic records and surveys of the Child Safety Officers and Recognised Entities involved in the 388 placement decisions made for Aboriginal and Torres Strait Islander children and young people in 2008/09 which comprise the audit sample.

Analysis of these three information sources revealed that there has been an improvement in the Department of Communities' practice compliance with section 83 of the *Child Protection Act 1999* since the inaugural audit in 2008 (15% compliance across all required steps this audit compared to no record of complete compliance in the 2008 audit).

Where evidence was available to make an assessment against the Compliance Assessment Tool, the Department of Communities' compliance with most of the individual steps required by section 83 of the *Child Protection Act 1999* was identified as positive.



However, complete compliance with all required steps of the Compliance Assessment Tool was not as strong and was established for 58 (or 15%) of the 388 placement decisions comprising the audit sample. This finding suggests that while compliance with each step of the Compliance Assessment Tool is good when viewed in isolation, Child Safety Officers need to improve compliance with all necessary steps.

Low overall compliance can be attributed in part to delays in the Department of Communities implementing the recommendations of the inaugural (2008) audit.

Once the suite of inaugural recommendations are implemented in their entirety, Child Safety Officers will be provided with both increased mechanisms for support and better record keeping opportunities which would enhance practice compliance with section 83 of the *Child Protection Act 1999*.

### Part C – Outcomes achieved as a result of the Department of Communities’ efforts to comply with section 83 of the *Child Protection Act 1999*

Part C of this report monitors the **outcomes achieved** for Aboriginal and Torres Strait Islander children and young people in out-of-home care relevant to their connection to family, community and culture as a result of the Department of Communities’ efforts to comply with section 83 of the *Child Protection Act 1999*.

This analysis is based on data contained in the Commission’s Jigsaw information management system. This data was collected by Commission Community Visitors (CVs) in targeted interactions with 1109 Aboriginal and Torres Strait Islander children and young people in out-of-home care during July 2010.

CV data indicated that overall, Aboriginal and Torres Strait Islander children and young people in out-of-home care are experiencing positive outcomes in regard to their contact with family and community and their opportunity to participate in cultural activities and events. This finding suggests that while technical compliance with section 83 of the *Child Protection Act 1999* remains low, positive outcomes are still being achieved for Aboriginal and Torres

Strait Islander children and young people in out-of-home care. Key findings indicate that:

- 89% of children and young people were reported as having some level of parental contact, the most common frequency reported to be weekly contact (41%)
- 80% of children and young people were reported as satisfied with parental contact
- 93% of children and young people were reported to be having some level of contact with other family members, the most common frequency of contact reported to be weekly contact (56%)
- 89% of children and young people were reported to be satisfied with their contact with other family members
- 70% of children and young people were reported to be having some level of contact with their traditional language/tribal/totem group, the most common frequency for contact reported to be weekly contact (40%)
- 91% of children and young people were reported to be satisfied with their contact with their traditional language/tribal/totem group, and
- 96% of children and young people were reported to be offered at least one type of cultural activity/resource.

However, improving compliance with section 83 of the *Child Protection Act 1999* will help to ensure that Aboriginal and Torres Strait Islander children and young people are placed in the most culturally appropriate placements related to their specific needs and family structure.

As part of the assessment of outcomes achieved, the Commission compared the experiences of children and young people placed with Indigenous and non-Indigenous carers. Aboriginal and Torres Strait Islander children and young people placed with Indigenous carers demonstrate the same, or better, outcomes across every measure of family and community contact and experience greater opportunities to participate in cultural activities and events.

Specifically, Aboriginal and Torres Strait Islander children and young people placed with an Indigenous carer were reported to have:

- Greater satisfaction with parental contact than those placed with a non-Indigenous carer
- More weekly contact with other family members than those placed with a non-Indigenous carer
- More weekly contact with their traditional language/tribal/totem group than those placed with a non-Indigenous carer, and
- More opportunities to participate in every type of cultural activity/resource offered than those placed with a non-Indigenous carer.

This is a significant finding and highlights the importance of efforts by the Department of Communities to recruit Indigenous carers and the need for continuing focus for compliance with Step 5 in the placement process when Indigenous carers are not available.

The 10 recommendations made by the Commission in this audit are summarised in the following table.

**Table 1: Summary of recommendations made in this audit report**

Number	Proposed recommendations
1 Record keeping	The Department of Communities adhere to the nominated timeframes assigned to the nine recommendations made in the inaugural <i>Indigenous Child Placement Principle Audit Report 2008</i> that are currently being implemented, or establish (by the end of April 2012) another mandatory recording keeping process to enable it to monitor and manage compliance with each of the five steps.
2 Practice support	The Department of Communities consider ways to strengthen its practice and record keeping related to the application of section 83 of the <i>Child Protection Act 1999</i> by communicating the findings of this audit and the Compliance Assessment Tool to its Child Safety Officers as the basis upon which its future efforts will be assessed. A documented communication plan is to be developed by the end of April 2012.
3 Record keeping	The Department of Communities commit to a timeframe for enhancing ICMS to make completion of the 'Recognised Entity/Child Placement Principle' form mandatory when making a placement decision for an Aboriginal or Torres Strait Islander child or young person, and advise of this timeframe by the end of April 2012.
4 Practice support	The Department of Communities review and (by the end of April 2012) clarify its practice guidance regarding the application of section 83 of the <i>Child Protection Act 1999</i> to respite placements for Aboriginal and Torres Strait Islander children and young people.
5 Record keeping	The Department of Communities collaborate with Recognised Entities, either through their peak representative body, the Queensland Aboriginal and Torres Strait Islander Child Protection Peak, or at a local level, to confirm information sharing needs and processes in regard to placement decisions for Aboriginal and Torres Strait Islander children and young people and to confirm the record keeping requirements and obligations of both. An agreed outcome is to be documented by the end of April 2012.
6 Practice support	The Department of Communities clarify (by the end of April 2012) in the relevant policy and procedural documents that placement decisions must be reviewed within a specified amount of time where emergency placements are made for Aboriginal and Torres Strait Islander children and young people and section 83 of the <i>Child Protection Act 1999</i> is unable to be applied.
7 Record keeping	The Department of Communities establish an appropriate record keeping mechanism, in ICMS or otherwise, to record: <ul style="list-style-type: none"> <li>when and why emergency placements are made for Aboriginal and Torres Strait Islander children and young people and section 83 of the <i>Child Protection Act 1999</i> is unable to be applied, and</li> <li>the timeframe that the placement decision was reviewed within, and</li> <li>the outcome.</li> </ul> <p>Advice is required by the end of April 2012 of the proposed approach and timeframe required to implement.</p>
8 Practice support	The Department of Communities explore ways to strengthen information gathering, and provision to Aboriginal and Torres Strait Islander children and young people, about their Mob, and advise of the proposed strategies by the end of April 2012.
9 Carer support	The Department of Communities continue its Indigenous carer recruitment efforts and by the end of April 2012 include key findings from this report in its training and support of all carers in helping drive cultural outcomes for Aboriginal and Torres Strait Islander children and young people in out-of-home care.
10 Practice support	The Department of Communities use the information in this report to help identify where strengths and weaknesses in regional service delivery exist in regards to Aboriginal and Torres Strait Islander children and young people's family and community contact and opportunity to participate in cultural activities/events, and advise by the end of April 2012 of proposed strategies.

# Chapter 1

## Introduction and Background

### 1.1 Purpose of the Indigenous Child Placement Principle

The Indigenous Child Placement Principle was established in the 1980s in recognition of the devastating and intergenerational impacts of the systematic removal and assimilation of Aboriginal and Torres Strait Islander children and young people, and in response to the large number of Aboriginal and Torres Strait Islander children and young people in the child protection system, particularly those placed in non-Indigenous care.<sup>1</sup>

The adoption of the Indigenous Child Placement Principle reflected a necessary change in understanding and approach as to what constitutes the 'best interests' of Aboriginal and Torres Strait Islander children and young people in a child protection and wellbeing context.<sup>2</sup>

The Indigenous Child Placement Principle is founded on the understanding that it is in the best interests of Aboriginal and Torres Strait Islander children and young people to be raised within, or in connection with, their own family, community and culture where they are no longer able to remain safely in the care of their biological parents.<sup>3</sup>

Aboriginal and Torres Strait Islander children and young people continue to be over-represented in the child protection system in Queensland, highlighting compliance with the Indigenous Child Placement Principle as a key practice approach to helping maintain connection to family, community and culture. A profile illustrating the continued over-representation of Aboriginal and Torres Strait Islander children and young people is provided in Chapter 2 of this report.

### 1.2 History of the Indigenous Child Placement Principle

Table 2 provides an overview of the history of the Indigenous Child Placement Principle.

**Table 2: History of the Indigenous Child Placement Principle**

Year	Event
1975	<i>Commission of Inquiry into the Nature and Extent of the Problems Confronting Youth in Queensland</i> identifies the potential adverse consequences of placing Aboriginal and Torres Strait Islander children in unsuitable out-of-home care environments and recommends that the (then) Department of Children's Services adopt the policy of using Aboriginal and Torres Strait Islander employees in placement decisions and case planning.
1976	First Australian Conference on Adoption raises concerns about the large number of

<sup>1</sup> *Aboriginal and Torres Strait Islander Child Placement Principle* fact sheet, Department of Child Safety, and page 4 of the *Aboriginal and Torres Strait Islander Child Placement Principle Discussion Paper*, Department of Child Safety.

<sup>2</sup> *The Aboriginal Child Placement Principle Research Report 7, 1997*, New South Wales Law Reform Commission.

<sup>3</sup> Page 4 of the *Aboriginal and Torres Strait Islander Child Placement Principle Discussion Paper*, Department of Child Safety.

	Aboriginal children in the care of 'white' families.
1978	<i>Indian Child Welfare Act 1978</i> is introduced in the United States of America. The legislation contains a hierarchy of placement options for Indian children that is similar to the Indigenous Child Placement Principle.
1980	Department of Aboriginal Affairs (Commonwealth) publishes policy guidelines about adoption and fostering of Aboriginal children. The guidelines place a high priority on maintaining Aboriginal children in their family and community environment.
1984	Queensland Government adopts the Indigenous Child Placement Principle as policy.
1989	Royal Commission into Aboriginal Deaths in Custody affirms the need for the Indigenous Child Placement Principle to be implemented in legislation. It also identifies that Queensland failed to properly implement the Indigenous Child Placement Policy and this resulted in "large scale institutionalisation and removal of Aboriginal and Torres Strait Islander children from their communities".
1999	Indigenous Child Placement Principle inserted into <i>Child Protection Act 1999</i> .
2001	Review of Queensland children in care by former Department of Families reveals that approximately 25% of the Aboriginal and Torres Strait Islander children in the review were identified as having limited or non-existent contact with or understanding about their culture and heritage.
2004	Crime and Misconduct Commission's report <i>Protecting children: An inquiry into abuse of children in foster care</i> identifies need for the Commission, through its Child Guardian function, to monitor compliance with the Indigenous Child Placement Principle.
2006	The <i>Child Safety Amendment Act 2005</i> amended section 83 of the <i>Child Protection Act 1999</i> . Section 83(6) and 83(7) were inserted which relate to non-Indigenous carers.
2008	The Commission conducts its inaugural audit of compliance with section 83 of the <i>Child Protection Act 1999</i> , and makes 28 recommendations for improvement.

### 1.3 Legislative basis for the Indigenous Child Placement Principle

All Australian jurisdictions have now adopted the Indigenous Child Placement Principle in legislation to varying degrees.

The Indigenous Child Placement Principle has been given legislative basis in Queensland in section 83 of the *Child Protection Act 1999*.<sup>4</sup>

The Honourable Anna Bligh, in her capacity as Queensland's Minister for Families, Youth and Community Care and Minister for Disability Services, made the following comment in her Member's Speech of 10 November 1998 in relation to the *Child Protection Bill 1998*:

*One of the most unacceptable issues facing child protection in Queensland is the significant overrepresentation of Indigenous children in the State's care. It is therefore imperative that the bill entrenches the Child Placement Principle, which requires that departmental officers consult with appropriate agency or community representatives when making decisions about Aboriginal and Torres Strait Islander children, and must ensure the maintenance of Indigenous children's cultural identity.*

<sup>4</sup> Formerly section 80 in the original enactment of the *Child Protection Act 1999* and later renumbered to section 83 in the 28 April reprint of the *Child Protection Act 1999*.

Accordingly, section 83 of the *Child Protection Act 1999* outlines a prescriptive decision making process that the Department of Communities must adhere to when making a placement decision involving an Aboriginal or Torres Strait Islander child or young person. This process involves proper consideration of the following four key elements before an Aboriginal or Torres Strait Islander child or young person is placed in out-of-home care:

- A hierarchy of placement options
- Recognised Entities' involvement in the placement decision
- Retention of family and community relationships, and
- Non-Indigenous carers' commitment.

However, section 5 of the *Child Protection Act 1999* stipulates that the paramount consideration in making a placement decision for any child is always the welfare and best interests of the child, meaning that, for example, placements must still be assessed and accredited to confirm they are safe.

#### **Section 83 of the *Child Protection Act 1999***

- (1) This section applies if the child is an Aboriginal or a Torres Strait Islander child.
- (2) The chief executive must ensure a recognised entity for the child is given an opportunity to participate in the process for making a decision about where or with whom the child will live.
- (3) However, if because of urgent circumstances the chief executive makes the decision without the participation of a recognised entity for the child, the chief executive must consult with a recognised entity for the child as soon as practicable after making the decision.
- (4) In making a decision about the person in whose care the child should be placed, the chief executive must give proper consideration to placing the child, in order of priority, with—
  - (a) a member of the child's family; or
  - (b) a member of the child's community or language group; or
  - (c) another Aboriginal person or Torres Strait Islander who is compatible with the child's community or language group; or
  - (d) another Aboriginal person or Torres Strait Islander.
- (5) Also, the chief executive must give proper consideration to—
  - (a) the views of a recognised entity for the child; and
  - (b) ensuring the decision provides for the optimal retention of the child's relationships with parents, siblings and other people of significance under Aboriginal tradition or Island custom.
- (6) If the chief executive decides there is no appropriate person mentioned in subsection (4)(a) to (d) in whose care the child may be placed, the chief executive must give proper consideration to placing the child, in order of priority, with—
  - (a) a person who lives near the child's family; or

(b) a person who lives near the child's community or language group.

- (7) Before placing the child in the care of a family member or other person who is not an Aboriginal person or Torres Strait Islander, the chief executive must give proper consideration to whether the person is committed to—
- (a) facilitating contact between the child and the child's parents and other family members, subject to any limitations on the contact under section 87; and
  - (b) helping the child to maintain contact with the child's community or language group; and
  - (c) helping the child to maintain a connection with the child's Aboriginal or Torres Strait Islander culture; and
  - (d) preserving and enhancing the child's sense of Aboriginal or Torres Strait Islander identity.

## 1.4 Commission's legislated role to monitor compliance

The Commission has a legislated oversight role in relation to monitoring and auditing the Department of Communities' compliance with section 83 of the *Child Protection Act 1999*.

In January 2004, the Crime and Misconduct Commission report *Protecting Children: An inquiry into abuse of children in foster care* stated:

*The Child Placement Principle constitutes a fundamental recognition of the important and unique aspects of Indigenous culture. Giving effect to this recognition is central to a viable child protection service.*<sup>5</sup>

To strengthen oversight of this important aspect of child protection services, the Crime and Misconduct Commission made a recommendation "that Department of Child Safety's compliance with the Indigenous Child Placement Principle be periodically audited and reported on by the Child Guardian."<sup>6</sup>

This recommendation was embedded in section 18(1)(c)<sup>7</sup> of the *Commission for Children and Young People and Child Guardian Act 2000* (the Commission's Act), which requires the Commission "to monitor compliance by the chief executive (child safety) with the *Child Protection Act 1999*, section 83."

Chapter 3 of the Commission's Act enables the Commission, in performing its monitoring functions, to form views and make recommendations for improvement in relation to case-specific and systemic issues and refer such recommendations to the service provider and the relevant Minister. Accordingly, the inaugural *Indigenous Child Placement Principle Audit Report 2008* and the current *Indigenous Child Placement Principle Audit Report 2010* give effect to the Commission's legislative role to monitor compliance with section 83 of the *Child Protection Act 1999*.

<sup>5</sup> Page 235 of *Protecting Children: An inquiry into abuse of children in foster care*, Crime and Misconduct Commission, Brisbane, 2004.

<sup>6</sup> Page 234, Recommendation 8.4, of *Protecting Children: An inquiry into abuse of children in foster care*, Crime and Misconduct Commission, Brisbane, 2004.

<sup>7</sup> Formerly section 15AA(1)(c) of the *Commission for Children and Young People and Child Guardian Act 2000*.

### 1.4.1 The inaugural *Indigenous Child Placement Principle Audit Report 2008*

The *Indigenous Child Placement Principle Audit Report 2008* was the Commission's inaugural audit of compliance with section 83 of the *Child Protection Act 1999*. The inaugural report, among other things, was intended to assist in positioning Queensland as the first state able to report on compliance across the requirements of the Indigenous Child Placement Principle, rather than just an administrative count of Indigenous children placed with Indigenous kin or carers.<sup>8</sup>

The inaugural report made 28 recommendations to the former Department of Child Safety to improve compliance with section 83 of the *Child Protection Act 1999*.

The recommendations were targeted at departmental policies, procedures and systems relating to decision making and information capture required by section 83 of the *Child Protection Act 1999*, as limitations had been identified through the Commission's review of these key elements that were considered significant.

The Commission also assessed a snapshot of the former Department of Child Safety's compliance with section 83 of the *Child Protection Act 1999*, relating to a sample of 82 placement decisions involving 28 Aboriginal and Torres Strait Islander children and young people in out-of-home care. This compliance exercise was undertaken based on a review of the information and decisions recorded on the child's case files and enabled a new Compliance Assessment Tool (discussed in further detail in Part B of this report and contained inside the front cover) to be trialled, which views the process of compliance as comprising five key steps.

Findings from this snapshot assessment of compliance revealed that of the 82 placement decisions reviewed, there were no records evidencing compliance with all requirements of section 83 of the *Child Protection Act 1999* in any one case.

Key feedback and learnings from the inaugural audit highlighted the importance of not only monitoring compliance with section 83 of the *Child Protection Act 1999* in future audits, but also monitoring the cultural outcomes experienced by Aboriginal and Torres Strait Islander children and young people placed in out-of-home care.

### 1.4.2 The current *Indigenous Child Placement Principle Audit 2010/11*

The current Indigenous Child Placement Principle Audit 2010/11 was comprised of three key components. These components will be addressed in this report in the below order following a profile of the Aboriginal and Torres Strait Islander children and young people in the child protection system during the reference period for the audit.

A description of the audit methodology is detailed in Appendix 1.

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<sup>8</sup> Public reporting on compliance with the Indigenous Child Placement Principle has historically been administrative in nature, reporting the number of Aboriginal and Torres Strait Islander children and young people placed with Indigenous or kinship carers (an outcome of the decision making process) rather than reporting the number of placement decisions that complied with each requirement of the decision making process.

Part A (Chapter 2) Mechanisms supporting compliance	This component relates to monitoring the Department of Communities' <b>mechanisms supporting compliance</b> with section 83 of the <i>Child Protection Act 1999</i> (the policies, procedures and record keeping infrastructure in place), based on an evaluation of implementation of the 28 recommendations made in the inaugural (2008) audit.
Part B (Chapter 3) Practice compliance	This component relates to monitoring the Department of Communities' <b>practice compliance</b> with section 83 of the <i>Child Protection Act 1999</i> , based on an assessment of its electronic records and surveys of the Child Safety Officers and Recognised Entities involved in the 388 placement decisions from 2008/09 that comprise the audit sample.
Part C (Chapter 4) Outcomes achieved	This component relates to monitoring the <b>outcomes achieved</b> for children and young people in out-of-home care, relevant to their connection to family, community and culture as a result of the Department of Communities' placement decisions.

The audit was informed and guided by an Advisory Committee of experts in child protection and/or Aboriginal and Torres Strait Islander health and wellbeing. The Advisory Committee was established under Chapter 7 of the Commission's Act to provide a formal and transparent mechanism to allow the Commission to consult with and obtain advice from external experts on key issues relevant to the audit, while at the same time preserving the independence of the Commission's oversight role.

Committee membership was comprised of the Assistant Commissioner for Children and Young People and Child Guardian, as chair, accompanied by representatives from the following key stakeholders to the audit:

- Remote Area Aboriginal and Torres Strait Islander Child Care
- Queensland Aboriginal and Torres Strait Islander Child Protection Peak
- Foster Care Queensland
- Aboriginal and Torres Strait Islander Studies Unit, University of Queensland, and
- Department of Communities.

The committee met on four separate occasions and was consulted periodically out-of-session to provide advice and guide the development and progress of the audit. It was also invited to comment on the development of findings and recommendations in this report.

## Chapter 2

### Profile of Aboriginal and Torres Strait Islander children and young people in the child protection system living away from home

#### Key messages

As at 30 June 2009 (the reference period for this audit):

- The proportion of Aboriginal and Torres Strait Islander children and young people living away from home was 35% (an increase from 26% in 2006), however only 14% of carer families were Indigenous.
- The majority (87%) of Aboriginal and Torres Strait Islander children and young people were placed in home-based care.
- The proportion of Aboriginal and Torres Strait Islander children and young people placed with a kinship or Indigenous carer (administrative count of compliance) was 58.2%, a decrease from 64.1% in 2006.

#### 2.1 The importance of the profile

The profile provides context to the operation of section 83 of the *Child Protection Act 1999*. It does so by highlighting other system-level information regarding Aboriginal and Torres Strait Islander children and young people in the child protection system who were living away from home during the reference period for this audit (2008/09).<sup>9</sup>

In particular, it illustrates the over-representation of Aboriginal and Torres Strait Islander children and young people in the child protection system living away from home, highlighting the importance of compliance with section 83 of the *Child Protection Act 1999* to ensure maintained connection to family, community and culture for this over-represented cohort.

<sup>9</sup> The profile is based on the Department of Communities' administrative data about the child protection system. It looks at Aboriginal and Torres Strait Islander children and young people who are living away from home (all placements) rather than in out-of-home care (foster, kinship, provisional and residential care) to provide a more complete picture of the over-representation of Aboriginal and Torres Strait Islander children in the child protection system.

## 2.2 Profile demographics

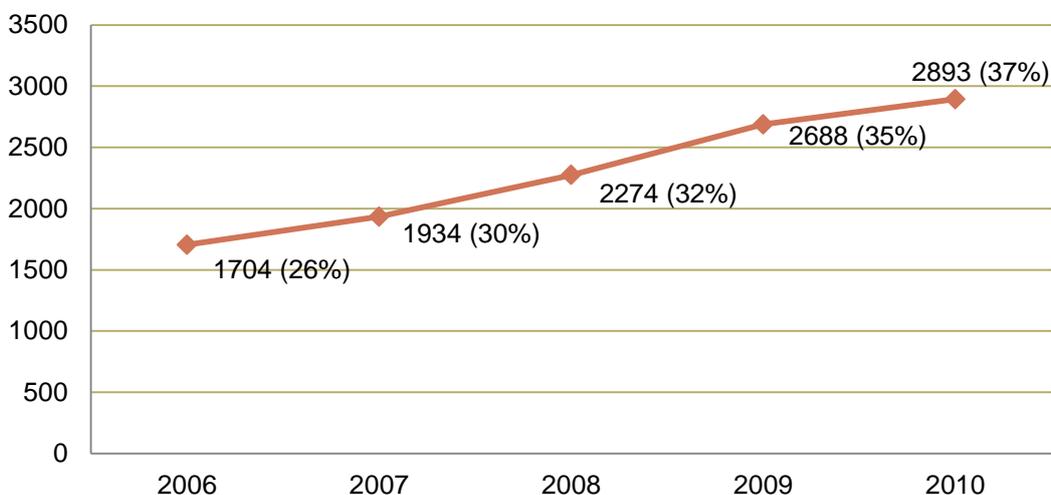
### Aboriginal and Torres Strait Islander children and young people living away from home in Queensland

The Department of Communities defines 'living away from home' as "the provision of care outside the home to children who are in need of protection or who require a safe placement while their protection and safety needs are assessed. Living away from home refers to children in out-of-home care (foster care, approved kinship care, provisionally approved care and residential care services) and other locations such as hospitals, Queensland youth detention centres, independent living as at midnight on the reference day."<sup>10</sup>

In 2009, Aboriginal and Torres Strait Islander children and young people represented 6.5% of all children and young people in Queensland,<sup>11</sup> yet represented 35% of all children and young people in the child protection system who were living away from home.

Figure 1 illustrates the continued increase in the over-representation of Aboriginal and Torres Strait Islander children and young people living away from home over the past five years, from 26% to 37%.

**Figure 1: Proportion of Aboriginal and Torres Strait Islander children and young people living away from home from 2006 to 2010**



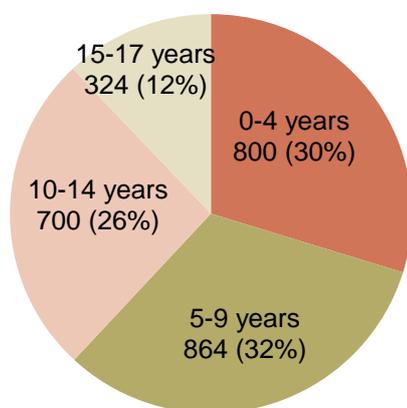
### Age

Figure 2 provides an age breakdown of the 2688 Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009.

<sup>10</sup> <http://www.communities.qld.gov.au/chilfsafety/about-us/our-performance/glossary-of-terms> as at 4 July 2011.

<sup>11</sup> Page 10 of *Snapshot 2010: Children and young people in Queensland*, Commission for Children and Young People and Child Guardian, Brisbane 2010.

**Figure 2: Age breakdown of Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009**



### Gender

Table 3 illustrates an almost even gender breakdown of the 2688 Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009.

**Table 3: Gender breakdown of Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009**

Gender	Number	Percentage
Males	1323	49%
Females	1365	51%
Total	2688	100%

### Order type

Figure 3 illustrates the breakdown of order types for the 2688 Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009.

Child protection orders (CPOs) are court orders issued under the *Child Protection Act 1999* for the protection of children and young people aged up to 17 years inclusive. They are issued when the child is in need of protection and does not have a parent willing and able to protect the child from harm.<sup>12</sup>

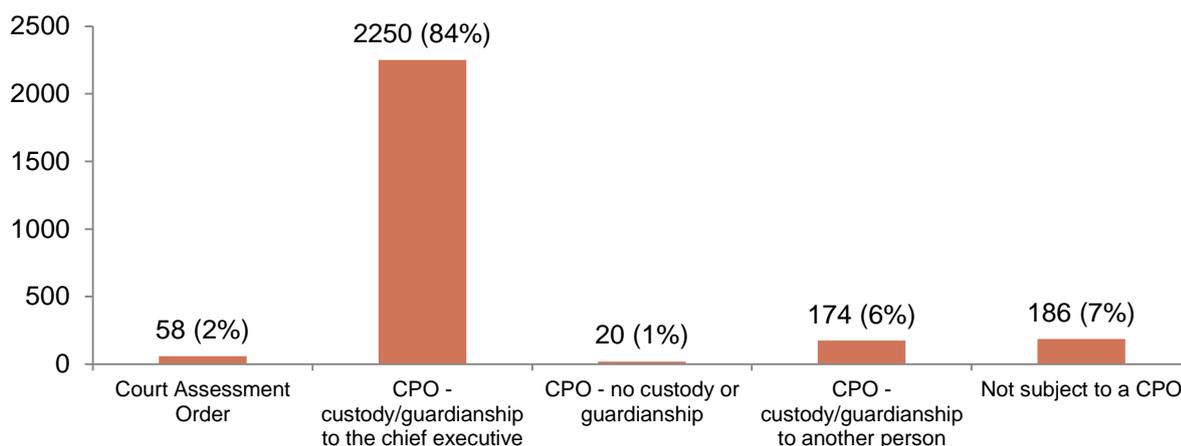
However, “a child protection order is not sought if there are other ways to protect the child, such as working with the consent of the family to resolve the problems that led to harm or risk of harm, or connecting the family to a community support agency.”<sup>13</sup>

<sup>12</sup> Part 3 of the *Child Protection Act 1999*.

<sup>13</sup> <http://www.communities.qld.gov.au/childsafety/about-us/our-performance/summary-statistics/child-protection-orders> as at 4 July 2011.

The majority (84%) of children and young people living away from home were under a child protection order with custody or guardianship to the Chief Executive. This represents the cohort of Aboriginal and Torres Strait Islander children and young people to whom section 83 of the *Child Protection Act 1999* specifically applies.

**Figure 3: Breakdown of order type for Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009**



**Placement type** Figure 4 illustrates the placement breakdown for the 2688 Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009.

Placement types can be broken down into two main categories:

- Home-based care – foster care, kinship care and provisionally approved care, and
- Non-home based care - residential care and other care services (hospitals, Queensland youth detention centres, independent living and all other placements).

The majority (87%) of Aboriginal and Torres Strait Islander children and young people were placed in home-based care, approximately one third of which were placed with kin (32%).<sup>14</sup>

<sup>14</sup> Placed with kin includes children living with a kinship carer, and children living with a foster carer or provisionally approved carer where a family relationship exists between the carer and child.

**Figure 4: Breakdown of placement type for Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009**

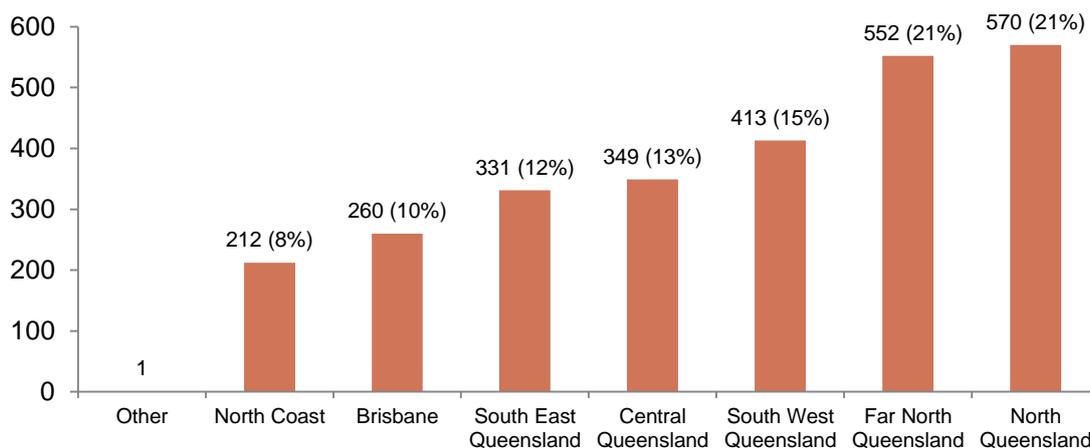


**Regional distribution of children**

Figure 5 illustrates the breakdown of the 2688 Aboriginal and Torres Strait Islander children and young people living away from home by the Department of Communities' Regions as at 30 June 2009.

North Queensland Region and Far North Queensland Region demonstrated the greatest number of Aboriginal and Torres Strait Islander children and young people living away from home.

**Figure 5: Regional distribution of Aboriginal and Torres Strait Islander children and young people living away from home as at 30 June 2009**



**Distribution of children by Child Safety Service Centre**

Table 4 illustrates the breakdown of the 2688 Aboriginal and Torres Strait Islander children and young people living away from home by Child Safety Service Centre as at 30 June 2009.

The Cape York and Torres Strait Islands Child Safety Service Centre demonstrated the highest number of Aboriginal and Torres Strait Islander children and young people living away from home.

**Table 4: Distribution of Aboriginal and Torres Strait Islander children and young people living away from home per Child Safety Service Centre as at 30 June 2009**

Child Safety Service Centre	Number	Percentage
<b>Brisbane Region</b>		
Alderley	11	4
Chermside	22	8
Forest Lake	55	21
Fortitude Valley	26	10
Inala	40	15
Mount Gravatt	28	11
Stones Corner	50	19
Wynnum	28	11
<b>Total</b>	<b>260</b>	<b>100</b>
<b>Central Queensland Region</b>		
Bundaberg	25	7
Emerald	12	3
Gladstone	67	19
Maryborough	35	10
Rockhampton North	42	12
Rockhampton South	102	29
South Burnett	66	19
<b>Total</b>	<b>349</b>	<b>100</b>
<b>Far North Queensland Region</b>		
Atherton	110	20
Cairns North	144	26
Cairns South	63	11
Cape York and Torres Strait Islands	206	37
Innisfail	29	5
<b>Total</b>	<b>552</b>	<b>100</b>
<b>North Coast Region</b>		
Caboolture	53	25
Caloundra	23	11
Gympie	38	18
Maroochydore	24	11
Pine Rivers	45	21
Redcliffe	29	14
<b>Total</b>	<b>212</b>	<b>100</b>

<b>North Queensland Region</b>		
Aitkenvale	51	9
Gulf	115	20
Mackay	103	18
Mount Isa	112	20
Thuringowa	84	15
Townsville	105	18
<b>Total</b>	<b>570</b>	<b>100</b>
<b>South East Queensland Region</b>		
Beaudesert	29	9
Beenleigh	45	14
Browns Plains	26	8
Labrador	13	4
Logan and Brisbane West	1	0
Logan Central	33	10
Loganlea	52	16
Mermaid Beach	45	14
Nerang	18	5
Redlands	36	11
Woodridge	33	10
<b>Total</b>	<b>331</b>	<b>100</b>
<b>South West Queensland Region</b>		
Goodna	38	9
Ipswich North	97	23
Ipswich South	48	12
Roma	45	11
Toowoomba North	116	28
Toowoomba South	69	17
<b>Total</b>	<b>413</b>	<b>100</b>
<b>Other</b>	<b>1</b>	<b>100</b>
<b>State-wide total</b>	<b>2688</b>	<b>100</b>

### **Indigenous carer families**

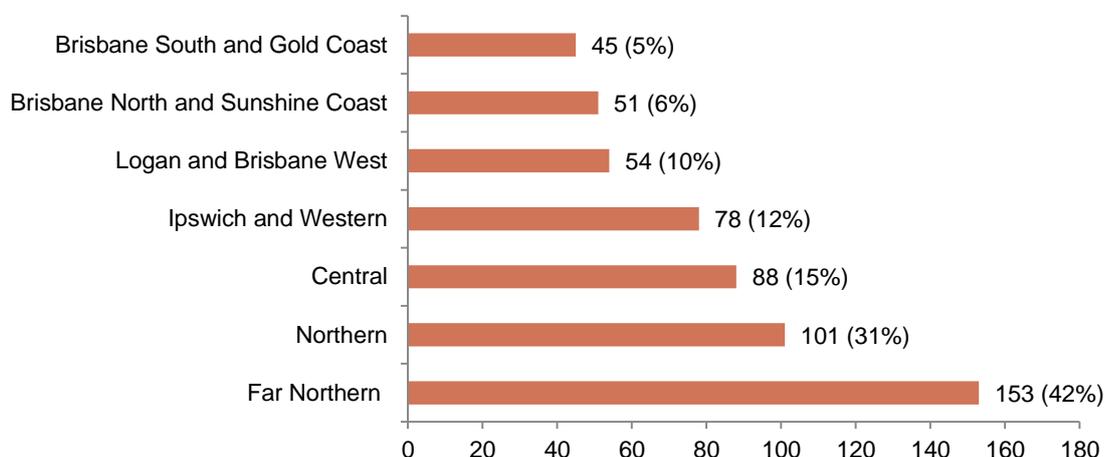
There were 570 carer families where at least one or more carers in the family identified as Aboriginal and/or Torres Strait Islander as at 30 June 2009, representing 14% of all (4082) carer families. Of these:

- 235 (41%) were foster carers
- 234 (41%) were kinship carers, and
- 101 (18%) were provisionally approved carers.

This averages one Indigenous carer family for every four Aboriginal and Torres Strait Islander children and young people.

Figure 6 illustrates the Regional breakdown of Indigenous carer families. In Far Northern Region, Indigenous carer families represent 42% of all carer families.<sup>15</sup>

**Figure 6: Regional distribution of Indigenous carer families as at 30 June 2009**



## 2.3 Administrative compliance with section 83 of the *Child Protection Act 1999*

### Administrative compliance

Public reporting on compliance with the Indigenous Child Placement Principle has historically been administrative in nature, reporting the number of Aboriginal and Torres Strait Islander children and young people placed with Indigenous or kinship carers.

The Commission does not consider the proportion of Aboriginal and Torres Strait Islander children and young people placed with Indigenous or kinship carers to be a complete record of compliance with the Indigenous Child Placement Principle (as prescribed in section 83 of the *Child Protection Act 1999*). Rather, this represents a separate and distinct administrative measure that reports on the outcome of the decision making process, contrasted to reporting the number of placement decisions that complied with all requirements of the decision making process prescribed in section 83 of the *Child Protection Act 1999*.

### Administrative compliance in Queensland in 2009

Table 5 illustrates the breakdown of Aboriginal and Torres Strait Islander children and young people in out-of-home care in 2009, by Indigenous status and relationship of carer.<sup>16</sup> It shows that the proportion of Aboriginal and Torres Strait Islander children and young people in out-of-home care placed with a kinship or Indigenous carer (administrative measure of compliance) was 58.2%.

<sup>15</sup> It was not possible to compare the number of Aboriginal and Torres Strait Islander children and young people to Indigenous carer families for each Department of Communities Region, as carer families have been broken down by former Department of Communities Zones and children have been broken down by the new Department of Communities Regions.

<sup>16</sup> This measure of administrative compliance is based on 'out-of-home care' figures and excludes 'other' placements in hospitals, Queensland youth detention centres, independent living and all other placements.

**Table 5: Breakdown of administrative compliance as at 30 June 2009**

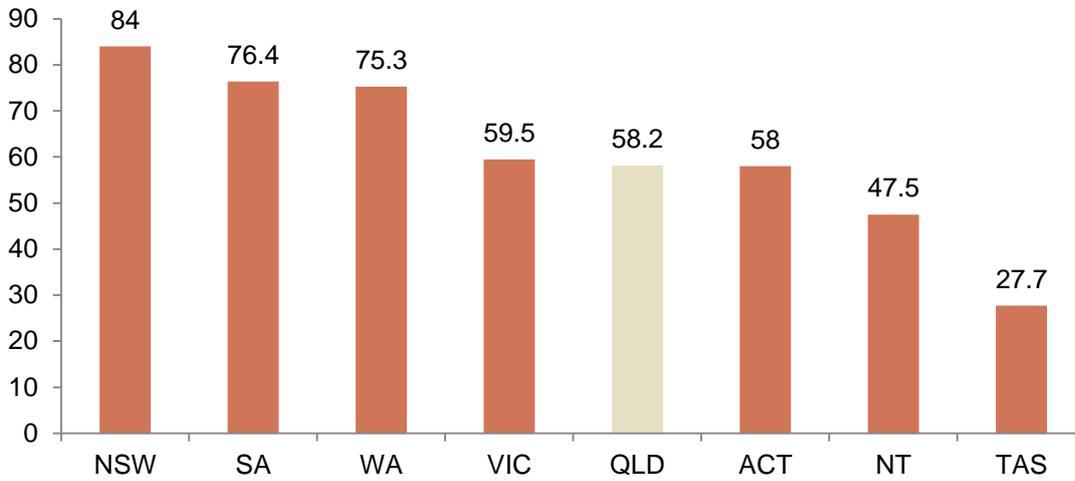
Type of placement	
Number of Indigenous children	Number
<b>Placed with kinship or Indigenous carers</b>	
Indigenous relative/kin	590
Non-Indigenous relative/kin	265
Other Indigenous caregivers	566
Indigenous residential care services	24
Total placed with kinship or Indigenous carers	1445
<b>Not placed with kinship or Indigenous carers</b>	
Other non-Indigenous caregivers	925
In non-Indigenous residential care	111
Total not placed with kinship or Indigenous carers	1036
Total Indigenous children in out-of-home care	2481
As a proportion of all Indigenous children in out-of-home care	Percent
<b>Placed with kinship or Indigenous carers</b>	
Indigenous relative/kin	23.8
Non-Indigenous relative/kin	10.7
Other Indigenous caregivers	22.8
Indigenous residential care services	1.0
Total placed with kinship or Indigenous carers	58.2
<b>Not placed with kinship or Indigenous carers</b>	
Other non-Indigenous caregivers	37.3
In non-Indigenous residential care	4.5
Total not placed with kinship or Indigenous carers	41.8
<b>Total Indigenous children in out-of-home care</b>	<b>100.0</b>

**Administrative compliance in Australian states and territories in 2009**

Figure 7 illustrates the proportion of administrative compliance with the Indigenous Child Placement Principle (as adopted in the relevant legislation) in each Australian state and territory as at 30 June 2009.<sup>17</sup> It shows that Queensland is fifth nation-wide in terms of the proportion of Aboriginal and Torres Strait Islander children and young people placed with an Indigenous or kinship carer.

<sup>17</sup> Page 67 of the *Child Protection Australia 2008-09*, Australian Institute of Health and Welfare, Canberra, 2010.

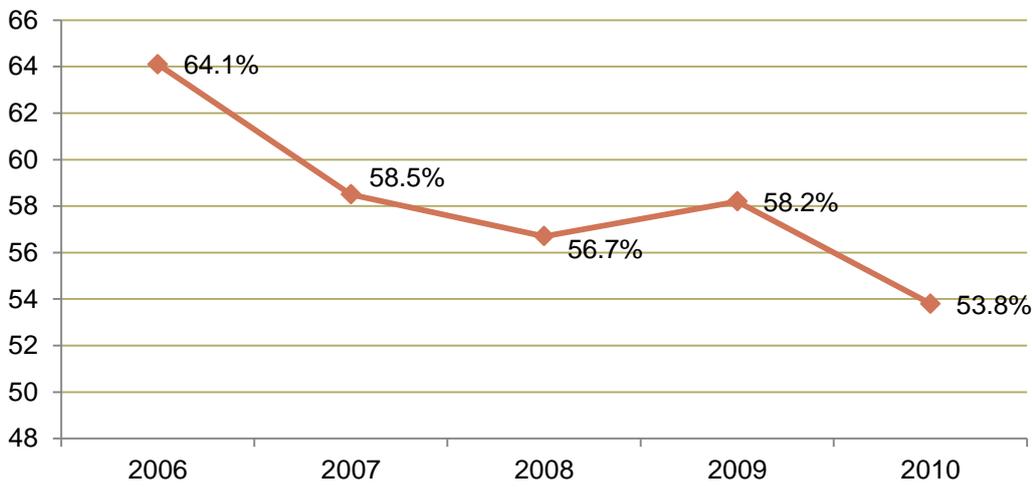
**Figure 7: Proportion of administrative compliance by Australian state and territory as at 30 June 2009**



**Administrative compliance in Queensland in the last five years**

Figure 8 illustrates the proportion of administrative compliance with section 83 of the *Child Protection Act 1999* in Queensland over time. It shows a decline of more than 10% in the proportion of Aboriginal and Torres Strait Islander children and young people placed with Indigenous or kinship carers over the last five years.

**Figure 8: Administrative compliance in Queensland from 2006 to 2010**



# Chapter 3

## Part A - The Department of Communities' mechanisms supporting compliance with section 83 of the *Child Protection Act 1999*

### Key messages

- Overall, the Department of Communities has implemented 19 of the 28 recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008* to improve the mechanisms supporting compliance with section 83 of the *Child Protection Act 1999* (policies, procedures and record keeping).
- All 15 recommendations intended to enhance the Department of Communities' policies and procedures to support compliance with section 83 of the *Child Protection Act 1999* have been implemented.
- Three of the 11 recommendations intended to enhance the Department of Communities' record keeping in ICMS to support compliance with section 83 of the *Child Protection Act 1999* have been implemented. Implementation of the remaining eight ICMS related recommendations is underway with enhancements scheduled for production in March 2012.
- One recommendation related to the Department of Communities rolling out comprehensive training for Child Safety Officers following the implementation of all of the Commission's recommendations is currently being implemented with completion scheduled for April 2012.
- One recommendation related to the Department of Communities considering the creation of specialist positions to assist in placements for Aboriginal and Torres Strait Islander children and young people has been implemented.

### 3.1 Importance of monitoring the Department of Communities' implementation of the 28 inaugural recommendations

The 28 recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008* proposed a series of improvements to the Department of Communities' policy, procedural and record keeping infrastructure to assist Child Safety Officers to comply with section 83 of the *Child Protection Act 1999*.

Through the audit the 28 inaugural recommendations were confirmed as relevant in terms of the mechanisms to support compliance with section 83 of the *Child Protection Act 1999*.

## 3.2 Implementation of the 28 inaugural recommendations

The Department of Communities has provided updates to the Commission on the implementation of the 28 inaugural recommendations and these updates were shared with the Advisory Committee. The most recent update provided a summary of the action taken by the Department of Communities against each recommendation and included documentary evidence of implementation where relevant. This information has been summarised in Appendix 2, which also provides a comprehensive breakdown of the Commission's evaluation of the Department of Communities' implementation of the 28 inaugural recommendations.

The Advisory Committee considered the information and materials provided by the Department of Communities at its fourth meeting on 15 March 2011 and provided advice to the Commissioner regarding its assessment of implementation.

The Advisory Committee members were satisfied that the Department of Communities had implemented all policy/procedural related recommendations and that adequate policies and procedures were in place to support Child Safety Officers in the application of section 83 of the *Child Protection Act 1999*. However, it was established that there was still some way to go in terms of implementing recommendations related to enhancing record keeping functionality in ICMS, with a majority of ICMS related recommendations found to be outstanding.

Informed by this advice, the Commission made a provisional recommendation to the Department of Communities to address this issue:

*If the Department of Communities is unable to commit to a timeframe for implementing the recommendations made in the inaugural Indigenous Child Placement Principle Audit Report 2008 that remain outstanding, particularly the enhancements to ICMS to improve mandatory record keeping in relation to the application of section 83 of the Child Protection Act 1999, it must identify (within three months) another mandatory recording keeping process to enable it to monitor and manage its compliance with each of the five steps.*

The Department of Communities responded that further work had been undertaken in prioritising and planning the implementation of the outstanding inaugural recommendations since the Commission's assessment of implementation:

*Enhancements to ICMS, relevant to the implementation of recommendations from the Indigenous Child Placement Principle Audit Report 2008, are scheduled to enter production in March 2012.*

The Department of Communities also provided revised information about the additional action taken against each outstanding recommendation (summarised in Appendix 2) and included documentary evidence of implementation where relevant. This advice and evidence indicated that the Department of Communities has prioritised and planned the ICMS enhancements proposed by the recommendations and has nominated a timeframe for implementation.

Based on the Department of Communities' updates, and the Advisory Committee's advice on the extent of implementation, the Commission has concluded that all of the inaugural recommendations that relate to enhancing the guidance contained in departmental policies and procedures to support compliance with section 83 of the *Child Protection Act 1999* have been implemented. However, implementation is still underway for the majority of recommendations that

relate to enhancing information capture in ICMS to support compliance with section 83 of the *Child Protection Act 1999*. Specifically, the Commission makes the following assessment.

**Implementation status of the 28 inaugural recommendations**

- The Department of Communities has implemented 19 of the 28 recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008* to improve the mechanisms for compliance with section 83 of the *Child Protection Act 1999* (the policies, procedures and record keeping infrastructure in place).
- All 15 recommendations intended to enhance the Department of Communities' policies and procedures to support compliance with section 83 of the *Child Protection Act 1999* have been implemented.
- Three of the 11 recommendations intended to enhance the Department of Communities' record keeping in ICMS to support compliance with section 83 of the *Child Protection Act 1999* have been implemented. Implementation of the remaining eight ICMS related recommendations is underway with enhancements scheduled for production in March 2012.
- One recommendation related to the Department of Communities rolling out comprehensive training for Child Safety Officers following the implementation of all of the Commission's recommendations is currently being implemented with completion scheduled for April 2012.
- One recommendation related to the Department of Communities considering the creation of specialist positions to assist in placements for Aboriginal and Torres Strait Islander children and young people has been implemented.

Table 6 provides a summary of the Commission's assessment of the Department of Communities' implementation of the 28 inaugural recommendations and highlights the nature of each recommendation made and its implementation status.

Importantly, many of the 28 inaugural recommendations made by the Commission were reinforced by recommendations made in the Aboriginal and Torres Strait Islander Kinship Reconnection Project report in 2010, prepared by the Placements for Aboriginal and Torres Strait Islander Working Group (Appendix 4 provides an overview of the links between recommendations). The aim of that Project was to improve kinship connections for the 26 children and young people comprising the Project sample and identify practice improvements and models of service delivery to better connect them to their family, community and culture.

The Project report similarly made recommendations proposing the Department of Communities enhance guidance to assist Child Safety Officers in the application of section 83 of the *Child Protection Act 1999*. Specifically, recommendations related to establishing cultural identity, identifying and recording family and cultural information, and considering and making placement decisions in accordance with section 83 of the *Child Protection Act 1999*.

The Project report also identified that the steps taken to identify a culturally appropriate placement in line with section 83 of the *Child Protection Act 1999*, and the outcomes of these steps, were not clearly documented, with recommendations made to enhance the Department of Communities' record keeping.

Accordingly, this audit has concluded that the inaugural recommendations remain relevant. As such, it is essential that the Department of Communities adhere to its nominated timeframes for the inaugural recommendations that are currently being implemented (particularly the enhancements to ICMS to improve mandatory record keeping), or establish another mandatory record keeping process to enable it to better monitor and manage its compliance with section 83 within three months.

### Recommendation 1

The Department of Communities adhere to the nominated timeframes assigned to the nine recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008* that are currently being implemented, or establish (by the end of April 2012) another mandatory recording keeping process to enable it to monitor and manage compliance with each of the five steps.

**Table 6: Summary of the Commission's evaluation of the Department of Communities' implementation of the 28 inaugural recommendations**

Rec.	Policy/procedural related	Record keeping (in ICMS) related	Other	Status
1	Yes	-	-	Implemented
2	Yes	-	-	Implemented
3	Yes	-	-	Implemented
4	-	Yes	-	Implementation underway
5	Yes	-	-	Implemented
6	Yes	-	-	Implemented
7	Yes	-	-	Implemented
8	-	Yes	-	Implemented
9	Yes	-	-	Implemented
10	-	Yes	-	Implementation underway
11	Yes	-	-	Implemented
12	-	Yes	-	Implemented
13	-	Yes	-	Implementation underway
14	Yes	-	-	Implemented
15	-	Yes	-	Implementation underway
16	Yes	-	-	Implemented
17	-	Yes	-	Implementation underway
18	Yes	-	-	Implemented
19	-	Yes	-	Implemented
20	Yes	-	-	Implemented

21	-	Yes	-	Implementation underway
22	Yes	-	-	Implemented
23	Yes	-	-	Implemented
24		Yes	-	Implementation underway
25	Yes	-	-	Implemented
26	-	-	Training related	Implementation underway
27	-	-	Position creation related	Implemented
28	-	Yes	-	Implementation underway
<b>Total</b>	<b>15</b>	<b>11</b>	<b>2</b>	<b>28</b>
<b>Total implemented</b>	<b>15</b>	<b>3</b>	<b>1</b>	<b>19</b>

# Chapter 4

## Part B - The Department of Communities' practice compliance with section 83 of the *Child Protection Act 1999*

### Key messages

- The Department of Communities' practice compliance with most of the individual steps required by section 83 of the *Child Protection Act 1999* was identified as positive, where evidence was available to make an assessment against the Compliance Assessment Tool.<sup>18</sup>
- Complete compliance with all steps of the Compliance Assessment Tool was established for 58 (or 15%) of the 388 placement decisions comprising the audit sample. This represents an improvement since the inaugural *Indigenous Child Placement Principle Audit Report 2008* which found no record of complete compliance with section 83 of the *Child Protection Act 1999* (across a smaller sample).
- While compliance with individual steps of the Compliance Assessment Tool was good when viewed in isolation, the Department of Communities needs to improve compliance with all steps to improve complete compliance.
- The low outcome of complete compliance can be attributed in part to delays in the Department of Communities implementing the recommendations of the inaugural audit.
- There is a need for strengthened training to improve practice compliance with section 83 of the *Child Protection Act 1999* and the outcomes of this audit should assist staff in understanding the importance of the issue.

### 4.1 Importance of monitoring the Department of Communities' compliance with section 83 of the *Child Protection Act 1999*

The Commission's mandate to monitor the Department of Communities' compliance with section 83 of the *Child Protection Act 1999* is integral to maintaining a focus on this important area of service delivery. Identifying areas of strength or areas requiring improvement in terms of practice compliance with section 83, also supports departmental efforts to improve outcomes for Aboriginal and Torres Strait Islander children and young people in out-of-home care.

Appropriate record keeping should provide critical insights of both the outcome of a placement decision for an Aboriginal and Torres Strait Islander child or young person, and the process and rationale behind the decision. Without evidence of how each step required by section 83 of the *Child Protection Act 1999* is applied to the decision making process for a placement, compliance cannot be measured, confirmed or said to have occurred.

<sup>18</sup> A tool that summarises the key requirements of section 83 of the *Child Protection Act 1999* and was endorsed by the Advisory Committee as the framework for assessing compliance for this audit.

## 4.2 Process for assessing compliance

Information was triangulated from three data sources used to inform the audit (Child Safety Officer surveys, Recognised Entity surveys and ICMS records).<sup>19</sup> This information was used to determine whether the decision making process undertaken for each of the 388 placement decisions comprising the audit sample was compliant with the five requisite steps of the Compliance Assessment Tool (Appendix 5).

## 4.3 Assessing compliance with each of the five steps of the Compliance Assessment Tool using the three data sources

For each of the 388 placement decisions, an assessment of compliance was made for each step of the Compliance Assessment Tool using the three separate data sources. This resulted in three unique assessments of compliance with each step, one for each data source. The counting rules that were used to inform the application of the Compliance Assessment Tool are outlined in Appendix 5.

The three assessments of compliance were then reconciled to provide an overall assessment of compliance with each step (based on all information available). The counting rules that were used to inform this process are outlined in Appendix 6 and the complete results of this assessment are contained in Appendix 7.

The assessment of compliance with each step of the Compliance Assessment Tool follows. In summary, provided one of the available sources evidenced compliance, this was recorded in the positive, even where a conflicting source existed. In essence, the Department of Communities has been provided with the benefit of the doubt in the assessment process.

### Step 1 – Identify the child is Indigenous

#### Section 83 of the *Child Protection Act 1999*

(1) This section applies if the child is an Aboriginal or Torres Strait Islander child.

#### Threshold for assessing compliance with Step 1

Compliance with section 83(1) of the *Child Protection Act 1999*, Step 1 of the Compliance Assessment Tool, occurs if a child is identified as Aboriginal, Torres Strait Islander or both Aboriginal and Torres Strait Islander.

#### Compliance with Step 1

As illustrated in Figure 9, all of the children and young people who were the subject of the 388 placement decisions comprising the audit sample were identified to be Aboriginal and/or Torres Strait Islander, therefore all placement decisions demonstrated compliance with Step 1 of the Compliance Assessment Tool.<sup>20</sup>

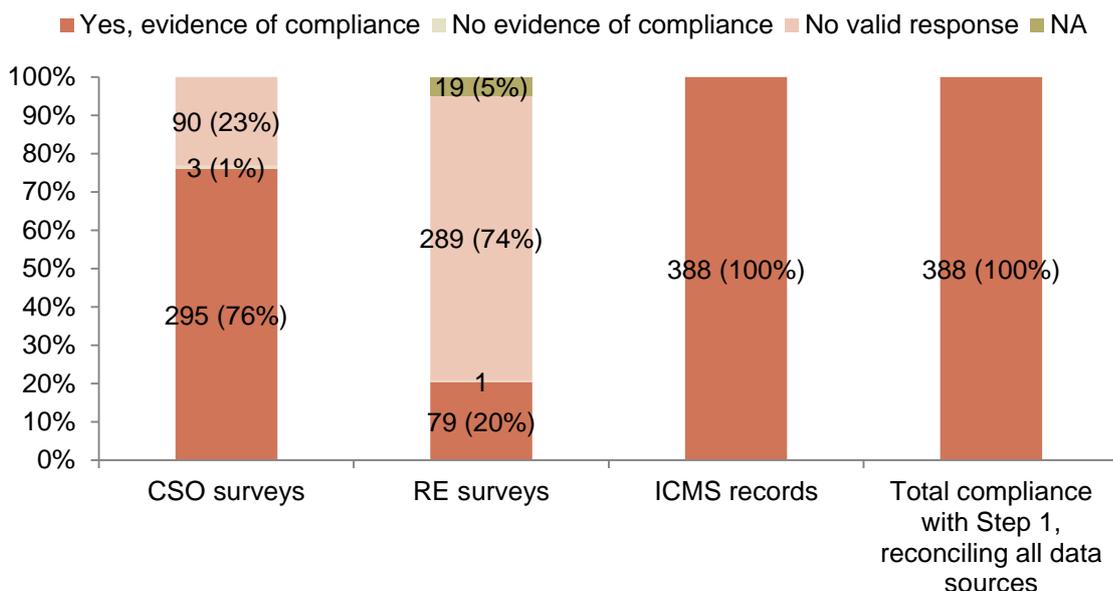
<sup>19</sup> Refer to the Audit Methodology for additional detail about the methodology established for Part B of the audit.

<sup>20</sup> The total figure was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step.

### What this indicates

Strong compliance with Step 1 indicates that the Department of Communities is performing well in identifying the cultural status of Aboriginal and Torres Strait Islander children and young people who come into contact with the child protection system.

**Figure 9: Placement decisions that demonstrated compliance with Step 1 of the Compliance Assessment Tool<sup>21</sup>**



### Step 2 – Involvement of a Recognised Entity

#### Section 83 of the *Child Protection Act 1999*

- (2) The chief executive must ensure a recognised entity for the child is given an opportunity to participate in the process for making a decision about where or with whom the child will live.
- (3) However, if because of urgent circumstances the chief executive makes the decision without the participation of a recognised entity for the child, the chief executive must consult with a recognised entity for the child as soon as practicable after making the decision.

#### Threshold for assessing compliance with Step 2

Compliance with section 83(2) and (3) of the *Child Protection Act 1999*, Step 2 of the Compliance Assessment Tool, occurs where there is evidence that the Recognised Entity was provided an opportunity to participate in the placement decision, or was consulted as soon as practicable after the placement decision was made in urgent circumstances.

<sup>21</sup> Percentages may not add up to 100% owing to rounding.

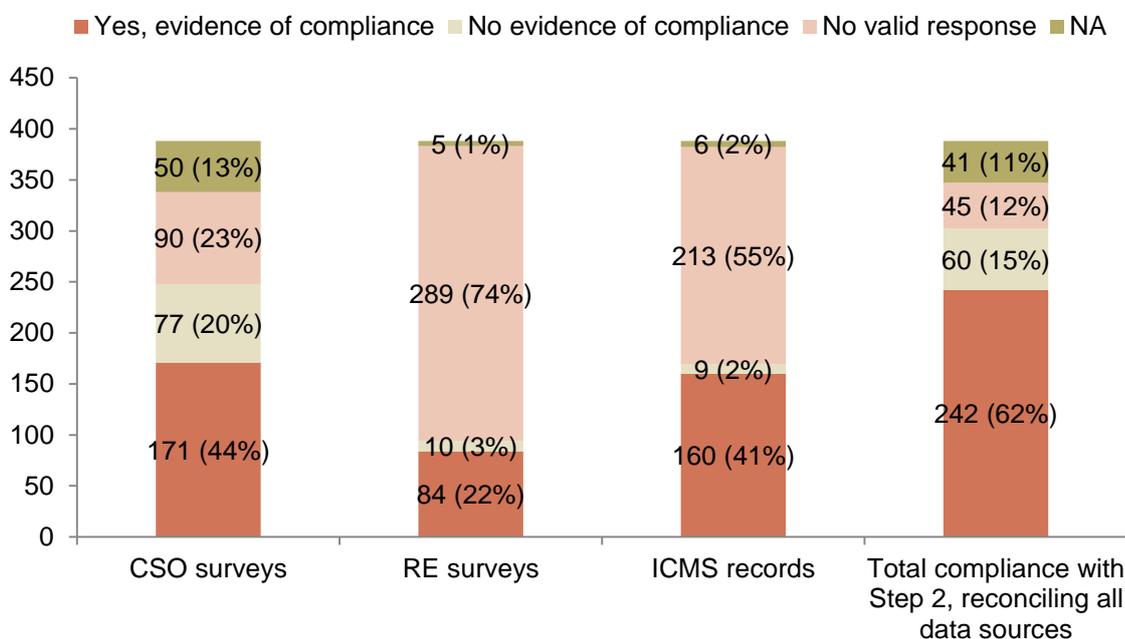
## Compliance with Step 2

As illustrated in Figure 10, 242 (or 62% of 388) placement decisions demonstrated that the Recognised Entity was provided an opportunity to participate in the placement decision, or was consulted as soon as practicable after the placement decision was made in urgent circumstances, therefore demonstrating compliance with Step 2 of the Compliance Assessment Tool in these cases.<sup>22</sup>

## What this indicates

This compliance finding indicates that Child Safety Officers are aware of the need to involve or consult with Recognised Entities. However there is need for improved practice and/or record keeping.

**Figure 10: Placement decisions that demonstrated compliance with Step 2 of the Compliance Assessment Tool<sup>23</sup>**



## Step 3 – Hierarchy of placement options

### Section 83 of the *Child Protection Act 1999*

- (4) In making a decision about the person in whose care the child should be placed, the chief executive must give proper consideration to placing the child, in order of priority, with—
- a member of the child's family; or
  - a member of the child's community or language group; or
  - another Aboriginal person or Torres Strait Islander who is compatible with the child's community or language group; or
  - another Aboriginal person or Torres Strait Islander.

<sup>22</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

<sup>23</sup> Percentages may not add up to 100% owing to rounding.

- (6) If the chief executive decides there is no appropriate person mentioned in subsection (4)(a) to (d) in whose care the child may be placed, the chief executive must give proper consideration to placing the child, in order of priority, with—
- (a) a person who lives near the child’s family; or
  - (b) a person who lives near the child’s community or language group.

### Threshold for assessing compliance with Step 3

Compliance with section (4) and (6) of the *Child Protection Act 1999*, Step 3 of the Compliance Assessment Tool, occurs where there is evidence that each level of the prescribed hierarchy of placement options (outlined above) was considered in order until the placement decision was made.

### Compliance with Step 3

As illustrated in Figure 11:

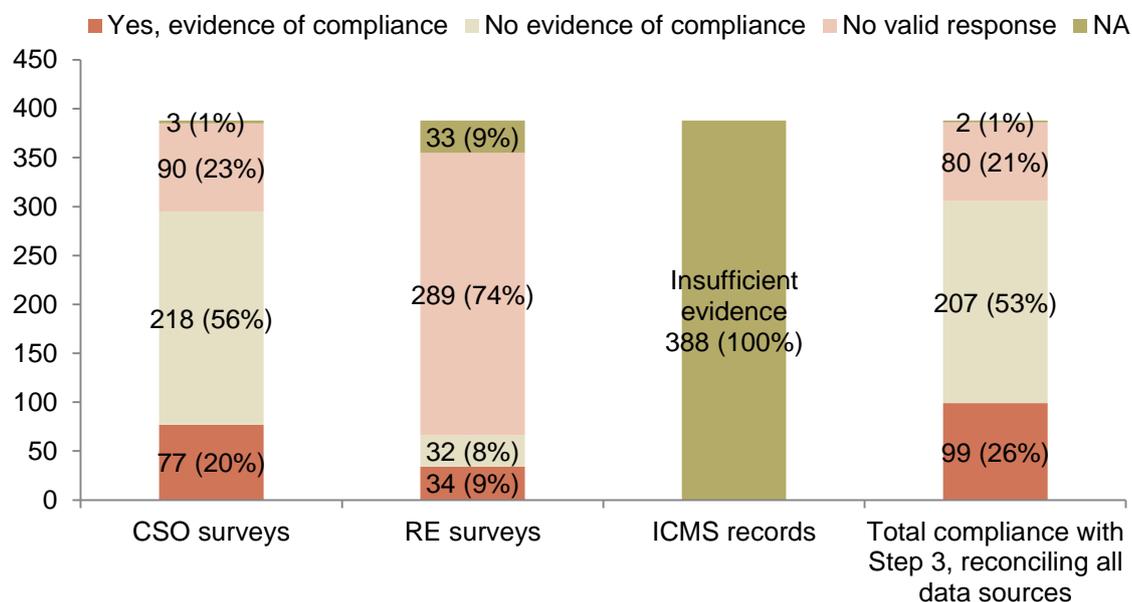
- There were 99 (or 26% of 388) placement decisions that demonstrated that each level of the prescribed hierarchy of placement options was considered in order until the placement decision was made. Therefore demonstrating compliance with Step 3 in these cases.<sup>24</sup>
- ICMS records did not capture sufficient rationale about the identification and consideration of placement options to inform the assessment of compliance with Step 3 at all.

### What this indicates

- This compliance finding indicates that there is need for improved practice and/or record keeping in relation to the identification, consideration and assessment of placement options in accordance with the prescribed hierarchy outlined in section 83(4) and (6) of the *Child Protection Act 1999*.
- The record keeping limitations identified in the inaugural audit and this current audit about monitoring compliance with Step 3 still remain and require action by the Department of Communities.

<sup>24</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

**Figure 11: Placement decisions that demonstrated compliance with Step 3 of the Compliance Assessment Tool<sup>25</sup>**



#### Step 4 – Proper consideration of placement options

##### Section 83 of the *Child Protection Act 1999*

(5) Also, the chief executive must give proper consideration to—

- (a) the views of a recognised entity for the child; and
- (b) ensuring the decision provides for the optimal retention of the child's relationships with parents, siblings and other people of significance under Aboriginal tradition or Island custom.

##### Threshold for assessing compliance with Step 4

For the purposes of this audit, Step 4 of the Compliance Assessment Tool has been further broken down to identify the extent of compliance with the two aspects of this Step:

- Step 4A – Proper consideration of the Recognised Entity's views, and
- Step 4B – Proper consideration of the placement option's ability to ensure optimal retention of relationships with key people.

Compliance with section 83(5) of the *Child Protection Act 1999*, Step 4 of the Compliance Assessment Tool, occurs where there is evidence of:

- Consideration of the Recognised Entity's views (Step 4A), and
- Assessment of a placement option's ability to retain the child's relationships with parents, siblings and people of significance (Step 4B).

<sup>25</sup> Percentages may not add up to 100% owing to rounding.

## Step 4A

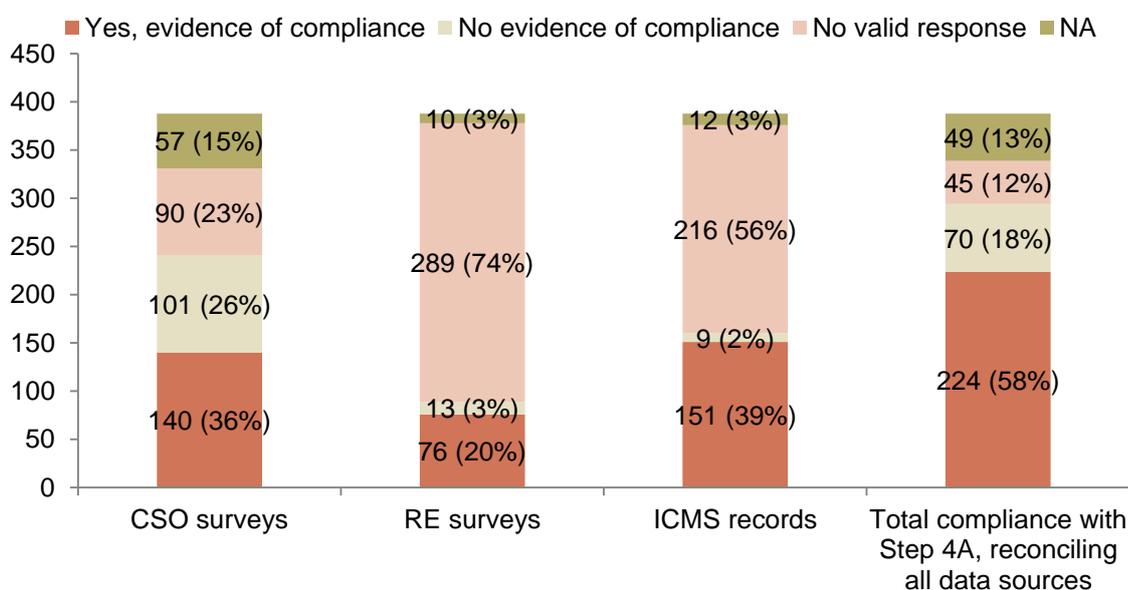
### Compliance with Step 4A

As illustrated in Figure 12, there were 224 (or 58% of 388) placement decisions that demonstrated consideration of the Recognised Entity's views, therefore demonstrating compliance with Step 4A of the Compliance Assessment Tool in these cases.<sup>26</sup>

### What this indicates

This compliance finding indicates that in a large number of placement decisions the Recognised Entity's views are being properly considered by the Department of Communities. However there is need for further improved practice and/or record keeping.

**Figure 12: Placement decisions that demonstrated compliance with Step 4A of the Compliance Assessment Tool<sup>27</sup>**



## Step 4B

### Compliance with Step 4B

- As illustrated in Figure 13, there were 180 (or 46% of 388) placement decisions that demonstrated evidence of an assessment of a placement option's ability to retain the child's relationships with their parents, siblings and people of significance, therefore demonstrating compliance with Step 4B of the Compliance Assessment Tool in these cases.<sup>28</sup>
- Figure 13 further illustrates that ICMS records did not capture sufficient rationale about the assessment of a placement option's ability to retain the child's relationships with their parents, siblings and people of significance to inform the assessment of compliance

<sup>26</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

<sup>27</sup> Percentages may not add up to 100% owing to rounding.

<sup>28</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

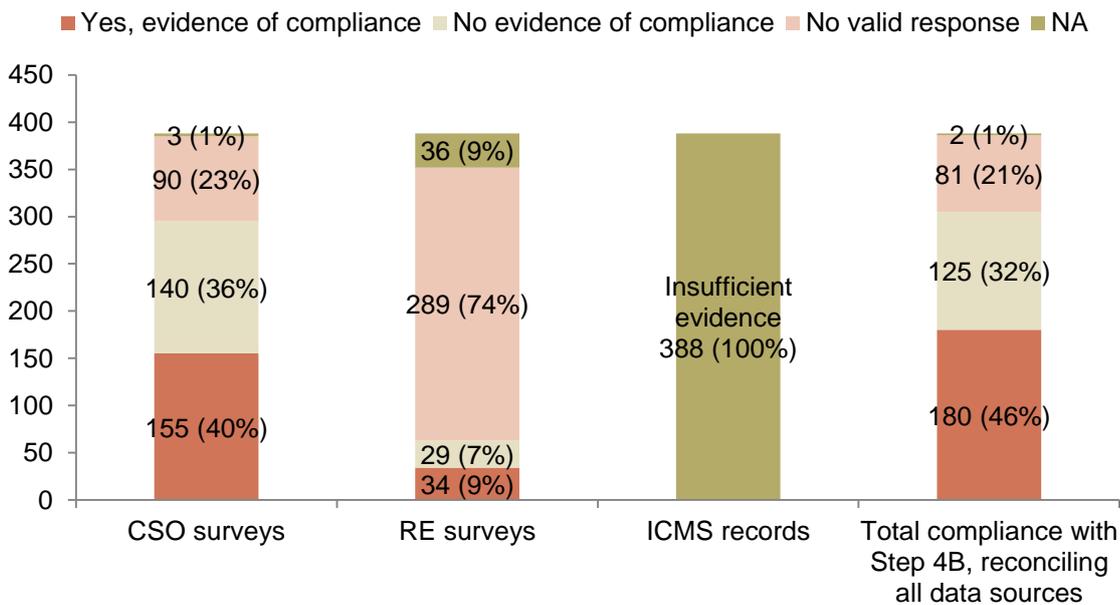
with Step 4B.

- As illustrated in Figure 14, a further breakdown of compliance with Step 4B demonstrated that Child Safety Officers are doing well at assessing the placement option's ability to retain some, but not all, of the child's relationships with family and people of significance (as relevant).<sup>29</sup>

**What this indicates**

- This compliance finding indicates that there is need for improved practice and/or record keeping in regard to assessing a placement option's ability to retain the child's relationships with all (not just some) of their parents, siblings and people of significance (as relevant).<sup>30</sup>
- The record keeping limitations identified in the inaugural audit and this current audit about monitoring compliance with Step 4B still remain and require action by the Department of Communities.

**Figure 13: Placement decisions that demonstrated compliance with Step 4B of the Compliance Assessment Tool<sup>31</sup>**

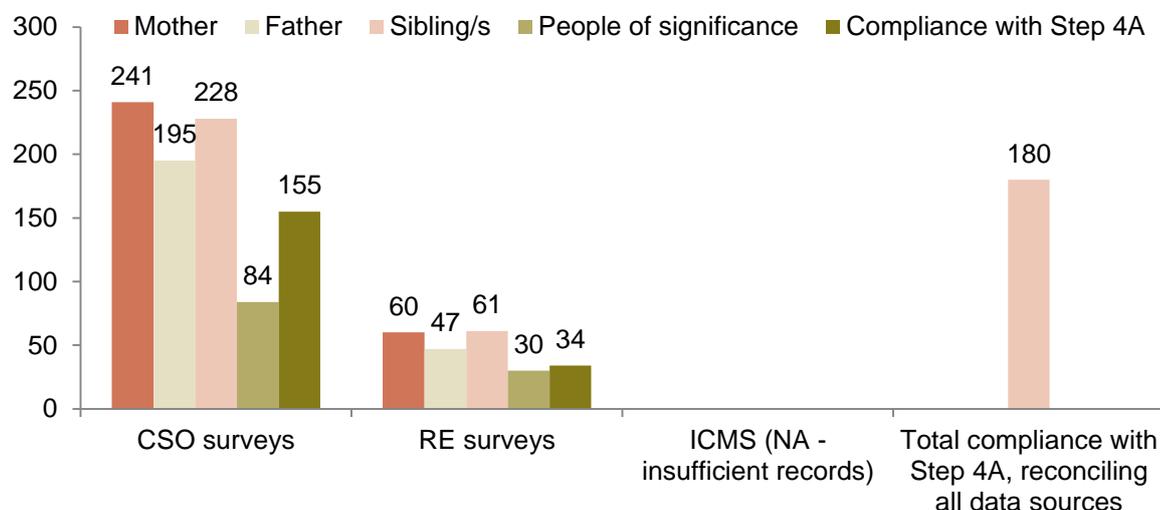


<sup>29</sup> All 'relevant' relationships excludes where consideration of a relationship will not be appropriate ie. where a person is deceased, a father is unknown, the child does not have any siblings etc.

<sup>30</sup> Ibid.

<sup>31</sup> Percentages may not add up to 100% owing to rounding.

**Figure 14: Breakdown of compliance with Step 4B of the Compliance Assessment Tool**



### Step 5 – Assessment of non-Indigenous carer’s commitment

#### Section 83 of the *Child Protection Act 1999*

(7) Before placing the child in the care of a family member or other person who is not an Aboriginal person or Torres Strait Islander, the chief executive must give proper consideration to whether the person is committed to—

- (a) facilitating contact between the child and the child’s parents and other family members, subject to any limitations on the contact under section 87; and
- (b) helping the child to maintain contact with the child’s community or language group; and
- (c) helping the child to maintain a connection with the child’s Aboriginal or Torres Strait Islander culture; and
- (d) preserving and enhancing the child’s sense of Aboriginal or Torres Strait Islander identity.

#### Threshold for assessing compliance with Step 5

Compliance with section 83(7) of the *Child Protection Act 1999*, Step 5 of the Compliance Assessment Tool, occurs where there is evidence of an assessment of the non-Indigenous carer’s commitment to:

- facilitating contact between the child and the child’s parents and other family members
- helping the child to maintain contact with the child’s community or language group
- helping the child to maintain a connection with the child’s Aboriginal or Torres Strait Islander culture, and
- preserving and enhancing the child’s sense of Aboriginal or Torres Strait Islander identity.

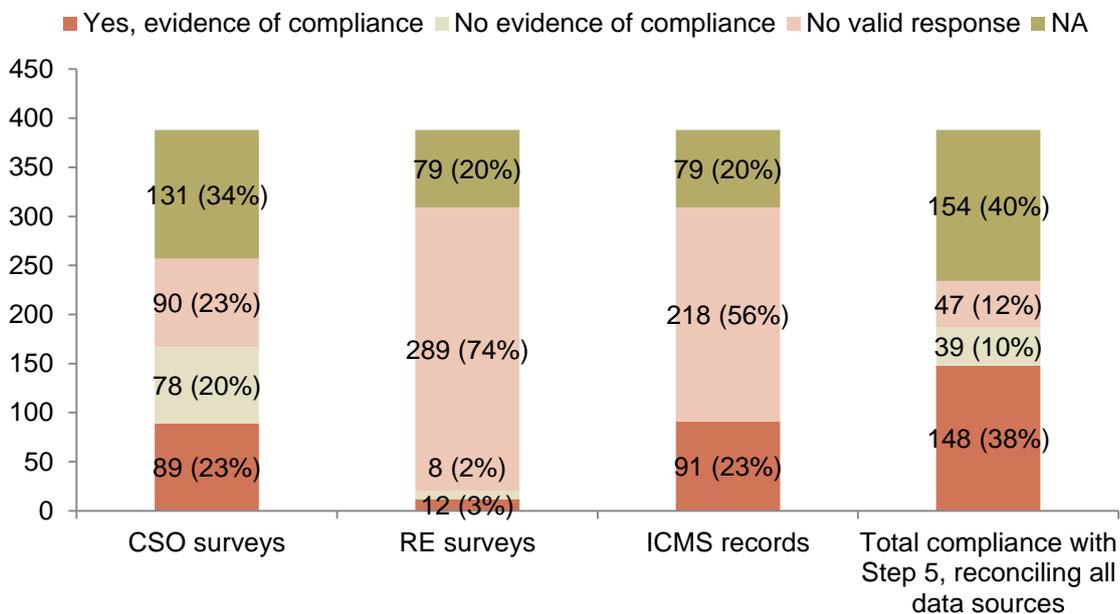
**Compliance with Step 5**

As illustrated in Figure 15, there were 148 (or 38% of 388) placement decisions that demonstrated an assessment of the non-Indigenous carer’s commitment to maintaining the child’s connection to family, community and culture. Therefore, demonstrating compliance with Step 5 of the Compliance Assessment Tool in these cases.<sup>32</sup>

**What this indicates**

This compliance finding indicates that there is need for improved practice and/or record keeping in regard to assessment of the non-Indigenous carer’s commitment to maintaining the child’s connection to family, community and culture.

**Figure 15: Placement decisions that demonstrated compliance with Step 5 of the Compliance Assessment Tool<sup>33</sup>**



<sup>32</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

<sup>33</sup> Percentages may not add up to 100% owing to rounding.

## 4.4 Overall compliance with each step

Overall compliance with each step of the Compliance Assessment Tool has been broken down in two ways:

- (i) For all 388 placement decisions comprising the audit sample,<sup>34</sup> and
- (ii) For the valid placement decisions for each step (ie. excluding the placement decisions that were not applicable for a particular step or had no valid response submitted).

Overall compliance has been broken down this way for completeness to:

- Firstly, provide a picture of compliance for all 388 placement decisions comprising the audit sample, and
- Secondly, formulate a comparative assessment of compliance based on placement decisions that actually had information available to inform an assessment.

### (i) Overall compliance for all 388 placement decisions comprising the audit sample<sup>35</sup>

#### For all 388 placement decisions

- As illustrated in Figure 16, there were varied levels of compliance across the five steps of the Compliance Assessment Tool. However, Step 1 (identifying the child is Indigenous) was the only step in which all of the 388 placement decisions comprising the audit sample demonstrated compliance.<sup>36</sup>
- At least 12% of all placement decisions, excluding Step 1, had no valid response provided across all data sources to inform an assessment of compliance.

#### What this indicates

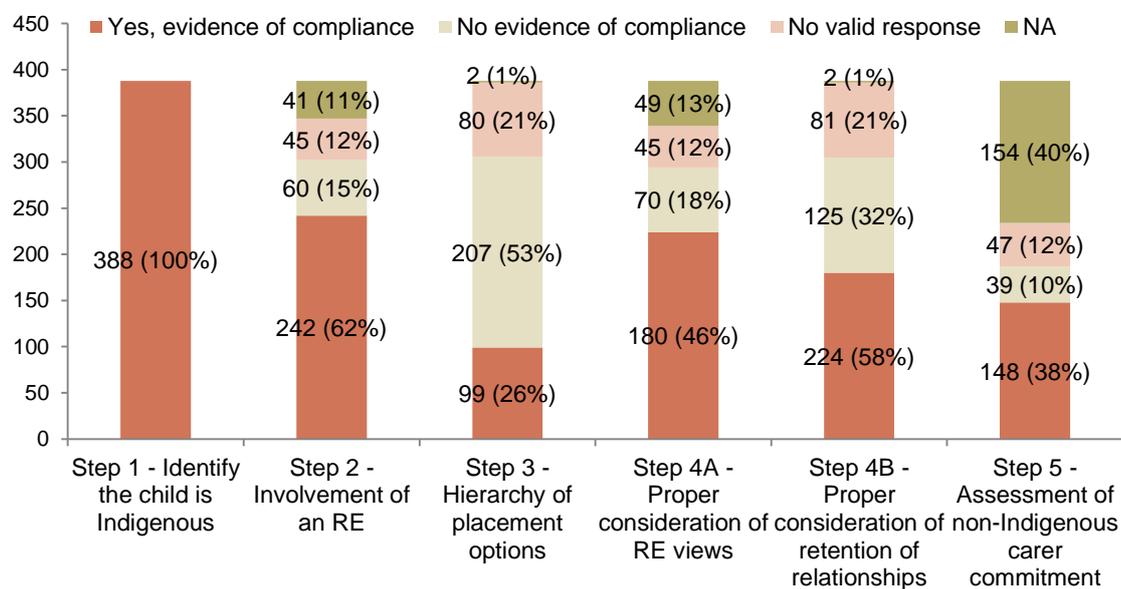
- This compliance finding indicates that there are practice and record keeping issues relevant to compliance with all but one step of the Compliance Assessment Tool, Step 1 – identifying the child is Indigenous.
- The absence of sufficient records for more than 12% of the placement decisions comprising the audit sample limits the Commission's ability to assess the Department of Communities' compliance with the steps required by section 83 of the *Child Protection Act 1999*. It also raises questions about the Department of Communities' ability to make appropriate decisions about service delivery and support gaps.

<sup>34</sup> The 15% compliance referred to throughout this report relates to the assessment of all 388 placement decisions comprising the audit sample, as represented in Figure 16.

<sup>35</sup> The 15% compliance referred to throughout this report relates to the assessment of all 388 placement decisions comprising the audit sample, as represented in Figure 16.

<sup>36</sup> The total figure of compliance was calculated by reconciling the three assessments of compliance with each step (based on each data source) to provide an overall assessment of compliance with each step. This total figure will not evenly add up to the sum of compliance across the three data sources owing to overlap in the placement decisions that a survey response or ICMS record was provided for.

**Figure 16: Placement decisions that demonstrated compliance with each of the five steps of the Compliance Assessment Tool<sup>37</sup>**



**(ii) Overall compliance for all valid placement decisions for each step (excluding the placement decisions that were not applicable for a particular step or had no valid response submitted)**

**For all valid placement decisions**

- As illustrated in Figure 17, an assessment of compliance based on all valid placement decisions for each step<sup>38</sup> indicated that strong compliance findings were evident across most steps of the Compliance Assessment Tool where the step was applicable and evidence was available to inform an assessment of compliance.
- Comparatively, Figure 17 (based on all valid placement decisions) indicates stronger findings of compliance across each step compared to Figure 16 (based on all 388 placement decisions).

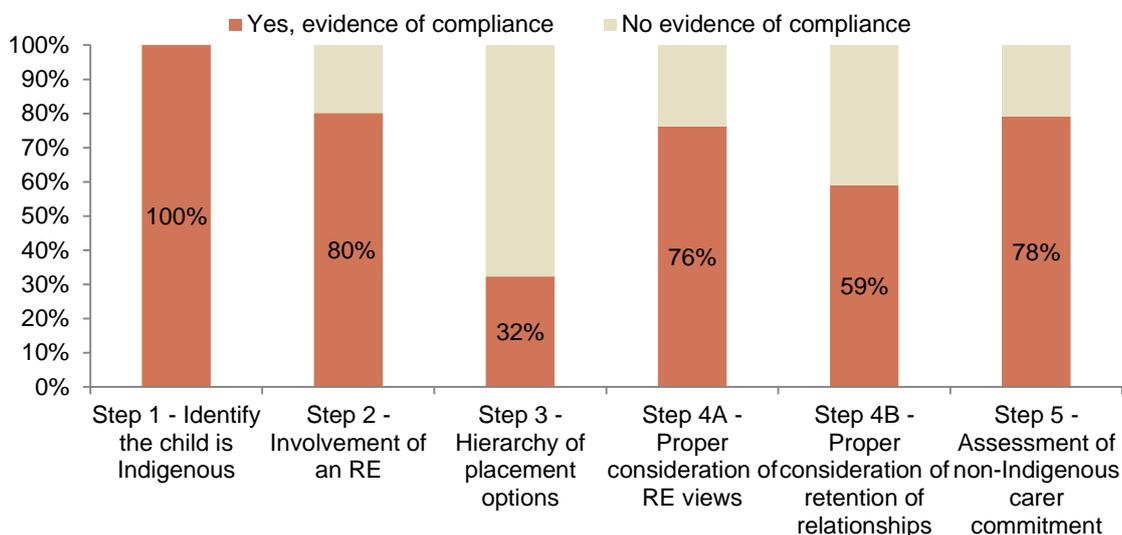
**What this indicates**

- Figure 17 indicates that Child Safety Officers are doing well in complying with most steps of the Compliance Assessment Tool, where evidence is available to inform an assessment. However, there remains a need for improved practice and/or record keeping across all but one step, Step 1.
- The contrast in findings of compliance between Figures 16 and 17 confirms that poor record keeping of compliance with the steps required by section 83 of the *Child Protection Act 1999* leads to a poor assessment of compliance, owing to an absence of evidence that the appropriate decision-making process has been followed. This again highlights the importance of implementing improved record keeping practices to strengthen the assessment of compliance.

<sup>37</sup> Percentages may not add up to 100% owing to rounding.

<sup>38</sup> Excluding the placement decisions from Figure 16 that were not applicable for a particular step or had no valid response submitted.

**Figure 17: Placement decisions that demonstrated compliance with each of the five steps of the Compliance Assessment Tool as a proportion of total valid responses**



## 4.5 Assessing complete compliance across all steps of the Compliance Assessment Tool

The overall assessments of compliance with each step of the Compliance Assessment Tool were drawn together to make a final assessment of complete compliance with section 83 of the *Child Protection Act 1999* for each of the 388 placement decisions comprising the audit sample.

The counting rules used were as follows:

- Yes – there was evidence of complete compliance across all steps of the Compliance Assessment Tool.
- No – there was no evidence of complete compliance across all steps of the Compliance Assessment Tool (based on the information sources available). This may not infer that compliance did not occur, but that there was no record of it.
- No valid response – there was insufficient evidence for one or more steps of the Compliance Assessment Tool, therefore a final assessment of complete compliance could not be made.

### Complete compliance

As illustrated in Figure 18:

- Complete compliance was established for 58 (or 15%) of the placement decisions.
- There were 255 (or 66%) placement decisions that did not evidence complete compliance.
- A final assessment of complete compliance could not be made for 75 (or 19%) placement decisions owing to insufficient evidence.

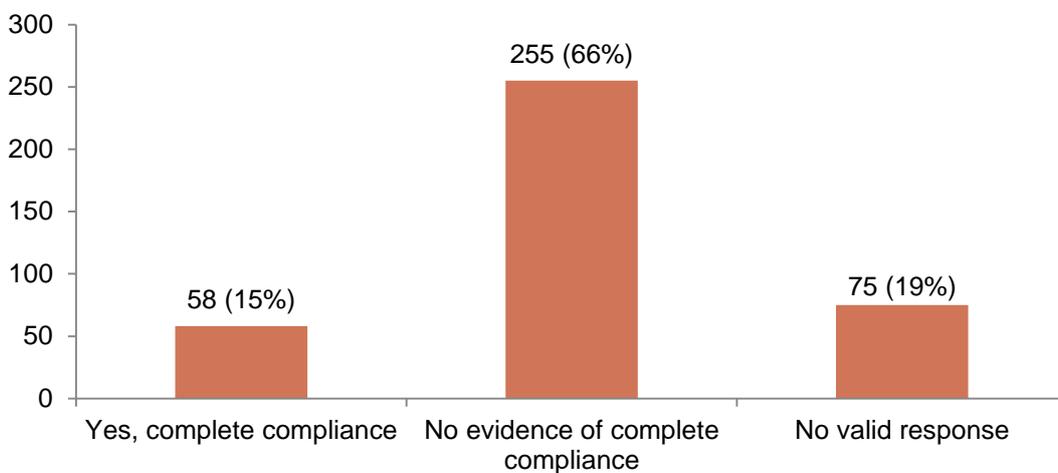
### What this indicates

- This compliance finding indicates an improvement since the inaugural *Indigenous Child Placement Principle Audit Report 2008*

which found no record of complete compliance with section 83 of the *Child Protection Act 1999* (across a small sample).

- It suggests that while compliance with individual steps of the Compliance Assessment Tool is good when viewed in isolation (Figure 17), Child Safety Officers need to improve recording compliance with all steps to achieve complete compliance (Figure 18).
- There is need for further improvement to practice and/or record keeping by the Department of Communities to achieve complete compliance with section 83 of the *Child Protection Act 1999*.

**Figure 18: Final assessment of complete compliance with section 83 of the *Child Protection Act 1999*<sup>39</sup>**



## 4.6 Impact on compliance findings

It is important to note that the policy and procedural recommendations from the inaugural *Indigenous Child Placement Principle Audit Report 2008* have recently been implemented. During the audit, it was identified that these recommendations were predominantly not implemented at the time the audit sample was extracted and analysed.

In the absence of complete implementation of the inaugural recommendations, additional recommendations will not be made to address previously identified issues. The Commission will evaluate the adequacy of implementation of the complete suite of inaugural recommendations as part of the next audit.

### Recommendation 2

The Department of Communities consider ways to strengthen its practice and record keeping related to the application of section 83 of the *Child Protection Act 1999* by communicating the findings of this audit and the Compliance Assessment Tool to its Child Safety Officers as the basis upon which its future efforts will be assessed. A documented communication plan is to be developed by the end of April 2012.

<sup>39</sup> Percentages may not add up to 100% owing to rounding.

### The Department of Communities' response to the recommendation

Accepted.

## 4.7 Key findings

A number of key findings were evident in the assessment of compliance with section 83 of the *Child Protection Act 1999*. Specific recommendations have been made where relevant to address these newly identified issues.

### Availability of necessary ICMS records

The 'Recognised Entity/Child Placement Principle' ICMS form was provided for 173 placement decisions (or 45% of 388). This form was understood by the Commission to be mandatory when a placement decision is made for an Aboriginal or Torres Strait Islander child or young person to capture information about compliance with section 83 of the *Child Protection Act 1999*.

The absence of this form for more than half of all placement decisions comprising the audit sample limited the availability of information that could be used to assess the Department of Communities' compliance with section 83 of the *Child Protection Act 1999*.

Advice from the Department of Communities on 6 December 2010 indicated that the 'Recognised Entity/Child Placement Principle' ICMS form is not currently mandatory when placement decisions are made for Aboriginal and Torres Strait Islander children and young people. The Child Safety Practice Manual requires Child Safety Officers to record and capture all outcomes of the decision making process in the ICMS form. However, there is currently a system limitation in ICMS which does not mandate the completion of the ICMS form.

The Department of Communities further advised that a priority system enhancement has been requested to correct the system limitation. However, the correction was not expected to be completed within 2010-11.

### Recommendation 3

The Department of Communities commit to a timeframe for enhancing ICMS to make completion of the 'Recognised Entity/Child Placement Principle' form mandatory when making a placement decision for an Aboriginal or Torres Strait Islander child or young person, and advise of this timeframe by the end of April 2012.

### **The Department of Communities' response to the recommendation**

*Enhancements to ICMS to make the completion of the 'Recognised Entity/ Child Placement Principle' form mandatory for Aboriginal and Torres Strait Islander children is scheduled to enter production in March 2012.*

*The form will be automatically created, on creation of placement events for Aboriginal and Torres Strait Islander children and allocated to the case manager. A reminder to complete the form will also appear when an Authority to Care is being approved and the placement event will not close until this form is completed.*

### **Recording of cultural status in ICMS records**

Cultural status could not be identified in the specific ICMS records provided for 21 children and young people comprising the audit sample. In these cases, cultural status was confirmed with the Department of Communities through reference to record keeping elsewhere in ICMS or hard copy records. The absence of this information in the forms provided to the Commission may be in part due to point-in-time information capture in ICMS. Meaning, at the time the form was completed in ICMS the child's cultural status may not have been confirmed.

The Commission made a finding that monitoring of compliance with section 83 of the *Child Protection Act 1999* would be assisted if information about cultural status was also recorded in the 'Recognised Entity/Child Placement Principle' ICMS form. This would ensure that all necessary information to inform an assessment of compliance would be contained in a single point of record keeping (once the inaugural recommendations have been implemented in their entirety).

The Commission made a provisional recommendation to the Department of Communities to address this:

*The Department of Communities commit to a timeframe for enhancing the 'Recognised Entity/Child Placement Principle' form in ICMS to contain information about the identification of the child's cultural status, to ensure that all necessary information to inform an assessment of compliance with section 83 of the Child Protection Act 1999 is contained in a single point of record keeping, and advise of this timeframe within three months.*

The Department of Communities provided the following response:

*Relevant demographic information about children used to inform placement decisions is currently recorded within ICMS. The key locations for recording the child and their family's cultural status are the Person Profile and the Cultural Support Plan within the Case Plan. Recording this information in these locations is considered the appropriate record keeping method.*

The Department of Communities further identified that this issue had been factored into recent planned enhancements to ICMS in the following ways:

- The 'Recognised Entity/Child Placement Principle' form will be automatically created when placement events are created for Aboriginal and/or Torres Strait Islander children
- To close a placement event for an Aboriginal and/or Torres Strait Islander child, a 'Recognised Entity /Child Placement Principle' form must be completed, and

- A warning will appear when attempting to close the placement event which contains a 'Recognised Entity/Child Placement Principle' form where the child is not listed as Aboriginal and/or Torres Strait Islander. The Child Safety Officer will accordingly be directed to update the child's cultural status on their Profile tab prior to closing the placement event.

This advice indicates that ICMS functionality will ensure an appropriate record keeping link between establishing the child's cultural status and completing the necessary 'Recognised Entity/Child Placement Principle' form. Accordingly, the Commission is satisfied that the identified issue has been proactively addressed by the Department of Communities and the recommendation is no longer necessary.

### The application of section 83 of the *Child Protection Act 1999* to respite placements

A theme evident in the survey responses provided by Child Safety Officers was that there was uncertainty regarding whether section 83 of the *Child Protection Act 1999* applied to respite placements.

The audit also highlighted that the *Child Protection Act 1999* does not provide prescriptive guidance about the application of section 83 to respite placements. Recent changes to the Child Safety Practice Manual (CSPM) specify that where respite for a child incorporates an out-of-home care placement the Child Safety Officer should seek a placement that is consistent with the Indigenous Child Placement Principle for an Aboriginal or Torres Strait Islander child. However, the CSPM does not mandate this practice.<sup>40</sup>

Advice from the Department of Communities, through its membership in the Advisory Committee, indicated that respite is a planned event over a period of time and so it needs to factor in compliance with section 83 of the *Child Protection Act 1999*.

Accordingly, the application of section 83 of the *Child Protection Act 1999* to respite placements has been identified as an area of service delivery that requires clarification to support practice.

#### Recommendation 4

The Department of Communities review and (by the end of April 2012) clarify its practice guidance regarding the application of section 83 of the *Child Protection Act 1999* to respite placements for Aboriginal and Torres Strait Islander children and young people.

#### The Department of Communities' response to the recommendation

*Accepted.*

*Enhancements to ICMS in relation to placements will also apply to decisions for respite placements.*

*These enhancements include amendments to the 'Recognised Entity/Child Placement*

<sup>40</sup> Chapter 5, Section 2.6 of the Child Safety Practice Manual.

*Principle' form to record;*

- *the question "Has proper consideration been given to the placements ability to ensure optimal retention of the child's relationships with parents, siblings and other people of significance under Aboriginal tradition or Island custom?"*
- *on answering no to the above question, reasons why proper consideration was not given must be entered*

*These are scheduled to enter production in March 2012. Each placement option will identify their relationship priority based on section 83 (4 & 6) of the Child Protection Act 1999.*

### **Information discrepancy between Child Safety Officers and Recognised Entities**

The compliance findings indicated discrepancies between the Department of Communities' information sources (the Child Safety Officer survey responses and ICMS records) and the information provided by Recognised Entities.

Specifically, there were 60 placement decisions where there was a discrepancy between the information provided by the Department of Communities (either in ICMS records or Child Safety Officer survey responses) and the information provided by Recognised Entities in regard to at least one step of the Compliance Assessment Tool. In these cases, compliance was inferred where at least one data source indicated that compliance had occurred, based on advice from the Advisory Committee.

The lack of unanimity between information gathered from the Department of Communities and Recognised Entities indicates need for improvement in participation and information sharing processes.

#### **Recommendation 5**

The Department of Communities collaborate with Recognised Entities, either through their peak representative body, the Queensland Aboriginal and Torres Strait Islander Child Protection Peak, or at a local level, to confirm information sharing needs and processes in regard to placement decisions for Aboriginal and Torres Strait Islander children and young people and to confirm the record keeping requirements and obligations of both. An agreed outcome is to be documented by the end of April 2012.

#### **The Department of Communities' response to the recommendation**

*Accepted.*

### Information discrepancy between ICMS records and Child Safety Officers

The compliance findings indicated discrepancies between the Department of Communities' two information sources – the ICMS records and the Child Safety Officer survey responses.

Specifically, there were 67 cases where there was a discrepancy between the information provided by the Child Safety Officer in their survey response and the information contained in the ICMS record in regard to at least one step of the Compliance Assessment Tool. In these cases, ICMS was determined to be the key record, based on advice from the Advisory Committee.

The lack of consistency in information contained in the Department of Communities' data sources indicates the need for improvement in record keeping practices. However, an additional recommendation will not be made to address record keeping issues as the ICMS related recommendations from the inaugural audit which are currently being implemented will address these record keeping limitations.

### Capacity to comply with section 83 of the *Child Protection Act 1999*

The audit findings identified evidence of compliance across all steps in 15% of cases.

Discussions with Advisory Committee members about this indicated that compliance with section 83 of the *Child Protection Act 1999* may not always be achievable where emergency placements are required for Aboriginal and Torres Strait Islander children and young people.

The Department of Communities' policies and procedures provide clear direction about the need to review placement decisions where the child has not been placed with an Aboriginal and/or Torres Strait Islander carer. However, they do not specify the timeframe that a placement decision must be reviewed within where section 83 of the *Child Protection Act 1999* has been unable to be applied to an emergency placement.

Additionally, current record keeping infrastructure does not capture the cases where a placement decision has been made in urgent circumstances and has been unable to comply with all requirements of section 83 of the *Child Protection Act 1999*, or the timeframe within which the decision is reviewed and compliance subsequently achieved.

#### **Recommendation 6**

The Department of Communities clarify (by the end of April 2012) in the relevant policy and procedural documents that placement decisions must be reviewed within a specified amount of time where emergency placements are made for Aboriginal and Torres Strait Islander children and young people and section 83 of the *Child Protection Act 1999* is unable to be applied.

### **The Department of Communities' response to the recommendation**

*All placement decisions are reviewed during the case planning review process on a six monthly basis, emergency placements are reviewed as part of day to day case work activities when seeking alternative placement options for all children in out of home care.*

The Commission considered the Department of Communities' response and has determined that the recommendation remains relevant as there needs to be specific guidance in the Department of Communities' policies/procedures to direct practice in this area.

### **Recommendation 7**

The Department of Communities establish an appropriate record keeping mechanism, in ICMS or otherwise, to record:

- when and why emergency placements are made for Aboriginal and Torres Strait Islander children and young people and section 83 of the *Child Protection Act 1999* is unable to be applied, and
- the timeframe that the placement decision was reviewed within, and
- the outcome.

Advice is required by the end of April 2012 of the proposed approach and timeframe required to implement.

### **The Department of Communities' response to the recommendation**

*An enhancement to ICMS, making the question "was this placement due to urgent circumstances?" and the "rationale for placement decision" text box mandatory within the 'Recognised Entity/ Child Placement Principle' form, for all placements, is scheduled to enter production in March 2012.*

*The remaining aspects of this recommendation will be considered, as relevant, to the implementation of recommendation seven. The current method for recording review of the child's needs, including placement, is the Review Report, Child Strength and Needs Assessment and the Case Plan.*

# Chapter 5

## Part C - The outcomes achieved as a result of the Department of Communities' efforts to comply with section 83 of the *Child Protection Act 1999*

### Key messages

- Overall, Aboriginal and Torres Strait Islander children and young people reported positive outcomes in relation to contact with family and community and opportunities to participate in cultural activities and events (as intended by section 83 of the *Child Protection Act 1999*).
- Aboriginal and Torres Strait Islander children and young people placed with an Indigenous carer reported more positive outcomes in relation to contact with family and community and opportunities to participate in cultural activities and events, compared to those placed with a non-Indigenous carer.
- State wide analysis revealed that there was mixed findings in terms of contact with family and community. Children within the Commission's Brisbane West Community Visitor Zone reported the most positive outcomes in relation to opportunities to participate in cultural activities and events.

### 5.1 The importance of monitoring outcomes

Key learnings from the inaugural *Indigenous Child Placement Principle Audit Report 2008* highlighted potential to complement monitoring compliance with section 83 of the *Child Protection Act 1999*, by assessing the outcomes experienced by Aboriginal and Torres Strait Islander children and young people placed in out-of-home care in accordance with section 83.

Assessing the outcomes of Aboriginal and Torres Strait Islander children and young people in out-of-home care (relevant to their maintained connection to family, community and culture) also assists in overcoming some of the record keeping limitations identified in auditing the Department of Communities' efforts to comply with section 83 of the *Child Protection Act 1999*.

### 5.2 The framework for monitoring outcomes

The Commission established four key areas of focus to facilitate targeted monitoring of the outcomes experienced by Aboriginal and Torres Strait Islander children and young people placed in out-of-home care.<sup>41</sup> These key areas of focus were informed by a literature review and direct engagement with Aboriginal and Torres Strait Islander children and young people, and are:

- Family contact
- Contact with community/people of significance
- Participation in cultural activities/events, and
- Cultural identity.

<sup>41</sup> Refer to the Audit Methodology for detail about the Commission's process for establishing the key areas of focus.

These areas of focus provide the reporting framework for this component of the audit.

### **5.3 Process for assessing the outcomes**

In July 2010, the Commission assessed the outcomes experienced by 1109 Aboriginal and Torres Strait Islander children and young people in out-of-home care visited by the Commission's Community Visitors (CVs).<sup>42</sup>

The assessment was based on CV reports, which are completed after each visit with a child or young person to verify that they are safe, are receiving appropriate care, to advocate on their behalf to help resolve any concerns or grievances and to offer support if required. These reports are based on an independent assessment made by the CV. Information and evidence used to formulate the CV's assessment is derived from multiple sources, including engagement and one-on-one discussions with the child during the visit, the CV's observations during the visit and/or statements made by the child's carer about the child.

The CVs were asked to ensure they captured all necessary information in their CV reports for July 2010 to inform the Commission's assessment of the outcomes experienced by Aboriginal and Torres Strait Islander children and young people relevant to their connection to family, community and culture.

Based on advice from the Advisory Committee, findings from the CV reports were further analysed to compare the outcomes experienced by Aboriginal and Torres Strait Islander children and young people placed with an Indigenous carer with those placed with a non-Indigenous carer. Outcomes were also assessed across the state by CV Zones (Appendix 8 shows CV Zones).<sup>43</sup>

The findings reported are for the total number of valid responses provided for each question. Accordingly, the category 'all children' refers to all children and young people who had a valid response recorded for a particular question.

Reference is also made in this part of the report to CV engagement with 136 Aboriginal and Torres Strait Islander children and young people in August and September 2009 in relation to cultural identity.<sup>44</sup> This was a smaller sample of Aboriginal and Torres Strait Islander children and young people who participated in a unique series of questions relevant to their culture. This smaller sample was used, along with a literature review and Advisory Committee input, to establish the four key areas of focus.

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<sup>42</sup> Refer to the Audit Methodology for detail about the information captured by the CVs.

<sup>43</sup> CV Zones do not align with the Department of Communities' Regions and cannot be directly compared.

<sup>44</sup> This sample was comprised of Aboriginal and/or Torres Strait Islander children and young people aged 10 to 17 on a Child Protection Order.

## 5.4 Demographics of the 1109 Aboriginal and/or Torres Strait Islander children and young people visited in July 2010

### Placement type

There were 1109 Aboriginal and Torres Strait Islander children and young people visited in July 2010. Of these, 115 (10%) were placed in a 'visitable site'<sup>45</sup> and 994 (90%) were placed in a 'visitable home'.<sup>46</sup>

Of the 994 Aboriginal and Torres Strait Islander children and young people visited by a CV in a visitable home in July 2010:

- 277 (28%) were placed with an Aboriginal and/or Torres Strait Islander carer<sup>47</sup>
- 470 (47%) were placed with a non-Indigenous carer, and
- 247 (25%) were placed with carers whose Indigenous status required clarification.<sup>48</sup>

### Gender

Of the 1109 Aboriginal and Torres Strait Islander children and young people visited by a CV in July 2010, 553 were male and 556 were female.

### Age

Almost two thirds of the children and young people visited by a CV in July 2010 were aged 9 or under, as illustrated in the age breakdown in Table 7.

**Table 7: Age breakdown of Aboriginal and Torres Strait Islander children and young people in out-of-home care visited by a CV in July 2010<sup>49</sup>**

Age group	Number	Percentage
0 to 4	301	27%
5 to 9	401	36%
10 to 14	301	27%
15 to 17	106	10%
Total	1109	100%

<sup>45</sup> A 'visitable site' is a site in which the CVs have legislative authority (in accordance with section 89 of the Commission's Act) to visit children and young people placed in care. This entails a site where a child is residing in a residential facility or detention centre, or at an authorised mental health service under the *Mental Health Act 2000*.

<sup>46</sup> A 'visitable home' is a home in which the CVs have legislative authority (in accordance with section 89 of the Commission's Act) to visit children and young people placed in care. This entails a home in which a child who is in the custody or guardianship of the chief executive (child safety) has been placed in the care of an approved carer or someone else other than the parent of the child, or a home in which a child who is under a care agreement has been placed with someone other than the parent of the child.

<sup>47</sup> This category includes all placements where the child was placed with at least one Aboriginal and/or Torres Strait Islander carer.

<sup>48</sup> Information about the carer's cultural status is sourced from the Department of Communities based on their records at a point in time as part of monthly information sharing with the Commission.

<sup>49</sup> Percentages may not add up to 100% owing to rounding.

## 5.5 Key Area of Focus 1 - Family contact

### 5.5.1 Contact with parents

#### Key findings

- 89% of children and young people were reported as having some level of parental contact, the most common frequency identified as weekly contact (41%).
- 80% of children and young people were reported as satisfied with parental contact. However, satisfaction with parental contact was 11% greater for children and young people placed with an Indigenous carer (85%) in comparison to those placed with a non-Indigenous carer (74%).

#### Frequency of parental contact

Figure 19 illustrates the following findings regarding the frequency of parental contact.

#### All children<sup>50</sup>

Of the 819 valid responses:<sup>51</sup>

- 89% of all children and young people were reported to be having some level of parental contact.<sup>52</sup>
- The most common frequency of parental contact reported was weekly contact (41%).<sup>53</sup>

#### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 208 and 345 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>54</sup>

- 91% of children and young people placed with an Indigenous carer were reported to be having some level of parental contact, similar to 88% of those placed with a non-Indigenous carer.<sup>55</sup>
- The most common frequency of parental contact reported was weekly contact for children and young people placed with either an Indigenous or a non-Indigenous carer (40% for both).<sup>56</sup>

<sup>50</sup> Refers to all 819 children and young people who had a valid response provided for them for the question.

<sup>51</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>52</sup> 731 of 819 valid responses.

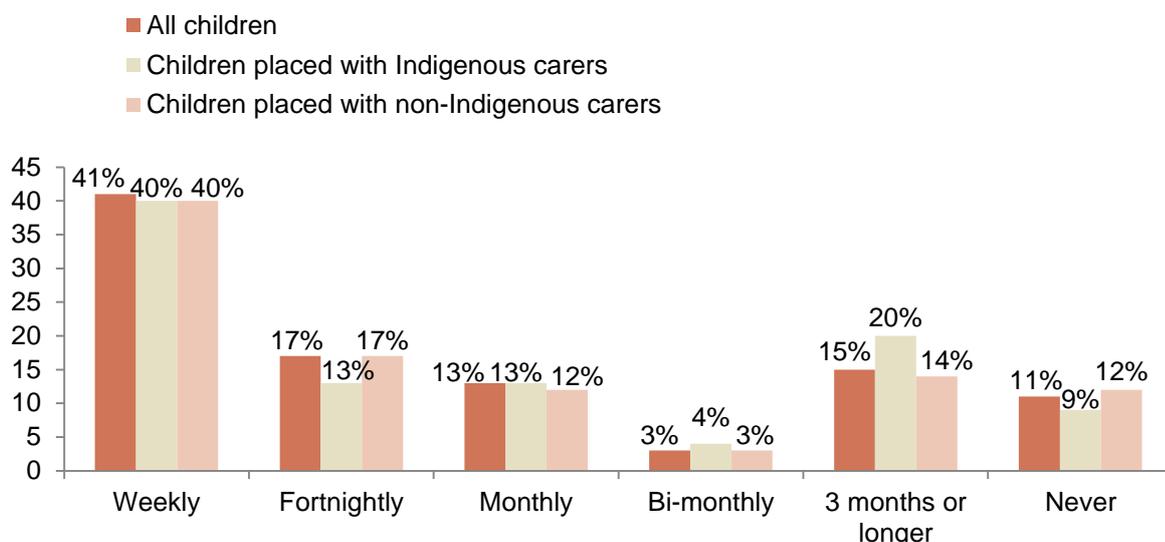
<sup>53</sup> 339 of 819 valid responses.

<sup>54</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>55</sup> 189 of 208 valid responses and 302 of 345 valid responses respectively.

<sup>56</sup> 84 of 208 valid responses and 139 of 345 valid responses respectively.

**Figure 19: Breakdown of frequency of parental contact<sup>57</sup>**



**Commission  
Community  
Visitor Zones**

State wide analysis revealed that:

- Brisbane West Zone was reported to have the highest proportion of weekly parental contact (60%) and Sunshine Coast Zone was reported to have the lowest proportion (14%).<sup>58</sup>
- Sunshine Coast Zone was also reported as having the highest proportion of parental contact not occurring (21%).<sup>59</sup>

**Child’s satisfaction with parental contact**

Figure 20 illustrates the following findings regarding satisfaction with parental contact.

**All children<sup>60</sup>**

Of the 519 valid responses.<sup>61</sup>

- 80% of all children and young people were reported to be satisfied with parental contact.<sup>62</sup>
- 17% of all children and young people were reported to want more contact with their parents.<sup>63</sup>

<sup>57</sup> Percentages may not add up to 100% owing to rounding.

<sup>58</sup> Brisbane North – 43% of 37 valid responses; Brisbane South – 53% of 43 valid responses; Brisbane West – 60% of 72 valid responses; Central North – 32% of 85 valid responses; Central South – 47% of 53 valid responses; Far Northern – 35% of 124 valid responses; Gold Coast – 39% of 36 valid responses; Ipswich – 49% of 63 valid responses; Logan – 34% of 29 valid responses; Moreton and South Burnett – 36% of 47 valid responses; Northern – 57% of 115 valid responses; Sunshine Coast – 14% of 42 valid responses; Toowoomba and Western – 26% of 73 valid responses.

<sup>59</sup> Brisbane North – 5% of 37 valid responses; Brisbane South – 7% of 43 valid responses; Brisbane West – 10% of 72 valid responses; Central North – 9% of 85 valid responses; Central South – 8% of 53 valid responses; Far Northern – 4% of 124 valid responses; Gold Coast – 11% of 36 valid responses; Ipswich – 11% of 63 valid responses; Logan – 17% of 29 valid responses; Moreton and South Burnett – 11% of 47 valid responses; Northern – 20% of 115 valid responses; Sunshine Coast – 21% of 42 valid responses; Toowoomba and Western – 8% of 73 valid responses.

<sup>60</sup> Refers to all 519 children and young people who had a valid response provided for them for the question.

<sup>61</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV’s capacity, the child’s willingness to engage, the relevance of the question to the child, or the child’s ability to communicate due to age or disability.

<sup>62</sup> 417 of 519 valid responses.

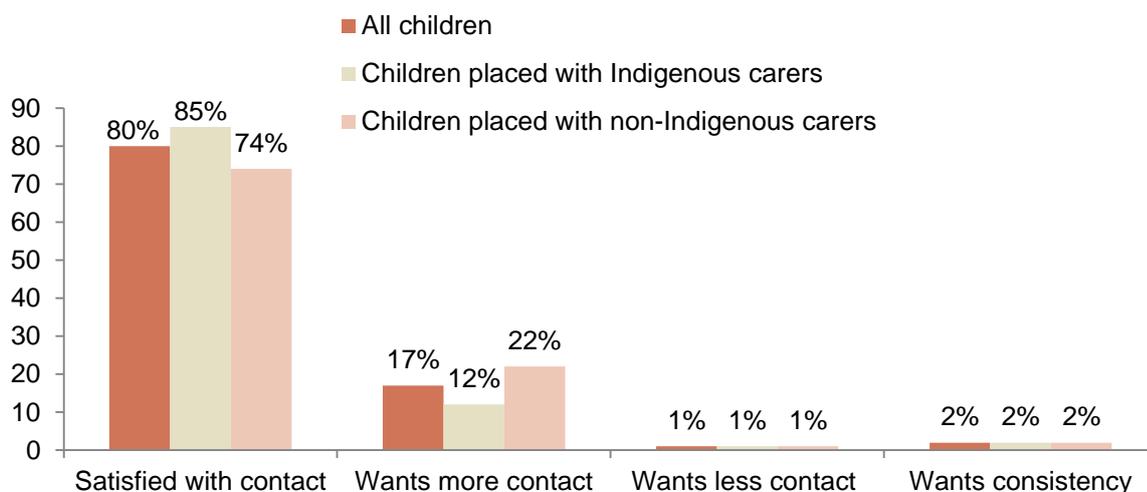
<sup>63</sup> 87 of 519 valid responses.

**Children placed with an Indigenous carer versus a non-Indigenous carer**

Of the 135 and 196 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>64</sup>

- Satisfaction with parental contact was reported to be 11% greater for children and young people placed with an Indigenous carer (85%) compared to those placed with a non-Indigenous carer (74%).<sup>65</sup>

**Figure 20: Breakdown of child’s satisfaction with parental contact<sup>66</sup>**



**Commission Community Visitor Zones**

State wide analysis revealed that:

- Toowoomba and Western Zone was reported to have the highest proportion of child satisfaction with parental contact (95%) and Brisbane South Zone and Sunshine Coast Zone was reported to have the lowest proportion (63% each).<sup>67</sup>
- In a little more than half of the Community Visitor Zones (Brisbane North, Brisbane South, Central North, Far Northern, Ipswich, Logan, Sunshine Coast) at least one fifth of children and young people were reported as wanting more contact with their parents.<sup>68</sup>

<sup>64</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV’s capacity, the child’s willingness to engage, the relevance of the question to the child, or the child’s ability to communicate due to age or disability.

<sup>65</sup> 115 of 135 valid responses and 146 of 196 valid responses respectively.

<sup>66</sup> Percentages may not add up to 100% owing to rounding.

<sup>67</sup> Brisbane North – 71% of 21 valid responses; Brisbane South – 63% of 16 valid responses; Brisbane West – 88% of 43 valid responses; Central North – 76% of 46 valid responses; Central South – 73% of 37 valid responses; Far Northern – 74% of 93 valid responses; Gold Coast – 92% of 25 valid responses; Ipswich – 74% of 43 valid responses; Logan – 75% of 16 valid responses; Moreton and South Burnett – 79% of 29 valid responses; Northern – 93% of 82 valid responses; Sunshine Coast – 63% of 24 valid responses; Toowoomba and Western – 95% of 44 valid responses.

<sup>68</sup> Brisbane North – 29% of 21 valid responses; Brisbane South – 38% of 16 valid responses; Brisbane West – 7% of 43 valid responses; Central North – 22% of 46 valid responses; Central South – 19% of 37 valid responses; Far Northern – 20% of 93 valid responses; Gold Coast – 8% of 25 valid responses; Ipswich – 26% of 43 valid responses; Logan – 25% of 16 valid responses; Moreton and South Burnett – 17% of 29 valid responses; Northern – 7% of 82 valid responses; Sunshine Coast – 25% of 24 valid responses; Toowoomba and Western – 5% of 44 valid responses.

## Barriers to contact with parents

### All children<sup>69</sup>

Of the 402 valid responses provided about contributing factors for non-contact with a parent, key issues reported were:<sup>70</sup>

- The parent was unwilling to maintain contact (116 or 29%)
- Distance/travel issues (67 or 17%)
- The child was unwilling to maintain contact (38 or 9%)
- The parent was incarcerated (29 or 7%)
- The parent's health/personal issues (26 or 6%)
- Contact was considered not to be in the child's best interests (by either the Department of Communities or the carer) (25 or 6%)
- The parent was not locatable or unknown (22 or 5%)
- The parent was deceased (20 or 5%)
- Service delivery issues (by the Department of Communities or another agency) (10 or 2%).<sup>71</sup>

## 5.5.2 Contact with other family members

### Key findings

- 93% of all children and young people were reported to be having some level of contact with other family members.
- The most common frequency of contact with other family members was reported to be weekly contact (56%). However, weekly contact was 21% greater for children and young people placed with an Indigenous carer (67%) in comparison to those placed with a non-Indigenous carer (46%).
- 89% of children and young people were reported to be satisfied with their contact with other family members. However, 11% wanted more contact.

### Frequency of contact with other family members

Figure 21 illustrates the following findings regarding the frequency of contact with other family members.

### All children<sup>72</sup>

Of the 769 valid responses provided:<sup>73</sup>

- 93% of all children and young people were reported to be having some level of contact with other family members.<sup>74</sup>

<sup>69</sup> Refers to all 402 children and young people who had a valid response provided for them for the question.

<sup>70</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>71</sup> Numbers may not add up due to more than 1 comment being provided in some cases and some responses not identifying any barriers. Service delivery issues included cases where the child did not currently have a Child Safety Officer, the Child Safety Officer not attending planned supervised visits, the Child Safety Officer not providing information when it was requested, and the Child Safety Officer not organising contact when it was requested.

<sup>72</sup> Refers to all 769 children and young people who had a valid response provided for them for the question.

<sup>73</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

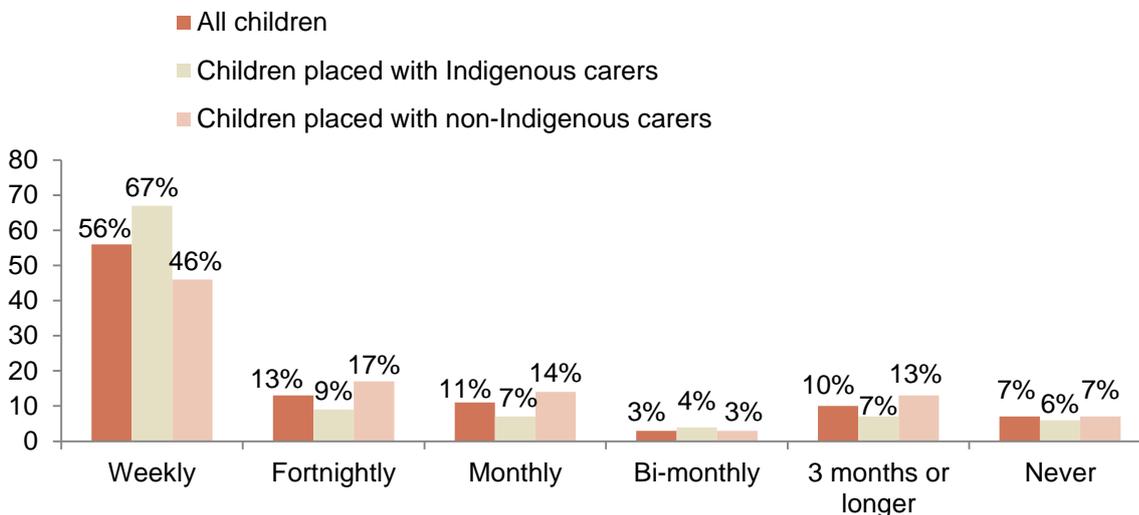
- The most common frequency of contact with other family members reported was weekly contact (56%).<sup>75</sup>

### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 210 and 323 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>76</sup>

- 94% of children and young people placed with an Indigenous carer were reported to be having some level of contact with other family members, similar to 93% of children placed with a non-Indigenous carer.<sup>77</sup>
- Weekly contact was reported to be 21% greater for children and young people placed with an Indigenous carer (67%) in comparison to those placed with a non-Indigenous carer (46%).

**Figure 21: Breakdown of frequency of contact with other family members<sup>78</sup>**



### Commission Community Visitor Zones

State wide analysis revealed that:

- Northern Zone was reported to have the highest proportion of weekly contact between the child and other family members (69%) and Toowoomba and Western Zone was reported to have the lowest proportion (24%).<sup>79</sup>

<sup>74</sup> 714 of 769 valid responses.

<sup>75</sup> 430 of 769 valid responses.

<sup>76</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>77</sup> 197 of 210 valid responses and 301 of 323 valid responses respectively.

<sup>78</sup> Percentages may not add up to 100% owing to rounding.

<sup>79</sup> Brisbane North – 65% of 46 valid responses; Brisbane South – 59% of 46 valid responses; Brisbane West – 52% of 61 valid responses; Central North – 65% of 71 valid responses; Central South – 41% of 51 valid responses; Far Northern – 64% of 117 valid responses; Gold Coast – 38% of 32 valid responses; Ipswich – 57% of 51 valid responses; Logan – 56% of 27 valid responses; Moreton and South Burnett – 58% of 45 valid responses; Northern – 69% of 118 valid responses; Sunshine Coast – 47% of 45 valid responses; Toowoomba and Western – 24% of 59 valid responses.

## Child's satisfaction with contact with other family members

Figure 22 illustrates the following findings regarding satisfaction with contact with other family members.

### All children<sup>80</sup>

Of the 551 valid responses provided:<sup>81</sup>

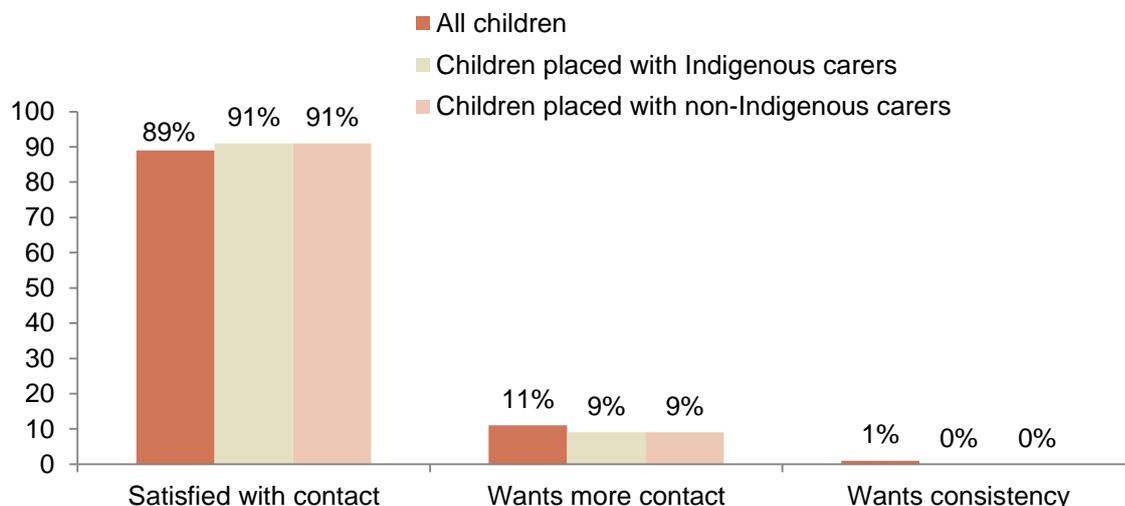
- 89% of all children and young people were reported to be satisfied with their contact with other family members.<sup>82</sup>
- 11% of all children and young people were reported to want more contact with other family members.<sup>83</sup>

### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 153 and 215 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>84</sup>

- Satisfaction with contact with other family members was reported to be equal for children and young people placed with either an Indigenous carer or a non-Indigenous carer (91% for both).<sup>85</sup>

Figure 22: Breakdown of child's satisfaction with contact with other family members<sup>86</sup>



<sup>80</sup> Refers to all 551 children and young people who had a valid response provided for them for the question.

<sup>81</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>82</sup> 489 of 551 valid responses.

<sup>83</sup> 58 of 551 valid responses.

<sup>84</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>85</sup> 139 of 153 valid responses and 195 of 215 valid responses respectively.

<sup>86</sup> Percentages may not add up to 100% owing to rounding.

### Commission Community Visitor Zones

State wide analysis revealed that:

- Northern Zone was reported to have the highest proportion of child satisfaction with contact with other family members (99%) and Far Northern Zone was reported to have the lowest proportion (78%).<sup>87</sup>

### Barriers to contact with other family members

#### All children<sup>88</sup>

Of the 320 valid responses provided about contributing factors for non-contact with other family members, the key issues reported were:<sup>89</sup>

- Distance/travel issues (30 or 9%)
- The child was unwilling to maintain contact (13 or 4%)
- The child's family was unwilling to maintain contact (12 or 4%).<sup>90</sup>

## 5.6 Key Area of Focus 2 - Contact with community/people of significance

### 5.6.1 Contact with traditional language/tribal/totem group

#### Key findings

- 70% of children and young people were reported to be having some level of contact with their traditional language/tribal/totem group. However, contact was 31% greater for children and young people placed with an Indigenous carer (84%) compared to those placed with a non-Indigenous carer (53%).
- The most common frequency for contact with the child's traditional language/tribal/totem group was reported to be weekly contact (40%). However, weekly contact was 41% greater for children and young people placed with an Indigenous carer (63%) compared to those placed with a non-Indigenous carer (22%).
- Almost half (47%) of children and young people placed with a non-Indigenous carer were reported to have no contact with their traditional language/tribal/totem group.
- 91% of children and young people were reported to be satisfied with their contact with their traditional language/tribal/totem group.
- 19% of responses reported about contributing factors for non-contact with the child's traditional language/tribal/totem group indicated limitations in knowledge of the child's traditional language/tribal/totem group.

<sup>87</sup> Brisbane North – 85% of 26 valid responses; Brisbane South – 92% of 24 valid responses; Brisbane West – 93% of 41 valid responses; Central North – 89% of 46 valid responses; Central South – 93% of 40 valid responses; Far Northern – 78% of 105 valid responses; Gold Coast – 83% of 18 valid responses; Ipswich – 87% of 39 valid responses; Logan – 82% of 11 valid responses; Moreton and South Burnett – 92% of 36 valid responses; Northern – 99% of 96 valid responses; Sunshine Coast – 83% of 30 valid responses; Toowoomba and Western – 92% of 39 valid responses.

<sup>88</sup> Refers to all 320 children and young people who had a valid response provided for them for the question.

<sup>89</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>90</sup> Numbers may not add up due to more than 1 comment being provided in some cases and some responses not identifying any barriers.

## Frequency of contact with traditional language/tribal/totem group

Figure 23 illustrates the following findings regarding the frequency of contact with the child's traditional language/tribal/totem group.

### All children<sup>91</sup>

Of the 467 valid responses provided:<sup>92</sup>

- 70% of all children and young people were reported to be having some level of contact with their traditional language/tribal/totem group.<sup>93</sup>
- The most common frequency of contact with the child's traditional language/tribal/totem group was reported to be weekly contact (40%).<sup>94</sup>
- Almost one third (30%) of all children and young people were reported not to be having any contact with their traditional language/tribal/totem group.<sup>95</sup>

### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 150 and 175 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>96</sup>

- 84% of children and young people placed with an Indigenous carer were reported to be having some level of contact with their traditional language/tribal/totem group, contrasted to 53% of those placed with a non-Indigenous carer.<sup>97</sup>
- Weekly contact with the child's traditional language/tribal/totem group was reported to be almost three times greater for children and young people placed with an Indigenous carer (63%) compared to those placed with a non-Indigenous carer (22%).<sup>98</sup>
- Almost half of children and young people placed with a non-Indigenous carer (47%) were reported to be having no contact with their traditional language/tribal/totem group, almost three times greater than those placed with an Indigenous carer (16%).<sup>99</sup>

<sup>91</sup> Refers to all 467 children and young people who had a valid response provided for them for the question.

<sup>92</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>93</sup> 327 of 467 valid responses.

<sup>94</sup> 188 of 467 valid responses.

<sup>95</sup> 140 of 467 valid responses.

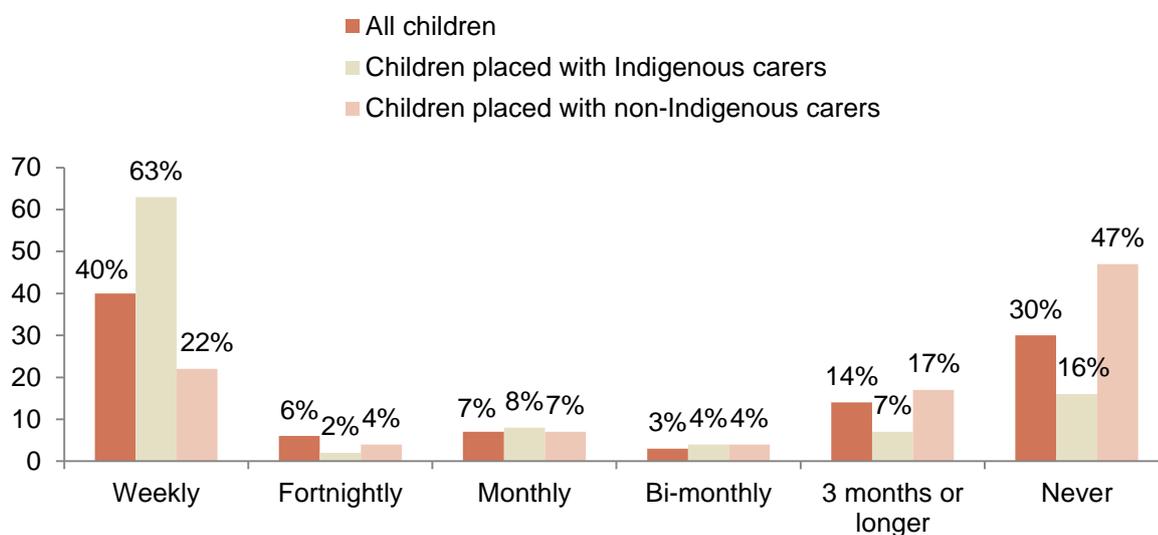
<sup>96</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>97</sup> 126 of 150 valid responses and 93 of 175 valid responses respectively.

<sup>98</sup> 94 of 150 valid responses and 38 of 175 valid responses respectively.

<sup>99</sup> 82 of 175 valid responses and 24 of 150 valid responses respectively.

**Figure 23: Breakdown of frequency of contact with the child's traditional language/tribal/totem group<sup>100</sup>**



### Commission Community Visitor Zones

State wide analysis revealed that:

- Ipswich Zone (69%) was reported to have the highest proportion of weekly contact between the child and their traditional language/tribal/totem group and Moreton and South Burnett Zone was reported to have the lowest proportion (9%).<sup>101</sup>
- Gold Coast Zone (67%) was reported to have the highest proportion of contact not occurring with the child's traditional language/tribal/totem group, with Far Northern Zone reported to have the lowest proportion of contact not occurring (5%).<sup>102</sup>

### Child's satisfaction with contact with traditional language/tribal/totem group

Figure 24 illustrates the following findings regarding satisfaction with contact with the child's traditional language/tribal/totem group.

#### All children<sup>103</sup>

Of the 313 valid responses provided:<sup>104</sup>

- 91% of all children and young people were reported to be satisfied with contact with their traditional language/tribal/totem group.<sup>105</sup>

<sup>100</sup> Percentages may not add up to 100% owing to rounding.

<sup>101</sup> Brisbane North – 31% of 32 valid responses; Brisbane South – 59% of 27 valid responses; Brisbane West – 56% of 27 valid responses; Central North – 35% of 43 valid responses; Central South – 29% of 34 valid responses; Far Northern – 44% of 85 valid responses; Gold Coast – 10% of 21 valid responses; Ipswich – 69% of 16 valid responses; Logan – 29% of 7 valid responses; Moreton and South Burnett – 9% of 23 valid responses; Northern – 59% of 90 valid responses; Sunshine Coast – 15% of 33 valid responses; Toowoomba and Western – 34% of 29 valid responses.

<sup>102</sup> Brisbane North – 34% of 32 valid responses; Brisbane South – 15% of 27 valid responses; Brisbane West – 30% of 27 valid responses; Central North – 30% of 43 valid responses; Central South – 35% of 34 valid responses; Far Northern – 5% of 85 valid responses; Gold Coast – 67% of 21 valid responses; Ipswich – 19% of 16 valid responses; Logan – 29% of 7 valid responses; Moreton and South Burnett – 61% of 23 valid responses; Northern – 31% of 90 valid responses; Sunshine Coast – 55% of 33 valid responses; Toowoomba and Western – 31% of 29 valid responses.

<sup>103</sup> Refers to all 313 children and young people who had a valid response provided for them for the question.

<sup>104</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

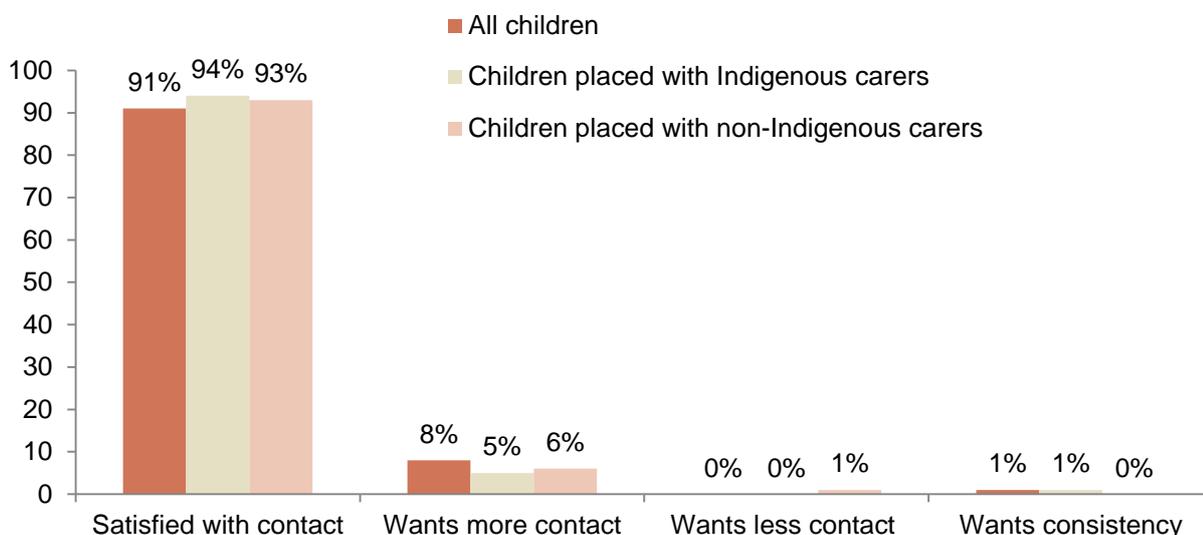
<sup>105</sup> 286 of 313 valid responses.

**Children placed with an Indigenous carer versus a non-Indigenous carer**

Of the 104 and 98 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>106</sup>

- Satisfaction with contact with the child’s traditional language/tribal/totem group was reported to be almost equal for children and young people placed with an Indigenous carer compared to those placed with a non-Indigenous carer (94% and 93% respectively).<sup>107</sup>

**Figure 24: Breakdown of child’s satisfaction with contact with their traditional language/tribal/totem group<sup>108</sup>**



**Commission Community Visitor Zones**

State wide analysis revealed that:

- High rates of child satisfaction with contact with their traditional language/tribal/totem group was reported across the state with 100% satisfaction reported in Brisbane West, Central South, Ipswich, and Toowoomba and Western Zone.<sup>109</sup>

<sup>106</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV’s capacity, the child’s willingness to engage, the relevance of the question to the child, or the child’s ability to communicate due to age or disability.

<sup>107</sup> 98 of 104 valid responses and 91 of 98 valid responses respectively.

<sup>108</sup> Percentages may not add up to 100% owing to rounding.

<sup>109</sup> Brisbane North – 78% of 18 valid responses; Brisbane South – 86% of 14 valid responses; Brisbane West – 100% of 21 valid responses; Central North – 90% of 29 valid responses; Central South – 100% of 21 valid responses; Far Northern – 85% of 78 valid responses; Gold Coast – 83% of 12 valid responses; Ipswich – 100% of 12 valid responses; Logan – 86% of 7 valid responses; Moreton and South Burnett – 92% of 12 valid responses; Northern – 98% of 61 valid responses; Sunshine Coast – 93% of 14 valid responses; Toowoomba and Western – 100% of 14 valid responses.

## Barriers to contact with the child's traditional language/tribal/totem group

### All children<sup>110</sup>

Of the 255 valid responses provided about contributing factors for non-contact with the child's traditional language/tribal/totem group, the key issues reported were:

- Limitations in knowledge of the child's traditional language/tribal/totem group (49 or 19%)
- The child was unwilling to maintain contact (22 or 9%)
- Distance/travel issues (22 or 9%)
- Cultural identity issues (12 or 5%).<sup>111</sup>

## 5.7 Key Area of Focus 3 - Participation in cultural activities/events

### Key findings

- 96% of children and young people were reported to be offered at least one type of cultural activity/resource.
- Children and young people placed with an Indigenous carer were reported to be more likely to be offered each type of activity/resource to assist in maintaining their connection to culture.
- State wide analysis revealed that Brisbane West Community Visitor Zone demonstrated the highest proportion of almost each type of activity/resource offered to children and young people.
- Of the children and young people who were asked whether they were satisfied with the support they received from their carer to participate in cultural activities and maintain links with their culture, 97% indicated they were satisfied.
- Of the children and young people who were asked whether they were satisfied with the support they received from their Child Safety Officer to participate in cultural activities and maintain links with their culture, 87% indicated they were satisfied.
- Of the carers who were asked whether they were satisfied with the support they received from the Child Safety Officer to meet the child's needs for cultural experiences and community contact, 77% indicated they were adequately supported, with carers in Brisbane West Community Visitor Zone indicating 100% satisfaction with support.

### Activities/resources offered to the child

Four per cent of children and young people were reported not to be offered any activities/resources to assist in maintaining their connection to culture.<sup>112</sup>

<sup>110</sup> Refers to all 255 children and young people who had a valid response provided for them for the question.

<sup>111</sup> Numbers may not add up due to more than 1 comment being provided in some cases and some responses not identifying any barriers. Service delivery issues included cases where the child did not currently have a Child Safety Officer, the Child Safety Officer not attending planned supervised visits, the Child Safety Officer not providing information when it was requested, and the Child Safety Officer not organising contact when it was requested.

<sup>112</sup> 40 of the 1109 valid responses.

Figure 25 illustrates the following findings about activities/resources offered to the child.

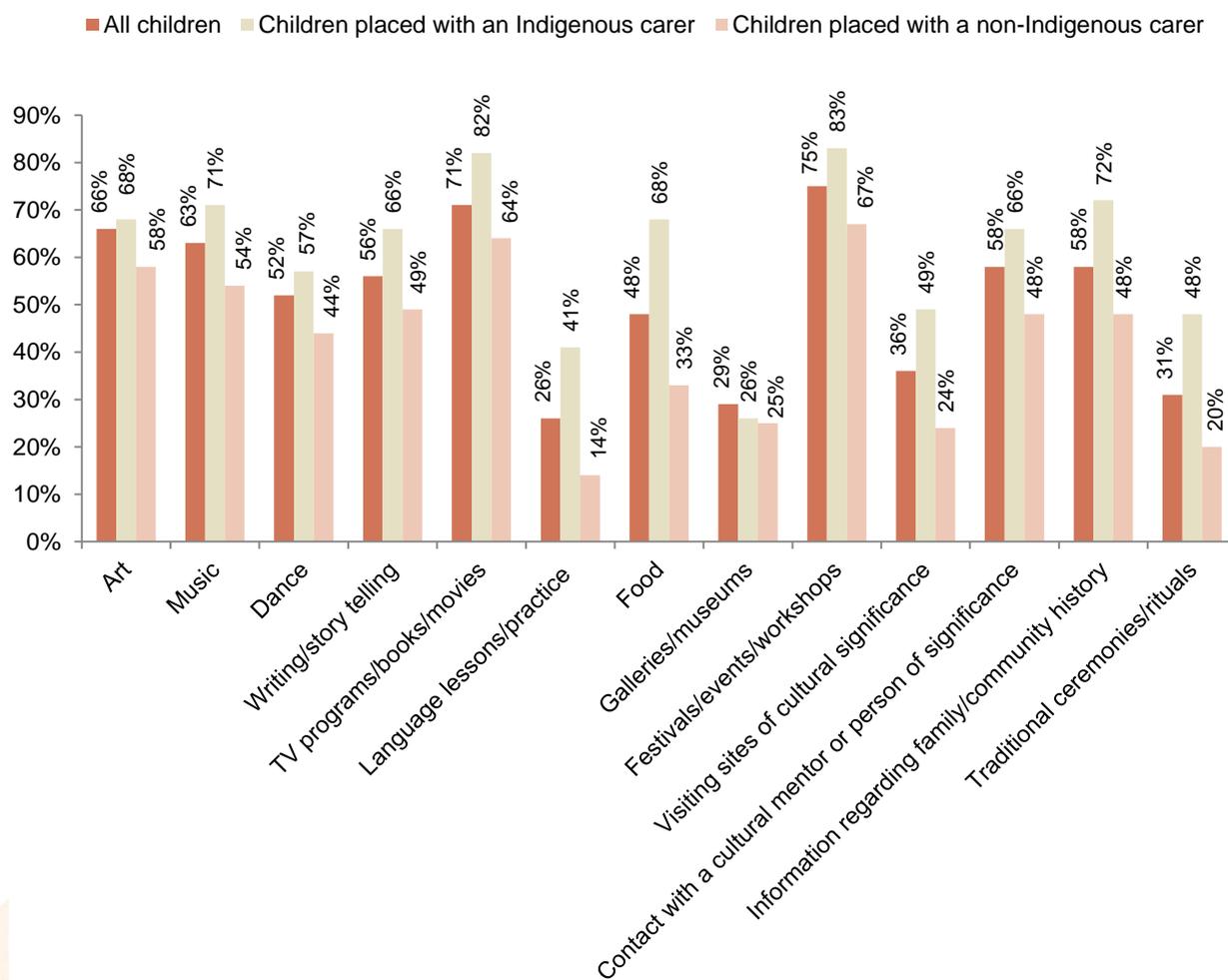
**All children**

- The most common resources/activities offered were reported to be opportunities to attend festivals/events/workshops or receive/utilise television programs/books/movies.

**Children placed with an Indigenous carer versus a non-Indigenous carer**

- Children and young people placed with an Indigenous carer were reported to be more likely to be offered each type of activity/resource compared to children placed with a non-Indigenous carer.

**Figure 25: Percentage breakdown of cultural activities/resources the child has been offered**



### Commission Community Visitor Zones

State wide analysis revealed that:

- Brisbane West Zone was reported to have the highest proportion of the following activities/resources offered: Art (87%), music (90%), dance (84%), writing/story telling (88%), language lessons/practice (59%), galleries/museums (81%), visiting sites of cultural significance (78%), contact with a cultural mentor (84%), traditional ceremonies/rituals (69%).
- Gold Coast Zone was reported to have the lowest proportion of the following activities/resources offered: Art (26%), music (10%), dance (5%), culturally appropriate food (0%), galleries/museums (5%), festivals/events/workshops (46%), visiting sites of cultural significance (9%), information regarding family/community history (23%), traditional ceremonies/rituals (0%).

### Child wanting to participate in an activity/resource not offered to them

#### All children

- There were 4% of children and young people that were reported as wanting to participate in a cultural activity/resource that was not offered to them.<sup>113</sup>
- The most common interest for children was reported to be having information about their family/community history (8 or 30%).<sup>114</sup>

### Child's satisfaction with the support they receive to participate in activities and maintain links with their culture

#### Satisfied with support from carer:

#### All children<sup>115</sup>

Of the 450 valid responses provided:<sup>116</sup>

- 97% of all children and young people were reported to be satisfied with the support they received from their carer to participate in activities and maintain links with their culture.<sup>117</sup>

### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 130 and 157 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>118</sup>

- Satisfaction with the support received from the carer to participate in activities and maintain links with their culture was reported to be similar for children and young people placed with an Indigenous carer (98%) compared to those placed with a non-Indigenous carer (96%).<sup>119</sup>

<sup>113</sup> 27 of 680 valid responses.

<sup>114</sup> Where issues of this nature have been identified, CVs advocated to the Department of Communities to address the situation.

<sup>115</sup> Refers to all 450 children and young people who had a valid response provided for them for the question.

<sup>116</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>117</sup> 437 of 450 valid responses.

<sup>118</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>119</sup> 128 of 130 valid responses and 151 of 157 valid responses respectively.

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### Commission Community Visitor Zones

State wide analysis revealed that:

- Almost half of the Community Visitor Zones were reported to have 100% child satisfaction with the support they received from their carer to participate in activities and maintain links with their culture (Brisbane North, Central South, Logan, Moreton and South Burnett, Northern, Toowoomba and Western).<sup>120</sup>

### Satisfied with support from Child Safety Officer:

#### All children<sup>121</sup>

Of the 349 valid responses provided:<sup>122</sup>

- 87% of all children and young people were reported to be satisfied with the support they received from their Child Safety Officer to participate in activities and maintain links with their culture.<sup>123</sup>

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### Children placed with an Indigenous carer versus a non-Indigenous carer

Of the 94 and 117 valid responses for children and young people placed with an Indigenous or non-Indigenous carer respectively:<sup>124</sup>

- Satisfaction with the support received from the Child Safety Officer to participate in activities and maintain links with their culture was reported to be similar for children and young people placed with a non-Indigenous carer (91%) compared to those placed with an Indigenous carer (88%).<sup>125</sup>

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### Commission Community Visitor Zones

State wide analysis revealed that:

- Northern Zone and Brisbane West Zone (98% each) were reported to have the highest proportion of child satisfaction with the support they received from their Child Safety Officer to participate in activities and maintain links with their culture. Brisbane South Zone demonstrated the lowest proportion (69%).<sup>126</sup>

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<sup>120</sup> Brisbane North – 100% of 21 valid responses; Brisbane South – 95% of 21 valid responses; Brisbane West – 98% of 45 valid responses; Central North – 95% of 44 valid responses; Central South – 100% of 31 valid responses; Far Northern – 93% of 84 valid responses; Gold Coast – 94% of 18 valid responses; Ipswich – 97% of 32 valid responses; Logan – 100% of 10 valid responses; Moreton and South Burnett – 100% of 24 valid responses; Northern – 100% of 64 valid responses; Sunshine Coast – 95% of 21 valid responses; Toowoomba and Western – 100% of 35 valid responses.

<sup>121</sup> Refers to all 349 children and young people who had a valid response provided for them for the question.

<sup>122</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>123</sup> 303 of 349 valid responses.

<sup>124</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>125</sup> 106 of 117 valid responses and 83 of 94 valid responses respectively.

<sup>126</sup> Brisbane North – 90% of 20 valid responses; Brisbane South – 69% of 13 valid responses; Brisbane West – 98% of 44 valid responses; Central North – 87% of 30 valid responses; Central South – 71% of 21 valid responses; Far Northern – 70% of 63 valid responses; Gold Coast – 95% of 19 valid responses; Ipswich – 95% of 21 valid responses; Logan – 75% of 4 valid responses; Moreton and South Burnett – 88% of 16 valid responses; Northern – 98% of 56 valid responses; Sunshine Coast – 79% of 14 valid responses; Toowoomba and Western – 96% of 28 valid responses.

## Carer's satisfaction with the support they receive to meet the child's needs to participate in activities and maintain links with their culture

### All carers<sup>127</sup>

Of the 692 valid responses provided:<sup>128</sup>

- 77% of all carers were reported to be feeling adequately supported by the Child Safety Officer to meet the child or young person's needs for cultural experiences and community contact.<sup>129</sup>

### Indigenous carers versus non-Indigenous carers

Of the 172 and 280 valid responses for Indigenous or non-Indigenous carers respectively:<sup>130</sup>

- Satisfaction with the support received from the Child Safety Officer to meet the child or young person's needs for cultural experiences and community contact was reported to be similar for Indigenous carers (80%) compared to non-Indigenous carers (75%).<sup>131</sup>

### Commission Community Visitor Zones

State wide analysis revealed that:

- Brisbane West Zone (100%) was reported to have the highest proportion of carers feeling adequately supported by the Child Safety Officer to meet the child or young person's needs for cultural experiences and community contact and Brisbane South Zone demonstrated the lowest proportion (46%).<sup>132</sup>

## Barriers to participation in cultural activities

### All children

Of the 136 valid responses provided about factors impacting on participation in cultural activities, the key issues reported were:<sup>133</sup>

- The child's age (16 or 12%), and
- The child was unwilling to participate (13 or 10%).<sup>134</sup>

<sup>127</sup> Refers to all 692 children and young people who had a valid response provided for them for the question.

<sup>128</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>129</sup> 535 of 692 valid responses.

<sup>130</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>131</sup> 138 of 172 valid responses and 211 of 280 valid responses respectively.

<sup>132</sup> Brisbane North – 93% of 46 valid responses; Brisbane South – 46% of 26 valid responses; Brisbane West – 100% of 70 valid responses; Central North – 82% of 62 valid responses; Central South – 63% of 43 valid responses; Far Northern – 56% of 128 valid responses; Gold Coast – 92% of 26 valid responses; Ipswich – 85% of 59 valid responses; Logan – 75% of 12 valid responses; Moreton and South Burnett – 78% of 41 valid responses; Northern – 89% of 93 valid responses; Sunshine Coast – 66% of 38 valid responses; Toowoomba and Western – 77% of 48 valid responses.

<sup>133</sup> The total number of valid responses excludes those cases where the CV was unable to collect information for the child relevant to the question due to the CV's capacity, the child's willingness to engage, the relevance of the question to the child, or the child's ability to communicate due to age or disability.

<sup>134</sup> Numbers may not add up due to more than one comment being provided in some cases and some responses not identifying any barriers.

## 5.8 Key Area of Focus 4 - Cultural identity

### Key findings

- Of the 136 children and young people who were asked about their Mob, 48% indicated some sense of knowing who their Mob is.
- Of the children and young people who indicated they knew who their Mob is, 68% expressed feeling connected to their Mob.
- Of the children and young people who indicated they did not know who their Mob is, 54% expressed that it was important to them to know who their Mob is.

Questions specific to cultural identity were not captured in July 2010 as occurred for the other sections of this chapter. However, relevant information was captured in August and September 2009. Specifically, CVs engaged with 136 Aboriginal and Torres Strait Islander children and young people in detail about their connection to their Mob.<sup>135</sup> Findings are discussed below.

#### Identification of Mob

- When asked 'Who is your Mob?', almost half (65 of 136, or 48%) of the children and young people reported that they had some sense of who their Mob is. Responses were varied with children identifying their Mob through reference to their Mob, country, totem, family, foster family and the broad locality of where their Mob was from (i.e. Cairns).
- Two (1%) children reported that they were not sure who their Mob is.
- Half (69) of the children and young people reported that they did not have a sense of who their Mob is.

#### Connection to Mob

Of the 62 (46% of 136) children and young people who specifically reported knowing who their Mob is:

- 42 (68%) reported that they felt connected.
- 13 (21%) reported that they did not feel connected.
- One (2%) reported that their link to their Mob is important but feels that casual meetings with their distant family is fine.
- One (2%) reported that they can be connected if they choose to be.
- Two (3%) reported not knowing if they were connected to their Mob.
- Three (5%) did not respond.

#### Importance of knowing Mob

Of the 69 (51% of 136) children and young people who reported not knowing who their Mob is:

- 37 (54%) reported that it was important to know who their Mob is.
- 22 (32%) reported that it was not important to know who their Mob is.
- Three (4%) reported not knowing if it was important to them to know who their Mob is.

<sup>135</sup> The sample represented a response rate of approximately 18% of the 747 Aboriginal and Torres Strait Islander children and young people in out-of-home care for the month, aged 10 to 17 and on a Child Protection Order, and being visited by the Commission's CVs as at 1 September 2009.

- Seven (10%) did not provide a response that indicated whether it was important to them.

## 5.9 Key findings

### All children

- Overall, Aboriginal and Torres Strait Islander children demonstrated positive outcomes in relation to contact with family and community and opportunity to participate in cultural activities and events. These results are very encouraging, however, there is still scope for improvement to ensure Aboriginal and Torres Strait Islander children and young people experience optimal maintained connection with their family, community and culture.
- 19% of responses provided about contributing factors for non-contact with the child's traditional language/tribal/totem group indicated limitations in knowledge of the child's traditional language/tribal/totem group and 51% of children and young people who were asked about their Mob did not know who their Mob is. This indicates a need for strengthened information gathering, and information provision to Aboriginal and Torres Strait Islander children and young people, about their Mob.

#### Recommendation 8

The Department of Communities explore ways to strengthen information gathering, and provision to Aboriginal and Torres Strait Islander children and young people, about their Mob, and advise of the proposed strategies by the end of April 2012.

#### The Department of Communities' response to the recommendation

*Accepted.*

### Children placed with Indigenous carers versus non-Indigenous carers

- Aboriginal and Torres Strait Islander children placed with an Indigenous carer demonstrated the same or better outcomes across every measure of family and community contact and opportunity to participate in cultural activities and events, compared to those placed with a non-Indigenous carer.

#### Recommendation 9

The Department of Communities continue its Indigenous carer recruitment efforts and by the end of April 2012 include key findings from this report in its training and support of all carers in helping drive cultural outcomes for Aboriginal and Torres Strait Islander children and young people in out-of-home care.

### **The Department of Communities' response to the recommendation**

*Accepted.*

### **Across the state**

- State wide analysis revealed that there was mixed findings in terms of contact with family and community. However, Aboriginal and Torres Strait Islander children and young people placed in the Brisbane West Community Visitor Zone reported the most positive outcomes in relation to their opportunities to participate in cultural activities and events.

### **Recommendation 10**

The Department of Communities use the information in this report to help identify where strengths and weaknesses in regional service delivery exist in regards to Aboriginal and Torres Strait Islander children and young people's family and community contact and opportunity to participate in cultural activities/events, and advise by the end of April 2012 of proposed strategies.

### **The Department of Communities' response to the recommendation**

*Accepted.*

# Appendix 1

## Audit methodology

Key learnings from the inaugural *Indigenous Child Placement Principle Audit Report 2008* highlighted the importance of an audit methodology involving multiple sample sources of information to provide the clearest possible picture of compliance. Accordingly, a unique methodology was established for each component of the audit factoring in these key learnings. Expert input was also sought from an Advisory Committee established under the Commission's Act. The Advisory Committee's input helped the Commission establish a robust and credible methodology for undertaking the audit.

### **1.1 Methodology for Part A - The Department of Communities' mechanisms supporting compliance with section 83 of the Child Protection Act 1999**

#### **1.1.1 Established methodology**

A significant emphasis for the inaugural (2008) audit was placed upon evaluating the mechanisms supporting compliance with section 83. This resulted in 28 formal recommendations under the Commission's Act. As such, the methodology established by the Commission for auditing the mechanisms supporting compliance with section 83 of the *Child Protection Act 1999* focussed on evaluating the Department of Communities' implementation of the 28 inaugural recommendations. This approach entailed:

- The Department of Communities providing a final implementation report to the Commission for evaluation, along with evidence of implementation
- The Commission seeking the Advisory Committee's input on the extent and adequacy of implementation of each of the 28 inaugural recommendations, drawing upon their expertise in child protection and/or Aboriginal and Torres Strait Islander health and wellbeing, and
- The Commission taking into consideration the Department of Communities' report and the Advisory Committee's input to make a final assessment of the implementation status of each of the 28 inaugural recommendations.

#### **1.1.2 Information gathered to inform evaluation of implementation**

The Department of Communities provided its final report to the Commission on the implementation of the 28 inaugural recommendations on 23 December 2010.

The report provided a summary of the action taken by the Department of Communities against each recommendation and included documentary evidence of implementation where relevant. This information has been summarised in Appendix 2.

The Department of Communities provided further advice of action completed or underway relevant to the inaugural recommendations when the Commission provided it with a provisional copy of the report for natural justice purposes. This additional advice, and accompanying evidence, was also taken into consideration by the Commission and is summarised as relevant in Appendix 2.

Part A of this report discusses the findings relevant to the Commission's evaluation of the Department of Communities' implementation of the 28 inaugural recommendations using the methodology and information sources outlined.

## **1.2 Methodology for Part B – The Department of Communities' practice compliance with section 83 of the Child Protection Act 1999**

### **1.2.1 Established methodology**

The methodology established by the Commission for monitoring the practice compliance with section 83 of the *Child Protection Act 1999* entailed:

- Analysis of the Department of Communities' electronic records for a random sample of 388<sup>136</sup> placement decisions made for Aboriginal and Torres Strait Islander children and young people in the custody or guardianship of the Chief Executive in 2008/09, and
- Surveying Recognised Entities and Child Safety Officers who were involved in the 388<sup>137</sup> placement decisions comprising the audit sample.

The methodology involved using each information source to evaluate the decision making process for each placement decision to determine compliance across all steps of the Compliance Assessment Tool (Appendix 5). This tool summarises the key requirements of section 83 of the *Child Protection Act 1999* and was endorsed by the Advisory Committee as the framework for assessing compliance.

### **1.2.2 Process for establishing the methodology**

#### **Agreement on the use of the Compliance Assessment Tool as the framework for assessing compliance**

The Compliance Assessment Tool was developed, tested and published as part of the inaugural *Indigenous Child Placement Principle Audit Report 2008* as a way to assess compliance with section 83 of the *Child Protection Act 1999*.

Compliance with section 83 of the *Child Protection Act 1999* occurs when there is compliance with each discrete step of the Compliance Assessment Tool. The Compliance Assessment Tool identifies the following five-step decision making process as integral to achieving compliance with section 83 of the *Child Protection Act 1999*:

<sup>136</sup> The final audit sample was reduced to 388 placement decisions from the agreed 400 placement decisions owing to the exclusion of 12 outliers (4 were outside the audit reference period (2008/09), 7 required further confirmation of the child's cultural status and one was identified as a repeat).

<sup>137</sup> Ibid.

- Step 1 – Identification of the child’s Indigenous status (in accordance with section 83(1) of the *Child Protection Act 1999*)
- Step 2 – Giving a Recognised Entity the opportunity to participate in the placement decision making process (in accordance with section 83(2) and 83(3) of the *Child Protection Act 1999*)
- Step 3 – Identification of placement options (in accordance with the hierarchy set out in section 83(4) and 83(6) of the *Child Protection Act 1999*)
- Step 4 – Proper consideration of placement options and the views of the Recognised Entity (in accordance with section 83(5) of the *Child Protection Act 1999*)
- Step 5 – Assessing non-Indigenous carers’ commitment to supporting the placement (in accordance with section 83(7) of the *Child Protection Act 1999*).<sup>138</sup>

For the purpose of this audit, Step 4 of the Compliance Assessment Tool has been further broken down to identify the extent of compliance with the two aspects of this step:

- Step 4A – Proper consideration of the Recognised Entity’s views, and
- Step 4B – Proper consideration of the placement option’s ability to ensure optimal retention of relationships with key people.

The Compliance Assessment Tool was endorsed by the Advisory Committee for use in the Indigenous Child Placement Principle Audit 2010/11 as an appropriate tool for assessing compliance with section 83 of the *Child Protection Act 1999*.

### Agreement on information available to inform the audit

#### *Availability of information from the Department of Communities*

The Department of Communities (through its membership in the Advisory Committee) advised that ICMS had some capacity to report on the outcomes of decision making in accordance with section 83 of the *Child Protection Act 1999*. However, ICMS remains an end-point recording tool rather than a framework that guides and captures the complete decision making process. Advice indicated that not all essential fields necessary to assess complete compliance with section 83 of the *Child Protection Act 1999* were mandatory in the system and therefore the information captured in ICMS would be unlikely to address all elements of the five step Compliance Assessment Tool.

The Department of Communities further advised that it would be possible to extract information from the Placement Agreement and Case Plan records (which occur after placement decision making) that would assist in filling some of the gaps in the information available to assess compliance with section 83 of the *Child Protection Act 1999*. However, it was acknowledged that this would not allow assessment of complete compliance with section 83 relevant to the actual placement decision making processes of Child Safety Officers.

The Commission sought advice from the Department of Communities about the efficacy of adopting the approach of the inaugural audit and once again assessing compliance through conducting hard copy case file reviews. The Department of Communities advised that there would be no way of assuring hard copy record keeping practices would meet the needs of this process. Accordingly, this approach would have been a manually intensive task for both the Commission and the Department of Communities but could not be assured to provide a valid representation of compliance and would potentially highlight the same record keeping issues that were identified in the inaugural audit.

<sup>138</sup> Step 5 only applies to placement decisions involving non-Indigenous carers.

Taking into consideration the advice provided by the Department of Communities, it was evident that a complete assessment of compliance with section 83 of the *Child Protection Act 1999*, across all steps of the Compliance Assessment Tool, was unlikely to be achievable within the limits of information available from the Department of Communities (either in ICMS or hard copy case files or both).

#### *Availability of information from external agencies*

The Advisory Committee was asked to provide advice on the efficacy of the Commission assessing compliance with section 83 of the *Child Protection Act 1999* by requesting and assessing information available in ICMS (within current limitations of information availability) in conjunction with information that could be canvassed from the Commission's Community Visitor (CV) function and other Advisory Committee members, depending on availability.

Non-departmental Advisory Committee members endorsed this approach and advised of their agencies' capacity to contribute data and information. Specifically, the Queensland Aboriginal and Torres Strait Islander Child Protection Peak advised there was capacity for Recognised Entities to contribute information about the placement decisions comprising the audit to complement departmental data.

Departmental members of the Advisory Committee also suggested a multi-faceted approach to assessing the Department of Communities' compliance with section 83 of the *Child Protection Act 1999* to potentially fill current gaps in information availability. It was suggested that the Commission supplement ICMS data with comprehensive sources, including hard copy case files and qualitative interviews with Child Safety Officers, Recognised Entities, families and children.

The Commission considered the advice provided by the Advisory Committee in establishing the audit methodology for monitoring compliance with section 83 of the *Child Protection Act 1999*, to provide the most robust evidence base possible within the context of information limitations. A decision was made to analyse the Department of Communities' electronic records for a random sample and conduct surveys of the Child Safety Officers and Recognised Entities involved in the placement decisions comprising the sample.

#### *Agreement on sample size*

A random audit sample size of 400 placement decisions made in 2008/09 was agreed with the Department of Communities to be representative, based on its preliminary estimation (at the time the audit methodology was established) that between 1000 and 2000 placement decisions were made for Aboriginal and Torres Strait Islander children and young people in the custody or guardianship of the Chief Executive in 2008/09.

Specific advice was that a sample size of between 290 and 340 placement decisions would "provide for the department and the public a high degree of confidence that these cases would represent the broader population of placement decisions."<sup>139</sup>

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<sup>139</sup> Advice provided by Mr Brad Swan, Deputy Director-General, Child Safety, Youth and Families, Community Participation, Department of Communities on 18 December 2009.

Following a preliminary review of the audit sample, 12 placement decisions were excluded as outliers, reducing the final audit sample to 388 placement decisions.<sup>140</sup>

The Department of Communities later advised (once final figures were generated from ICMS) that the actual number of placement decisions made for Aboriginal and Torres Strait Islander children and young people in the custody or guardianship of the Chief Executive in 2008/09 was 4341 placement decisions, an increase on the original estimate of between 2000 and 3000 placement decisions.<sup>141</sup>

The Department of Communities commented that despite the larger than expected number of placement decisions, the current audit sample remained “a valid and representative sample of all placement decisions made in 2008-09. Using a five per cent confidence interval, a sample size of 364 is adequate for a population of 4000. At a seven per cent confidence interval, a sample size as low as 194 is considered sufficient.”<sup>142</sup>

The final sample size of 388 placement decisions represents 9% of all (4341) placement decisions made for Aboriginal and Torres Strait Islander children and young people in the custody or guardianship of the Chief Executive in 2008/09.

### 1.2.3 Information requested to inform the assessment of compliance

#### Information requested

The Commission issued the Department of Communities with a request for information under the former Chapter 2, section 18, of the *Commission for Children and Young People and Child Guardian Act 2000*.<sup>143</sup>

The information requested to inform the Commission’s assessment of compliance with section 83 of the *Child Protection Act 1999* was:

*All electronic records captured in ICMS, relating to a random sample (to be generated by the Department) of 400 placement decisions made for Aboriginal and Torres Strait Islander children and young people in the 2008/09 financial period (meaning, those children on a child protection order, in the custody or guardianship of the chief executive, who were known to be Indigenous at the time of the placement decision),<sup>144</sup> that will inform assessment of compliance against the five steps identified in the Compliance Assessment Tool (as attached). Based on current advice, this entails information recorded only in the following ICMS printouts:*

- 1.1 Case Plan form (containing the cultural support plan)
- 1.2 Recognised Entity /Child Placement Principle form
- 1.3 Recognised Entity Participation form
- 1.4 Placement Agreement form.

<sup>140</sup> Of the 12 outliers excluded, four were outside the audit reference period (2008/09), seven required further confirmation of the child’s cultural status and one was identified as a repeat.

<sup>141</sup> Advice provided by the Department of Communities on 13 July 2010.

<sup>142</sup> Advice provided by the Department of Communities on 13 July 2010.

<sup>143</sup> Now section 40 of the *Commission for Children and Young People and Child Guardian Act 2000*.

<sup>144</sup> This level of detail was included at the Department of Communities’ request to streamline the data extraction process from ICMS.

Additionally, agreement was reached with the Department of Communities that the Commission would electronically survey Child Safety Officers for one month in regard to their decision making processes for the placement decisions comprising the audit sample. The Commission also discussed and reached agreement with the Queensland Aboriginal and Torres Strait Islander Child Protection Peak on the same methodology for surveying Recognised Entities. A telephone participation option was additionally made available for Recognised Entities who may not have the resources necessary to participate in the survey electronically.

### 1.2.4 Information received to inform assessment of compliance

#### ICMS records

Relevant ICMS forms were provided by the Department of Communities for the 388 placement decisions comprising the audit sample.

The 'Recognised Entity/Child Placement Principle' form was provided for a little less than half (173 of 388, or 45%) of all placement decisions comprising the audit sample. This form captures specific information relevant to compliance with section 83 of the *Child Protection Act 1999*.

A supplementary 'Recognised Entity Participation' form was provided for 350 (or 90%) of the 388 placement decisions comprising the audit sample. This form captures the participation of a Recognised Entity relevant to any key decision making, not specifically the placement decision itself. Five (or 1%) of these forms specified that Recognised Entity participation was in regard to the placement decision for the child and were therefore used to inform the audit.<sup>145</sup>

There were 150 Placement Agreements and 330 Case Plans provided. A comprehensive review of these documents revealed that the information in these forms did not systematically capture the necessary information about the placement decision making process. Accordingly, information from the Placement Agreement and Case Plan were not used to directly inform the assessment of compliance with section 83 of the *Child Protection Act 1999*.

#### Surveys of Recognised Entities and Child Safety Officers

In March 2010, the Commission requested the Advisory Committee's feedback on the proposed content of the surveys. Feedback was incorporated into two electronic versions of the surveys using Microsoft SharePoint Services – one for Child Safety Officers and one for Recognised Entities. Both surveys were modelled on the key requirements of section 83 of the *Child Protection Act 1999* with a workflow to navigate participants through the survey.

The surveys were operational for one month, commencing on 1 June 2010 and closing on 30 June 2010. The Commission was expecting to receive 388 survey responses from Child Safety Officers (one for each placement decision comprising the audit sample) and 366 survey responses from Recognised Entities (slightly less as the Department of Communities advised that Recognised

<sup>145</sup> Of the remaining forms, 204 (53%) forms stated that RE participation was in relation to case planning, 112 (32%) forms did not state what the RE participation was in relation to, 21 (6%) forms stated that RE participation was in relation to an Investigation and Assessment, seven (2%) forms stated that RE participation was in relation to court and one form stated that RE participation was in relation to a Matter of Concern.

Entities were not involved in some placement decisions). To enable increased participation, the surveys were extended three times until the final close date on 13 August 2010.

The Commission received 359 responses from the Department of Communities and 135 responses from Recognised Entities. Preliminary review of the information captured indicated that a significant number of responses for both Child Safety Officers (98) and Recognised Entities (40) required further quality assurance to verify their validity. Specifically, the placement date recorded in the survey did not match the placement decision that a response was required for.

To ensure the final survey sample was as complete as possible, both Recognised Entities and Child Safety Officers were provided an opportunity to quality assure the survey responses in question over a six week timeframe.

A final valid sample of 298 Child Safety Officer survey responses and 99 Recognised Entity survey responses was received.

Part B of this report discusses the findings relevant to the Commission's assessment of the Department of Communities' compliance with section 83 of the *Child Protection Act 1999* using the methodology and information sources outlined.

### **1.3 Methodology for Part C - Outcomes achieved as a result of the Department of Communities' efforts to comply with section 83 of the Child Protection Act 1999**

#### **1.3.1 Established methodology**

The methodology established by the Commission for monitoring the outcomes experienced by Aboriginal and Torres Strait Islander children and young people in out-of-home care as a result of the Department of Communities' efforts to comply with section 83 of the *Child Protection Act 1999* entailed:

- Establishing key areas of focus for monitoring the outcomes experienced by Aboriginal and Torres Strait Islander children and young people in out-of-home care, and
- Monitoring the key areas of focus using child focused data captured by the Commission's Community Visitors (CVs) in their visits with Aboriginal and Torres Strait Islander children and young people in out-of-home care.

#### **1.3.2 Process for establishing the key areas of focus**

##### **Engagement with Aboriginal and Torres Strait Islander children and young people**

The Commission engaged directly with Aboriginal and Torres Strait Islander children and young people in out-of-home care (through CV visits between 11 August 2009 and 11 September 2009) to find out what they think is important in keeping children connected with their family, community and culture (as intended by section 83 of the *Child Protection Act 1999*) by asking:

*“What do you think helps kids feel connected to their Mob?”*

There were 136 Aboriginal and Torres Strait Islander children and young people in out-of-home care who responded to this question.<sup>146</sup> Thematic analysis of their responses revealed the following as important to keeping kids connected with their Mob:

- Family contact
- Contact with community members
- Participation in cultural activities and events
- Knowledge about family, community and culture.

### Literature review

To further inform this process, the Commission conducted a literature review to identify what is important for Aboriginal and Torres Strait Islander children and young people in out-of-home care, with a specific focus on their connection to family, community and culture (as intended by section 83 of the *Child Protection Act 1999*).

The literature review (Appendix 3) further reinforced the key themes identified through engagement with the Aboriginal and Torres Strait Islander children and young people. It also highlighted the importance of strong cultural identity, including the importance of knowledge of Mob, country and language.

Reconciling the findings from the Commission’s direct engagement with Aboriginal and Torres Strait Islander children and young people, and the literature review about keeping connected with family, community and culture, the Commission established four key areas of focus for monitoring the outcomes of Aboriginal and Torres Strait Islander children and young people placed in out-of-home care:

- Family contact
- Contact with community/people of significance
- Participation in cultural activities/events, and
- Cultural identity.

### 1.3.3 Information gathered to inform the assessment of outcomes

#### Commission Community Visitor reports about children and young people in care

Commission Community Visitors (CVs) regularly visit children and young people in out-of-home care to verify that they are safe, are receiving appropriate care, to advocate on their behalf to help resolve any concerns or grievances and to offer support if required. After each visit CVs prepare a written report about the standard of care experienced by the child. These reports are based on an independent assessment made by the CV. Information and evidence used to formulate the CV’s assessment is derived from multiple sources. Depending on the nature of the information these may be engagement and one-on-one discussions with the child during the visit, the CV’s observations of the standard of care provided during the visit and/or statements made by the child’s carer about the child.

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<sup>146</sup> Aged 9 to 17 and on a Child Protection Order who were visited by a CV between 11 August and 11 September 2009.

In 2009-10, an improved CV report framework was introduced within the Commission's information management system, Jigsaw, to enhance data management and reporting and individual and systemic advocacy by the Commission. The implementation involved a change in the way CVs record the information from their visits with children.<sup>147</sup> This enhanced way of reporting enables detailed data capture about care provided to a child, and becomes a particularly powerful tool when that information is analysed across groups of children for trends.

For the purpose of this audit, the Commission collated child focused data captured during their visits with 1109 distinct Aboriginal and Torres Strait Islander children and young people in out-of-home care in July 2010 to monitor outcomes relevant to their connection with family, community and culture. The CVs were asked to ensure they captured all necessary information in their CV reports for July 2010 to inform the Commission's assessment of the outcomes experienced by Aboriginal and Torres Strait Islander children and young people relevant to their connection to family, community and culture.

Part C of this report discusses the findings relevant to the Commission's assessment of outcomes experienced by Aboriginal and Torres Strait Islander children and young people in out-of-home care using the methodology and information sources outlined.

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<sup>147</sup> Previously, CVs rated the level of care provided against 17 standards of care on a 1-4 scale, they now provide yes/no responses to over 75 questions, categorise their concerns in additional sub-questions and provide some free text responses.

## Appendix 2

### Summary of the implementation update provided by the Department of Communities and the Commission's evaluation of implementation of the 28 recommendations made in the inaugural *Indigenous Child Placement Principle Audit Report 2008*

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
Step 1: Identifying an Indigenous child	1	The department develop guidelines for inclusion in/or in support of the Child Safety Practice Manual that assist and support departmental officers in establishing a child's cultural identity, including the criteria for identifying an Aboriginal and/or Torres Strait Islander person.	Information has been included in the Child Safety Practice Manual (CSPM) to ensure that departmental officers identify and record a child's cultural identity. The approved definitions for an Aboriginal person and Torres Strait Islander person have also been included in the Glossary in the CSPM and in the Department of Communities' practice resources, 'The Child Placement Principle', 'Developing a cultural support plan for an Aboriginal and Torres Strait Islander child' and 'Working with Aboriginal and Torres Strait Islander People'.	<p>Implemented.</p> <p>Collectively, the Child Safety Practice Manual (CSPM) and the Practice Resources provide departmental officers adequate guidance to establish a child's cultural identity.</p> <p>In particular, the guidance included in 'The Child Placement Principle' Practice Resource meets the requirement to provide a criteria for identifying an Aboriginal and/or Torres Strait Islander person.</p> <p>The resources also refer to the importance of confirming the child's cultural status in collaboration with the Recognised Entity.</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
Step 2: Involvement of Recognised Entities	2	<p>The department develop guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in:</p> <ul style="list-style-type: none"> <li>– understanding the participation process with a Recognised Entity (including the local nature of relationship development), and</li> <li>– giving the Recognised Entity an opportunity to participate in the placement decision-making process (in accordance with section 83(2) of the <i>Child Protection Act 1999</i>).</li> </ul> <p>These guidelines should include (but not be limited to) details of how the Recognised Entity's expertise will:</p> <ul style="list-style-type: none"> <li>– provide cultural information complying with the Child Placement Principle</li> <li>– enhance the department's understanding of the child's family and community structures and relationships</li> <li>– provide support by identifying placement options</li> <li>– provide opinions about the suitability of placement options, and</li> <li>– provide advice on how to: <ul style="list-style-type: none"> <li>▪ retain relationships with Indigenous family and community</li> <li>▪ facilitate contact with Indigenous family and community, and</li> <li>▪ preserve and enhance the child's sense of Indigenous identity.</li> </ul> </li> </ul>	<p>Information has been included at multiple points across the CSPM about the Recognised Entity's participation in information gathering, planning and decision-making.</p> <p>The significance of the Recognised Entity's participation is reflected in two overarching policy statements, 'Working with Aboriginal and Torres Strait Islander children, families and communities' and 'The Aboriginal and Torres Strait Islander Child Placement Principle'.</p> <p>Detailed information has also been included in the Department of Communities' practice resources, 'The Child Placement Principle', 'Working with the Recognised Entity' and 'Developing a cultural support plan for an Aboriginal and Torres Strait Islander child', and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Implemented.</p> <p>Collectively, the CSPM and the nominated Practice Resources, in particular the 'Working with Recognised Entity' Practice Resource, comprehensively outline the participation and consultation processes with Recognised Entities in decisions for Aboriginal and Torres Strait Islander children and young people. They also provide detailed guidance on the role of both Recognised Entities and departmental officers in the collaborative decision making process and specify the information that is to be obtained and recorded from the Recognised Entity.</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
Step 2: Involvement of Recognised Entities	3	<p>The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual to assist and support departmental officers in the consultation process with Recognised Entities that must occur after a placement decision was made without the participation of the Recognised Entity. These guidelines should address:</p> <ul style="list-style-type: none"> <li>- The local nature of relationship development with Recognised Entities</li> <li>- What is an acceptable time frame for 'as soon as practicable'?</li> <li>- What circumstances can be considered to be 'urgent'?</li> <li>- What information and advice should be sought during consultation with the Recognised Entity?</li> <li>- What are the expected outcomes from the consultation process?</li> <li>- In what circumstances should a decision be reviewed because of the views of the Recognised Entity?</li> </ul>	<p>Information has been included in the CSPM about consulting with the Recognised Entity as soon as practicable after a decision was made in relation to an Aboriginal or Torres Strait Islander child where departmental officers were not able to consult prior to or during the decision making process. The CSPM directs departmental officers to record information about circumstances that were deemed to be urgent including how and when the Recognised Entity was consulted, why the matter required urgent action, attempts made to consult with the Recognised Entity, where the child had been placed, information that guided the choice of placement, information about placement options investigated and attempts following an initial placement with a non-Indigenous carer to then locate a placement that complied with section 83 of the <i>Child Protection Act 1999</i>.</p> <p>Information about consultation with the Recognised Entity after the placement decision has also been included in the Department of Communities' practice resources, in particular 'The Child Placement Principle' and 'Working with the Recognised Entity'.</p>	<p>Implemented.</p> <p>Collectively, the CSPM and Practice Resources capture the intent of this recommendation.</p> <p>The resources communicate the importance of facilitating a positive relationship with Recognised Entities at the local level. In particular, the 'Working with the Recognised Entity' Practice Resource instructs departmental officers on the need to develop local protocols in partnership with the relevant Recognised Entity.</p> <p>The Practice Resources and CSPM also communicate the importance of consultation with the Recognised Entity as soon as practicable after a placement decision has been made in urgent circumstances and the importance of recording information about why the officer believed urgent action was required, what information guided the decision and how and when the officer consulted with the Recognised Entity about the placement decision.</p> <p>The resources do not provide comprehensive guidance about what constitutes 'as soon as practicable' and 'urgent'. However, based on the Advisory Committee's advice, the Commission</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
				accepts that these words assume their ordinary meaning when being interpreted by departmental officers and that departmental officers now have sufficient policy and procedural guidance to inform their practice.
Step 2: Involvement of Recognised Entities	4	The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow recording of whether a placement decision was made because of urgent circumstances.	<p>An enhancement to ICMS, making the question "was this placement due to urgent circumstances?" and the "rationale for placement decision" text box mandatory within the 'Recognised Entity/Child Placement Principle' form, for all placements, is scheduled to enter production in March 2012.</p> <p>Policy and procedures have also been amended and now require that departmental staff record information about circumstances that were deemed to be urgent, including how and when the Recognised Entity was consulted, why the matter required urgent action, attempts made to consult with the Recognised Entity, where the child had been placed, information that guided the choice of placement, information about placement options investigated and attempts following an initial placement with a non-Indigenous carer to then locate a placement that complied with section 83 of the <i>Child Protection Act 1999</i>.</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>
Step 3: Hierarchy of placement	5	The department develop guidelines that explain: <ul style="list-style-type: none"> <li>– the types of relationships that exist in</li> </ul>	Guidance is provided to departmental officers in the CSPM about gathering information about the child's family, their relationships, their community	Implemented.

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
options		<p>Aboriginal and Torres Strait Islander families and communities</p> <ul style="list-style-type: none"> <li>- information about Torres Strait Islander child rearing practices or 'traditional adoptions' needs to be included, and</li> <li>- the importance of departmental officers collecting and recording an Indigenous child's family and community structure to ensure appropriate and effective service delivery to Indigenous children.</li> </ul>	<p>and traditional practices.</p> <p>The importance of this information is restated in the two overarching policy statements, 'Working with Aboriginal and Torres Strait Islander children, families and communities' and the 'Aboriginal and Torres Strait Islander Child Placement Principle'.</p> <p>Information to this effect has also been included in the Department of Communities' practice resources, 'The Child Placement Principle', 'Working with the Recognised Entity', 'Developing a cultural support plan for an Aboriginal and Torres Strait Islander child', and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Collectively, the CSPM and Practice Resources specify the types of relationships that exist in Aboriginal and Torres Strait Islander families. Specifically, the glossary of terms that is contained in the Practice Resources provide a comprehensive definition of extended family. The overarching policy statement titled 'Aboriginal and Torres Strait Islander Child Placement Principle' also provides an understanding of the family members that are involved in an Aboriginal and/or Torres Strait Islander child's life.</p> <p>The CSPM specifies the consideration that is to be given to the different child rearing practices of Aboriginal and Torres Strait Islander families. It refers to the earlier independence of children, children taking responsibility at an earlier age, cultural authority within kinship/clan groups and cultural responsibility among the extended family and community.</p> <p>In addition, the CSPM and the Practice Resources highlight the importance of departmental officers collecting and recording advice about the child's family, community and relationships. Specifically, 'The Child Placement Principle' Practice Resource specifies that detail about the child's family should be recorded in an ecomap or genogram in ICMS.</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
Step 3: Hierarchy of placement options	6	The department develop comprehensive guidelines to support departmental officers in differentiating between family and community members for the purpose of section 83 of the <i>Child Protection Act 1999</i> .	<p>Guidance has been included in the CSPM relevant to obtaining information from the child's family and the Recognised Entity about suitable placement options from within the child's family and community. This information can then be used to inform decision making about the child's placement in accordance with section 83 of the <i>Child Protection Act 1999</i>.</p> <p>Information to this effect has also been included in the Department of Communities' practice resources, 'The Child Placement Principle' and 'Working with the Recognised Entity', and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Implemented.</p> <p>The CSPM and Practice Resources provide guidance to departmental officers to consult with the Recognised Entity to identify relevant family and community for the purposes of identifying possible placement options. In addition, the glossary included in the Practice Resources provides a comprehensive explanation of key concepts relating to family and community.</p>
Step 3: Hierarchy of placement options	7	The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in collecting information about family and community members before an Indigenous child's initial placement (if possible). These guidelines should also address the approach that departmental officers should take if the information required is not available.	<p>Information has been included in the CSPM about consulting with the family and the Recognised Entity to gather information about suitable individuals from within the child's family and community who would be willing and able to provide care.</p> <p>Information has also been included in the practice resources, 'The Child Placement Principle', 'Working with the Recognised Entity', and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Implemented.</p> <p>The CSPM and the Practice Resources refer to gathering information about the child's family, community and culture to inform decision making. They largely focus on the role of the RE in collecting the relevant family, community and cultural information.</p> <p>The CSPM also specifies that where there is insufficient information available to identify a suitable kinship care option for the child (ie. lack of information about family and community), the child will be placed in</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
				another placement in the interim with the decision to be reviewed when an informed decision is possible.
Step 3: Hierarchy of placement options	8	<p>The department enhance the ICMS person record to allow:</p> <ul style="list-style-type: none"> <li>- the relationship tab to provide drop-down fields that are relevant to Indigenous family and community relationships, and</li> <li>- the mandatory inclusion of the information currently captured in the cultural support plan section in the case plan form.</li> </ul>	<p>The Relationships table in ICMS was updated on 27 September 2008 to include Aboriginal and Torres Strait Islander kinship relationships.</p>	<p>Implemented.</p> <p>The relationship tab in ICMS captures fields relevant to Aboriginal and Torres Strait Islander family and community relationships (ie. 1. father – Aboriginal kinship 2. mother – Aboriginal kinship 3. Father -Torres Strait Islander custom 4. Mother Torres Strait Island custom etc).</p> <p>Details about the clan/language/community group for the relevant person are captured in a number of places, including the person record and Carer Agreement.</p>
Step 3: Hierarchy of placement options	9	<p>The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in identifying the role that family and community members can play while the child is in out-of-home care – specifically, whether or not family and community members are willing and able to be considered as placement options. Categories similar to those developed by the Victorian Department of Human Services should be considered for</p>	<p>Information has been included in the CSPM relevant to consulting with the family and the Recognised Entity to gather information about individuals who are willing and able to provide a range of support to a child. This information can then be considered during the development of the child's cultural support plan and case plan, including the suitability of individuals to be kinship or respite carers and arrangements for contact.</p> <p>The two policy statements also identify the</p>	<p>Implemented.</p> <p>Collectively, the CSPM and Practice Resources provide guidance that the departmental officer should consult with the Recognised Entity to identify potential suitable family or community members who may be able to provide a placement for the child.</p> <p>In addition, the resources refer to the</p>

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
		classification, including: <ul style="list-style-type: none"> <li>- care/support not appropriate</li> <li>- willing to provide support when they can</li> <li>- would like to provide support but will experience difficulties</li> <li>- cannot provide support</li> <li>- is prepared to provide support, and</li> <li>- is prepared to be considered as a placement option.</li> </ul>	importance of maintaining links with family and community for development of an Aboriginal and Torres Strait Islander child's identity.  Information to this effect has been included in the practice resources, 'Working with the Recognised Entity' and 'Developing a cultural support plan for an Aboriginal or Torres Strait Islander child' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.	importance of identifying opportunities to maintain the child's contact with family while they are placed in care, including identifying possible respite options where possible.
Step 3: Hierarchy of placement options	10	The department enhance the ICMS recognised entity/Child Placement Principle form to allow for recording of placement options identified from family and community members. The information to be collected in the ICMS could include details of the placement options as well as whether the family and community members are willing and able to be considered.	Enhancements to ICMS, allowing the 'Recognised Entity/Child Placement Principle' form to record all placement options identified, including if these were from family and community members, are scheduled to enter production in March 2012. This will also include details of the placement options as well as whether the family and community members are willing and able to be considered.  Current policy and procedures also require that departmental officers record information about placement options investigated and impediments to the use of placement options that complied with the hierarchy of placements outlined in section 83 of the <i>Child Protection Act 1999</i> .	Implementation underway.  The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.
Step 3: Hierarchy of	11	The department develop comprehensive guidelines for inclusion in the Child Safety	Information has been included in the CSPM about consulting with the child's family and the	Implemented.

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placement options		<p>Practice Manual that assist and support departmental officers in:</p> <ul style="list-style-type: none"> <li>- understanding the concept of a compatible Indigenous carer</li> <li>- gathering relevant information to decide if an Indigenous carer is compatible with an Indigenous child, and</li> <li>- making a decision about an Indigenous carer's compatibility with an Indigenous child.</li> </ul>	<p>Recognised Entity to gather information about individuals, within the child's family and community, who would be compatible carers.</p> <p>The two policy statements also identify the importance of maintaining links with family and community for development of an Aboriginal and Torres Strait Islander child's identity.</p> <p>Information to this effect has also been included in the practice resources, 'Working with the Recognised Entity' 'Developing a cultural support plan for an Aboriginal or Torres Strait Islander child' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Collectively, the CSPM and the Practice Resources provide comprehensive guidance to departmental officers about understanding and determining compatibility.</p> <p>'The Child Placement Principle' Practice Resource, 'Working with the Recognised Entity' Practice Resource and the CSPM reinforce the importance of consulting with the Recognised Entity to identify a compatible placement for the child. 'The Child Placement Principle' Practice Resource specifically refers to identifying the factors that would make a potential carer or placement option compatible or incompatible with the child's needs.</p> <p>In addition, the glossary included in the CSPM provides a definition of 'compatible', referring the departmental officer to engage with the Recognised Entity, family, community leaders and elders on a case by case basis to gather information and determine compatibility of a potential carer.</p>
Step 3: Hierarchy of placement options	12	The department enhance the ICMS to allow for recording of Indigenous carers' cultural information.	The person record in ICMS at present allows for such information to be recorded.	<p>Implemented.</p> <p>The person record in ICMS captures the relevant cultural information (ie. Indigenous status, Indigenous community/language</p>

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				<p>group).</p> <p>In addition, the Carer Assessment (the key document for recording and assessing the carer's suitability) contains comprehensive cultural information about the carer.</p>
Step 3: Hierarchy of placement options	13	<p>The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow recording of:</p> <ul style="list-style-type: none"> <li>- Indigenous placement options identified (outside the family and community)</li> <li>- whether or not the Indigenous carer is compatible for the purpose of section 83 of the <i>Child Protection Act 1999</i>, and</li> <li>- how the decision to assess the Indigenous carer as compatible or incompatible was reached.</li> </ul>	<p>Enhancements to ICMS, allowing the 'Recognised Entity/Child Placement Principle' form to record all placement options identified are scheduled to enter production in March 2012.</p> <p>Each placement option will identify their relationship priority based on section 83 (4 &amp; 6) of the <i>Child Protection Act 1999</i>. This will include if an Aboriginal person or Torres Strait Islander has been identified as "compatible with the child's community or language group" (83 (3)(c)).</p> <p>Within the 'rationale for placement decision' section of the form, users are specifically asked 'where a placement is determined as 'compatible with' the child's community or language group, include information about how this was assessed'.</p> <p>Since the 2008 report, the term 'compatible' has been defined in the CSPM. This is the definition to be used by staff if they identify a person as compatible within this form.</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>

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Step 3: Hierarchy of placement options	14	<p>The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in:</p> <ul style="list-style-type: none"> <li>- understanding the concept of 'near' for the purpose of section 83 of the <i>Child Protection Act 1999</i>, and</li> <li>- making a decision about whether a placement option is 'near' an Indigenous child's family or community. This process should include: <ul style="list-style-type: none"> <li>- reviewing location details about the child's family and community</li> <li>- reviewing location of placement options with non-Indigenous carers</li> <li>- identifying if the placement option is 'near' the child's family</li> <li>- identifying if the placement option is 'near' the child's community, and</li> <li>- reconciling a placement decision if the location is 'near' one family/community member and not another.</li> </ul> </li> </ul>	<p>A definition of 'near' has been included in the glossary of terms in the CSPM and in the practice resources.</p> <p>Information has also been included in the CSPM about consulting with the Recognised Entity to ascertain if a placement is 'near' family and/or community.</p> <p>Similar information has also been included in the practice resource, 'The Child Placement Principle' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>Implemented.</p> <p>'The Child Placement Principle' Practice Resource refers to engaging with the Recognised Entity and Aboriginal and Torres Strait Islander placement service (where relevant) to determine if a placement option is considered 'near' for a particular child. This document also refers to the importance of recording information about 'location'.</p>
Step 3: Hierarchy of placement options	15	<p>The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow recording of:</p> <ul style="list-style-type: none"> <li>- non-Indigenous placement options identified near the child's family and/or community, and</li> <li>- how the decision to assess the non-</li> </ul>	<p>Enhancements to ICMS, allowing the 'Recognised Entity/Child Placement Principle' form to record all placement options identified are scheduled to enter production in March 2012.</p> <p>Each placement option will identify their relationship priority based on section 83 (4 &amp; 6)</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>

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		Indigenous carer as near the family and/or community was reached.	<p>of the <i>Child Protection Act 1999</i>. This will include if a person has been identified as "near" the child's family, community or language group.</p> <p>Within the 'rationale for placement decision' section of the form, users are specifically asked 'where a placement is determined as 'near' the child's community or language group, include information about how this was assessed.'</p> <p>Since the 2008 report, the term 'near' has been defined in the CSPM. This is the definition to be used by staff if they identify a person as near within this form.</p>	
Step 3: Hierarchy of placement options	16	The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in identifying appropriate placement options for Indigenous children when the options set out in section 83(4) and (6) of the <i>Child Protection Act 1999</i> have been exhausted.	<p>Information is included in the CSPM about the departmental officer's roles and responsibilities when an Aboriginal or Torres Strait Islander child has been placed with a non-Indigenous carer. This includes regularly reviewing the placement and continuing to attempt to locate a placement that complies with the hierarchy of placements outlined in section 83 of the <i>Child Protection Act 1999</i>.</p> <p>The overarching policy statement also identifies the importance for an Aboriginal and Torres Strait Islander child to be cared for by a member of their own family or community.</p> <p>Information to this effect has also been included</p>	<p>Implemented.</p> <p>Collectively, the CSPM and the nominated Practice Resources communicate the need to consult with the Recognised Entity, family and community members when making placement decisions. They provide clear direction about the need to review placement decisions where the child has not been placed with an Aboriginal and/or Torres Strait Islander carer.</p> <p>The CSPM also refers to placement matching principles to assist the departmental officers in locating a suitable placement for the child. It additionally</p>

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			<p>in the practice resources, 'Working with the Recognised Entity', 'Developing a cultural support plan for an Aboriginal or Torres Strait Islander child' and 'The child placement principle' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>specifies that where a child requires a placement with another entity (section 82(1)(f)) the RE must be involved in the assessment to ensure the placement is able to facilitate family and cultural contact.</p> <p>Additionally, the Placement Services Unit assists departmental officers in locating placement options.</p>
Step 3: Hierarchy of placement options	17	The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow recording of placement options identified outside the hierarchy of placement options in section 83(4) and (6) of the <i>Child Protection Act 1999</i> .	<p>Enhancements to ICMS, allowing the 'Recognised Entity/Child Placement Principle' form to record all placement options identified are scheduled to enter production in March 2012.</p> <p>Each placement option will identify their relationship priority based on section 83 (4 &amp; 6) of the <i>Child Protection Act 1999</i>.</p> <p>Current policy and procedures also require that departmental officers record information about placement options investigated, why a placement option was deemed unsafe or unsuitable and the rationale for placing a child with a non-Indigenous carer.</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>
Step 4: Proper consideration of placement	18	The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in collecting information about the relationships between	Procedures outlined in the CSPM require departmental officers to obtain information from family and the Recognised Entity about a child's relationships with their parents, siblings, extended family and significant individuals within	<p>Implemented.</p> <p>Collectively the CSPM and Practice Resources refer to the importance of the</p>

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options		Indigenous children and their parents, siblings and people of significance.	<p>their community.</p> <p>The overarching policy statements also highlight the importance for an Aboriginal or Torres Strait Islander child to maintain their relationships with family and community.</p> <p>Information to this effect has also been included in the practice resources 'Working with the Recognised Entity', 'Developing a cultural support plan for an Aboriginal or Torres Strait Islander child', 'The child placement principle' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	departmental officer identifying and capturing information about the child's family, community and relationships. The resources instruct the departmental officer to do this in collaboration with the Recognised Entity.
Step 4: Proper consideration of placement options	19	The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow for recording of details of the child's relationships with parents, siblings and people of significance.	<p>Relevant information about children used to inform placement decisions is currently recorded within ICMS. A child's relationships with parent's siblings and people of significance are recorded in the Person Profile and key documents including the Child Strength and Needs Assessment and the Case Plan. Recording this information in these locations is considered to be the appropriate record keeping method.</p> <p>Current policy and procedures also require that departmental officers record information about the child's Aboriginal or Torres Strait Islander status and their relationships with family members and other individuals from within their community who are significant in their life.</p>	<p>Implemented.</p> <p>Record keeping in ICMS captures information about the child's relationships with parents, siblings and people of significance.</p>

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Step 4: Proper consideration of placement options	20	<p>The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that will assist and support departmental officers in assessing the placement option's ability to retain the child's relationships with parents, siblings and people of significance. The following questions should be addressed by the guidelines:</p> <ul style="list-style-type: none"> <li>- Will the placement option provide a supportive environment that allows the retention of the child's relationships with parents, siblings and people of significance?</li> <li>- Will the placement option enable contact with parents, siblings and people of significance?</li> <li>- Are there any factors that would prevent/hinder the relationships with parents, siblings and people of significance.</li> </ul>	<p>Information has been included in the CSPM about ensuring that the child's case plan and cultural support plan maintain the child's cultural identity and his or her contact with family, community and significant individuals within their network.</p> <p>The two overarching policy statements also identify the importance for an Aboriginal and Torres Strait Islander child to maintain their links with their family and community for the development of their identity.</p> <p>Information to this effect has also been included in the practice resources, 'Working with the Recognised Entity', 'Developing a cultural support plan for an Aboriginal or Torres Strait Islander child' and 'The child placement principle'.</p>	<p>Implemented.</p> <p>Collectively, the CSPM and Practice Resources refer to the importance of ensuring the child's placement maintains their connection to family and community and directs the departmental officers to consult with the Recognised Entity to identify the appropriate family and community structures and placement options to fulfil this.</p> <p>The suite of documents do not contain prescriptive guidance on how the departmental officer should make their assessment about whether the placement will allow for the optimal retention of relationships with key people. Instead, they incorporate the intent of this recommendation by ensuring departmental officers are considering these factors and allowing departmental officers to apply their personal expertise in making the assessment.</p>
Step 4: Proper consideration of placement options	21	<p>The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow recording of consideration given to a placement option's ability to retain the child's relationships with parents, siblings and people of significance.</p>	<p>Enhancements to ICMS include amendments to the 'Recognised Entity/Child Placement Principle' form to record the question "Has proper consideration been given to the placements ability to ensure optimal retention of the child's relationships with parents, siblings and other people of significance under Aboriginal</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>

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			<p>tradition or Island custom? On answering no, reasons why proper consideration was not given must be entered.</p> <p>Within the 'rationale for placement decision' section of the form, users are specifically advised 'You must also discuss how the carer was assessed regarding their ability to help retain the child's family, community and cultural connections.'</p> <p>These enhancements are scheduled to enter production in March 2012. Each placement option will identify their relationship priority based on section 83 (4 &amp; 6) of the <i>Child Protection Act 1999</i>.</p>	
Step 4: Proper consideration of placement options	22	<p>The department develop comprehensive guidelines for inclusion in/or support of the Child Safety Practice Manual that assist and support departmental officers in considering the views of the Recognised Entity, including (but not limited to):</p> <ul style="list-style-type: none"> <li>- involvement in the decision-making process</li> <li>- views expressed during the decision-making process, and</li> <li>- areas of disagreement with the department.</li> </ul>	<p>Information has been included at multiple points across the CSPM about the Recognised Entity's participation in information gathering, planning and decision making.</p> <p>The significance of the Recognised Entity's participation is reflected in the two overarching policy statements, 'Working with Aboriginal and Torres Strait Islander children, families and communities' and 'The Aboriginal and Torres Strait Islander Child Placement Principle'.</p> <p>Detailed information has also been included in the practice resources, in particular 'The child</p>	<p>Implemented.</p> <p>The resources duly note the importance of ensuring a Recognised Entity is involved in a placement decision for an Aboriginal or Torres Strait Islander child and note the importance of recording the information and views provided by the Recognised Entity. The 'Working with the Recognised Entity' Practice Resource also provides guidance to departmental officers on what to do when a difference of opinion arises between the Department and the Recognised Entity, instructing them to ensure a senior officer has been consulted and is aware of the</p>

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			<p>placement principle', 'Working with the Recognised Entity' and 'Developing a cultural support plan for an Aboriginal and Torres Strait Islander child' and the practice paper 'Working with Aboriginal and Torres Strait Islander People'.</p>	<p>decision being made, and ensure the decision, rationale and consultation processes are recorded in ICMS and communicated to the Recognised Entity.</p>
<p>Step 5: Non- Indigenous carers' commitment</p>	<p>23</p>	<p>The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in assessing a non-Indigenous carer's commitment in accordance with the <i>Child Protection Act 1999</i>. The assessment process should include (but not be limited to):</p> <ul style="list-style-type: none"> <li>- the department identifying and recording what its expectation is of the non-Indigenous carer to:</li> <li>- facilitate contact between the child and family members</li> <li>- help maintain contact with the child's community or language group</li> <li>- help maintain a connection with the child's Aboriginal or Torres Strait Islander culture, and</li> <li>- preserve and enhance the child's sense of Aboriginal or Torres Strait Islander identity</li> <li>- the department providing details of its expectations to the non-Indigenous carer</li> <li>- the non-Indigenous carer's response to the department's expectations (including any support that may need to be</li> </ul>	<p>Information has been included in the CSPM about the need for Child Safety Services staff to ensure that a carer who is not Aboriginal or Torres Strait Islander is able to demonstrate their commitment to meeting the contact and cultural needs of the Aboriginal or Torres Strait Islander child placed in their care.</p> <p>Departmental procedures also require that this commitment be documented in the Placement Agreement.</p> <p>The overarching policy statement 'The Aboriginal and Torres Strait Islander Child Placement Principle' also outlines requirements when a child is placed with a carer who is not an Aboriginal or Torres Strait Islander person.</p> <p>Information has also been included in the practice resource 'The Child Placement Principle'.</p>	<p>Implemented.</p> <p>The CSPM and Practice Resources refer to the need to consider the non-Indigenous carer's commitment to maintaining the child's connection to family, community in accordance with section 83(7). Specifically, 'The Child Placement Principle' Practice Resource specifies that these commitments must be documented in the Placement Agreement and signed by the carer.</p> <p>The suite of documents do not contain prescriptive guidance on how the departmental officer should make their assessment about the non-Indigenous carer's commitment. Instead, they incorporate the intent of this recommendation by ensuring departmental officers are considering these factors and allowing departmental officers to apply their personal expertise in making the assessment.</p>

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		<p>provided by the department to the non-Indigenous carer), and</p> <ul style="list-style-type: none"> <li>– a written commitment from the non-Indigenous carer to meet the department's expectations.</li> </ul>		
Step 5: Non- Indigenous carers' commitment	24	The department enhance the ICMS Recognised Entity/Child Placement Principle form to allow for recording of the assessment of the non-Indigenous carer's commitment in accordance with section 83(7) of the <i>Child Protection Act 1999</i> .	<p>Enhancements to ICMS include amendments to the 'Recognised Entity/Child Placement Principle' form to record if all carers have committed to each section (a to d) of section 83(7) of the <i>Child Protection Act 1999</i> and, in making the placement decision, if proper consideration has been given to this. Within the 'rationale for placement decision' section of the form, users are specifically asked to discuss how the carer was assessed regarding section 83(7).</p> <p>Current policy and procedures also require that departmental officers record, in the Placement Agreement, information about the non-Indigenous carer's willingness and ability to comply with the requirements outlined in the legislation, policy and procedures.</p>	<p>Implementation underway.</p> <p>The requisite enhancements to ICMS have been prioritised and are scheduled to enter production in March 2012.</p>
Steps 1-5: General compliance	25	Recommendations 1, 2, 3, 5, 6, 7, 9, 11, 14, 16, 18, 20 and 22 are responded to in a way that results in one comprehensive procedure, to be included in/or in support of the Child Safety Practice Manual. Situations that may require further guidance should be	<p>Departmental officers now have access to a comprehensive suite of policies, procedures and practice resources that guide their intervention with Aboriginal and Torres Strait Islander children, families and communities.</p> <p>These documents include:-</p>	<p>Implemented.</p> <p>Collectively the CSPM and practice papers provide detailed guidance to departmental officers about the application of section 83 of the <i>Child Protection Act 1999</i>, including</p>

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		<p>considered for inclusion, such as:</p> <ul style="list-style-type: none"> <li>- approach to the Child Placement Principle when children have mixed heritage</li> <li>- approach to placing large sibling groups</li> <li>- placement of children long distances away from their communities</li> <li>- contact with family and community – family not wanting contact and child not wanting contact</li> <li>- approach to placement of disabled Indigenous children</li> <li>- parental requests for non-Indigenous placements</li> <li>- emergency placements.</li> </ul> <p>As well, all other references to the Child Placement Principle in the Child Safety Practice Manual will need to refer to the specific procedural document.</p>	<ul style="list-style-type: none"> <li>- Specific provisions within the Act;</li> <li>- Two overarching policy statements;</li> <li>- Four practice resources; and</li> <li>- Extensive references across the majority of chapters in the CSPM.</li> </ul>	<p>the additional areas for consideration.</p>
Steps 1-5: General compliance	26	<p>The department develop training for departmental officers about the application of section 83 of the <i>Child Protection Act 1999</i>. This training should be rolled out once all procedural recommendations of this report have been implemented.</p>	<p>The Learning Solutions Unit is currently undertaking a continuous improvement process and reviewing the Child Safety Officer (CSO) Entry Level Training Program (ELTP). This review will include the incorporation of all procedural updates implemented in response to the <i>Indigenous Child Placement Principle Audit Report 2008</i>. During this process, the Learning Solution Unit will consult with the Child Protection Development and Child Safety Practice Improvement to ensure that the new training package aligns with Departmental policy</p>	<p>Implementation underway. The requisite enhancements to training have been identified and are scheduled for completion in April 2012.</p>

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			<p>and practice requirements. It is expected that this review will be completed by April 2012.</p> <p>ELTP is a structured 72 week program comprising a number of different phases.</p> <ul style="list-style-type: none"> <li>• Phase 1: Workplace orientation</li> <li>• Phase 2: Face to Face problem solving (including Foundation Studies in Culture)</li> <li>• Phase 3 &amp; 5: Workplace learning activities (Verification of Competence, Workplace Learning Guide)</li> <li>• Phase 4: Face to face consolidation workshops.</li> </ul> <p>Working with Aboriginal people and Torres Strait Islander people is integrated throughout the program. Specifically, section 83 of the <i>Child Protection Act 1999</i> is covered in the following ways:</p> <ul style="list-style-type: none"> <li>• During Phase 1 of CSO ELTP, CSOs are required to observe and discuss the work of experienced CSOs in the service centre. In preparation for one of these discussions, new CSOs are required to read sections 6 and 83 of the <i>Child Protection Act 1999</i> to explore how these sections impact on the work carried out in the service centre.</li> <li>• During phase 2 of CSO ELTP, all CSOs are required to participate in a 2 day workshop 'Foundation Studies in Culture – Indigenous Engagement.' During this targeted two days of training CSOs are informed and engaged in activities that focus on the sections of the</li> </ul>	

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			<p><i>Child Protection Act 1999</i> that apply specifically to Aboriginal and Torres Strait Islander children namely:</p> <ul style="list-style-type: none"> <li>- Section 6 - Provisions for Indigenous children</li> <li>- Section 83 - Aboriginal and Torres Strait Islander Child Placement Principle</li> <li>- Section 88 - Contact arrangements for Aboriginal and Torres Strait Islander children</li> <li>- Section 246 (l) - Roles and functions of the Recognised Entity.</li> </ul> <ul style="list-style-type: none"> <li>• CSOs work through a number of case scenarios that focus on the application of the <i>Child Protection Act 1999</i> and guiding policies and procedures. All case scenarios incorporate Aboriginal and Torres Strait Islander practice topics, including section 83, the Aboriginal and Torres Strait Islander Child Placement Principle.</li> <li>• During phases 3 &amp; 5 of CSO ELTP, CSOs are required to provide evidence of how they have demonstrated competence when working with Aboriginal and Torres Strait Islander people and the Recognised Entities, which covers the requirements of section 83 of the <i>Child Protection Act 1999</i>. This evidence is signed off by the CSOs Team Leader and may take the form of: <ul style="list-style-type: none"> <li>- Direct observation in the workplace</li> <li>- Recent samples of work</li> <li>- Third party verification</li> <li>- Oral questioning.</li> </ul> </li> </ul>	

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			<p>CSOs are required to provide evidence that they have demonstrated competence when:</p> <ul style="list-style-type: none"> <li>• Working with Aboriginal and Torres Strait Islander families (Mandatory) <ul style="list-style-type: none"> <li>- Explores with the client who they identify as their family and the roles each person adopts within the family to place the child in terms of the Child Placement Principles.</li> </ul> </li> <li>• Working with Recognised Entities (Mandatory) <ul style="list-style-type: none"> <li>- Works collaboratively with the Recognised Entity by including them in the decision making process at all key decision making points and discusses the child protection concerns in the context of culture.</li> <li>- Explores, with the assistance of the Recognised Entity, who the client identifies as their family and the roles each person adopts within the family and records this in case notes.</li> </ul> </li> </ul>	
Steps 1-5: General compliance	27	The department consider the introduction of specialised positions that case manage only Aboriginal and Torres Strait Islander children. These positions could allow effective engagement with the Recognised Entity and local community members. Expertise in applying the Child Placement Principle would also be developed by the departmental officers.	The department has maintained funded Child Safety Support Officer (CSSO) positions at the AO2, AO3 and AO4 level. This cohort provides a strong resource base to facilitate family contact for Aboriginal and Torres Strait Islander children in contact with the Child Safety service system. The AO4 position is an identified position with a strong focus on supporting the development of key contacts in the Indigenous community, provision of cultural advice, provision	Implemented. The Department of Communities has appropriately considered the possibility of introducing specialised positions to case manage Aboriginal and Torres Strait Islander children and young people.

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
			<p>of advice in relation to the Child Placement Principle, and support to Aboriginal and Torres Strait Islander children and their case managers.</p> <p>The department established Placement Coordination Units in each zone. In Central Zone, consideration is being given to converting a current PO2 position to an identified AO4 position to enable recruitment of an Aboriginal or Torres Strait Islander officer. In Northern Zone, Aboriginal and Torres Strait Islander workers manage placements for all Aboriginal and Torres Strait Islander children, and in Far North Queensland Zone, 3 AO4 identified positions work in the Kinship and Foster Care Team with Aboriginal and Torres Strait Islander carers. In Greater Brisbane Region, 2 project officer positions were established to identify family members for Aboriginal and Torres Strait Islander children, including research and genograms and liaison with Ganyjuu Foster and Kinship Care Service</p> <p>The department has also focussed on recruitment and retention of specified and identified positions, including CSSO positions, and specifically support CSSOs to complete a certificate IV Diploma in Child Protection, and an approved pilot for 20 CSSOs to undertake a Graduate Certificate in Child Protection, making them eligible for employment as a CSO.</p>	
Steps 1-5: General	28	That the ICMS Recognised Entity/Child Placement Principle form is enhanced to	Enhancements to ICMS, relevant to the implementation of recommendations from the	Implementation underway. The requisite enhancements to ICMS have

Compliance Step	Rec #	Recommendation	Summary of action taken by the Department of Communities to implement the recommendation	Commission's evaluation of implementation
compliance		include Recommendations 4, 8, 10, 12, 13, 15, 17, 19, 21 and 24.	<i>Indigenous Child Placement Principle Audit Report 2008</i> , are scheduled to enter production in March 2012.	been prioritised and are scheduled to enter production in March 2012.

# Appendix 3

## Literature review

The Commission conducted a literature review to identify what is important for Aboriginal and Torres Strait Islander children and young people in out-of-home care, with a specific focus on their connection to family, community and culture. This literature review was conducted to complement the views captured during the Commission Community Visitor direct engagement with Aboriginal and Torres Strait Islander children and young people in out-of-home care.

The literature review undertaken reflected the themes identified from the Commission’s engagement with Aboriginal and Torres Strait Islander children and young people and highlighted the importance of family contact, contact with community, participation in cultural events, strong cultural identity, knowledge of country, knowledge of language, knowledge of extended family relationships and knowledge of Indigenous codes of conduct.

Literature source (in chronological order)	Findings
Bringing Them Home Report - National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from Their Families, April 1997, Human Rights and Equal Opportunity Commission.	<p>Chapter 10 of the Bringing Them Home Report addresses the consequences of the forcible removal of Indigenous children through the perspectives of the Indigenous people who were removed as children. The accounts provided by the Indigenous people highlights the devastating consequences resulting from being removed and cut-off from their family, community and culture.</p> <p>Witnesses spoke of their loss of cultural identity and their feelings of not belonging either in the Indigenous community or in the non-Indigenous community:</p> <p><i>“You spend your whole life wondering where you fit. You're not white enough to be white and your skin isn't black enough to be black either, and it really does come down to that.”</i> (Confidential evidence 210, Victoria).</p> <p><i>“We weren't black or white. We were a very lonely, lost and sad displaced group of people. We were taught to think and act like a white person, but we didn't know how to think and act like an Aboriginal. We</i></p>

Literature source (in chronological order)	Findings
	<p><i>didn't know anything about our culture."</i> (Confidential submission 617, New South Wales: woman removed at 8 years with her 3 sisters in the 1940s; placed in Cootamundra Girls' Home).</p> <p><i>"I was very fortunate that when I was removed, I was with very loving and caring parents. The love was mutual ... My foster mother used to take me and my sister to town. Mum used to always walk through Victoria Square and say to us, 'Let's see if any of these are your uncles'. My sister and I used to get real shamed. I used to go home and cry because I used to get so frightened and could never understand why my mum would do this to us, when it made us upset. Only when I was near 29 did I realise why ... I know my foster parents were the type of people that always understood that I needed to know my roots, who I was, where I was born, who my parents were and my identity ... I remember one day I went home to my foster father and stated that I had heard that my natural father was a drunk. My foster father told me you shouldn't listen to other people: 'You judge him for yourself, taking into account the tragedy, that someday you will understand."</i> (Confidential submission 252, South Australia: woman fostered at 4 years in the 1960s).</p> <p>Witnesses spoke of how they were not able to speak their language and were unable to participate in cultural activities and events:</p> <p><i>"My mother and brother could speak our language and my father could speak his. I can't speak my language. Aboriginal people weren't allowed to speak their language while white people were around. They had to go out into the bush or talk their lingo on their own. Aboriginal customs like initiation were not allowed. We could not leave Cherbourg to go to Aboriginal traditional festivals. We could have a corroboree if the Protector issued a permit. It was completely up to him. I never had a chance to learn about my traditional and customary way of life when I was on the reserves."</i> (Confidential submission 110, Queensland: woman removed in the 1940s).</p> <p>Witnesses spoke of how there was little if any family contact:</p> <p><i>"If we got letters, you'd end up with usually 'the weather's fine', 'we love you' and 'from your loving mother' or whatever. We didn't hear or see what was written in between. And that was one way they kept</i></p>

Literature source (in chronological order)	Findings
	<p><i>us away from our families. They'd turn around and say to you, 'See, they don't care about you'. Later on, when I left the home, I asked my mother, 'How come you didn't write letters?' She said, 'But we did'. I said, 'Well, we never got them'."</i></p> <p>(Confidential evidence 450, New South Wales: woman removed at 2 years in the 1940s, first to Bomaderry Children's Home, then to Cootamundra Girls' Home; now working to assist former Cootamundra inmates).</p> <p>Additionally, chapter 10 also provides accounts on education, work and wages, and the safety and living conditions of placements.</p>
<p>Having Our Voices Heard, Aboriginal and Torres Strait Islander Youth Perspectives, National Indigenous Youth Leadership Group, 2004-05</p>	<p>The National Indigenous Youth Leadership Group 2004-05, comprised of 15 Aboriginal and Torres Strait Islander young people nationwide aged 18 to 24, provided their thoughts to the Australian Government on important issues affecting Indigenous children and young people in their community.</p> <p>In particular, the young people provided their views regarding what could improve cultural identity. A key theme from the responses was the importance of information and learning about culture, with one young person commenting that their dream for the future was for 'Strong culture and language to hand on to my kids.'</p>
<p>Achieving Stable and Culturally Strong Out of Home Care for Aboriginal and Torres Strait Islander Children, Secretariat of National Aboriginal and Islander Child Care, 2005.</p>	<p>In 2005, the Secretariat of National Aboriginal and Islander Child Care Incorporated (SNAICC) highlighted the importance of national standards being established for Aboriginal and Torres Strait Islander children in out-of-home care to reflect cultural and spiritual needs.</p> <p>Six principles were identified as a guide of necessary considerations in the development of national standards:</p> <ul style="list-style-type: none"> <li>• Safety is paramount.</li> <li>• Case planning for Aboriginal and Torres Strait Islander children should focus on the maintenance of connections to family and community and the development of cultural and spiritual identity (noting that Indigenous children in care 'must be given opportunities to have a relationship with family, including extended family members, and maintain their place in the interconnected network of people that forms their community').</li> <li>• Case planning for Aboriginal and Torres Strait Islander children should take a life course approach and focus on the needs of the child, both now and later as an older child, and adolescent and an adult.</li> </ul>

Literature source (in chronological order)	Findings
	<ul style="list-style-type: none"> <li>• Participation of children in decision making.</li> <li>• Plans for the child's cultural and spiritual development should be developed and the implementation of these plans must be adequately resourced (noting the importance of participation in community and cultural events).</li> <li>• Adequate caseworker, medical and educational support for all placements.</li> </ul>
<p>Enhancing out-of-home care for Aboriginal and Torres Strait Islander Young People, Australian Institute of Family Studies, October 2005.</p>	<p>Sixteen Aboriginal and Torres Strait Islander children and young people aged 7 to 16 from Queensland and Western Australia participated (in conjunction with a sample of carers and service providers) in a study aimed at enhancing recruitment, retention and support of Indigenous carers and enhancing the cultural connections for Indigenous children in out-of-home care.</p> <p>The young people were asked to present their views on aspects of Indigenous out-of-home care. Responses by young people demonstrated an almost exclusive focus on the importance of family, community and culture, with a strong theme of desired reconnection to family and community expressed. When asked 'If there was one thing in their lives that they could change, what would it be?' children commented 'To be with your family', 'Have family together' and 'We would really want to be with our parents.'</p> <p>The young people also highlighted positive elements of participating in cultural activities, with one young person commenting that 'Cultural activities reminds you of back home. It's cool to do those things.'</p> <p>Responses by carers and service providers were focused on the barriers and promising practices in recruiting and retaining Indigenous carers. One concern raised by carers was the difficulties experienced in managing contact with the child's family owing to the parent's reaction to the placement (as sometimes the families would know each other and this would potentially create hostility). However, in spite of the difficulties experienced, carers acknowledged the importance of maintaining contact with family where possible. Specifically mentioned was the need for contact with siblings where children are placed apart.</p>
<p>Defining Well-being for Indigenous Children in Care, Children Australia, Volume 32, Number 2, 2007.</p>	<p>A study was conducted to define indicators of wellbeing for Aboriginal and Torres Strait Islander children in care, to address the limited work that had been done in this area. The study sought the views of 20 Indigenous carers and child protection workers about what they thought was important for Aboriginal and Torres Strait Islander children in out-of-home care. This information was used to define social, spiritual and cultural wellbeing indicators for Aboriginal and Torres Strait Islander children in out-of-home care, in what the study described as the 'first</p>

Literature source (in chronological order)	Findings
	<p>attempt to define what Indigenous Australians themselves understand as wellbeing indicators for their children in care.' The following indicators were identified:</p> <ul style="list-style-type: none"> <li>• Social indicators- appropriate social skills and appropriate skills for independent living.</li> <li>• Spiritual indicators- participation in religious ceremonies and active acknowledgement of child's belief system.</li> <li>• Cultural indicators- knowledge of extended family relationships, knowledge of Indigenous codes of conduct, knowledge of country, participation in cultural ceremonies, and knowledge of language.</li> </ul> <p>The study identified that feedback should be sought from other Indigenous groups in defining the wellbeing of Indigenous children in care, to be considered in conjunction with findings from this study, and noted the significance of the indicators (in whatever final form they assumed) being operationalised so that outcomes can be evaluated against them.</p>
<p>VIYAC Voices Telling it Like it Is: Young Aboriginal Victorians on Culture, Identity and Racism, Victorian Indigenous Youth Advisory Council and Youth Affairs Council of Victoria.</p>	<p>The Victorian Indigenous Youth Advisory Council (VIYAC), comprised of Aboriginal and Torres Strait Islander young people aged 17 to 24, provided their perspectives on their culture, identity and racism. In particular, the young people provided their views on their connection to culture, how that occurs and how it can be strengthened.</p> <p>Key themes in the young people's responses about connection to culture were the importance of:</p> <ul style="list-style-type: none"> <li>• Learning about culture.</li> <li>• Participating in cultural activities and events – ie. storytelling, artwork, weaving, spearing, dancing, throwing the boomerang and playing the didgeridoo.</li> <li>• Family connection and contact – ie. 'being in and around my family', 'family ties' and 'listening and learning from my father, family and extended family.'</li> <li>• Connection and contact with community.</li> </ul>
<p>Foster their Culture, Caring for Aboriginal and Torres Strait Islander Children in Out-of-Home Care, Secretariat of National Aboriginal and Islander Child Care, 2008.</p>	<p>This report serves as a resource for non-Indigenous carers to assist them in better understanding how to support Indigenous children and young people in out-of-home care to grow up with a 'strong sense and knowledge of their cultural identity.'</p> <p>It highlights the importance of Indigenous children and young people having a clear sense of their cultural identity,</p>

Literature source (in chronological order)	Findings
	'knowing and having access to family and group identity' and having the opportunity to 'learn about and experience their culture.' It specifically acknowledges that placements for Aboriginal and Torres Strait Islander children that 'cut them off from their family, culture and spirituality are at great risk of psychological, health, development and educational disadvantage.
Overcoming Indigenous Disadvantage Key Indicators Report, Steering Committee for the Review of Government Service Provision, Commonwealth of Australia, 2009.	This report serves as a report card for the Council of Australian Governments (COAG) on progress made and areas for further improvement in closing the outcomes gap for Indigenous Australians against broad indicators of Indigenous disadvantage (ie. health, education, employment etc). However, it does discuss the importance of connection to traditional country (ie. recognition of country and access to country) and also contends that 'involvement in art and cultural activities may improve social cohesion and contribute to community wellbeing.'
Measuring the Social and Emotional Wellbeing of Aboriginal and Torres Strait Islander Peoples, Australian Institute of Health and Welfare, January 2009.	<p>This report discusses findings regarding the social and emotional wellbeing of Indigenous Australians (as sourced in the 2004/05 National Aboriginal and Torres Strait Islander Health Survey) against eight interim social and emotional wellbeing domains – psychological distress, impact of psychological distress, positive wellbeing, anger, life stressors, discrimination, cultural identification and removal from natural family.</p> <p>Of particular relevance:</p> <ul style="list-style-type: none"> <li>• The 'cultural identification' domain explores the attachment of Indigenous people (in non-remote areas) to their tribe, language group, clan and traditional country. Findings indicate that almost half of Indigenous adults who participated said they identified with a tribe, language group or clan, and 60% identified a specific area as their traditional country.</li> <li>• The 'removal from natural family' domain explores the extent of removal of Indigenous people from their natural families as an important element of social and emotional wellbeing.</li> </ul> <p>The report also assesses the utility of the interim domains as the next step in establishing an agreed model for evaluating the social and emotional wellbeing of Indigenous Australians. It identifies areas for improvement across the domains, however notes the importance of retention of both the 'cultural identification' and the 'removal from natural family' domain in measuring social and emotional wellbeing of Indigenous Australians.</p>
Key Directions for a Social, Emotional, Cultural and Spiritual Wellbeing Population Health Framework for	This report discusses social, emotional, cultural and spiritual wellbeing for Indigenous Australians, stating that 'protective factors derive from strong culture, family and community' and identifying the following as 'unique and culturally-specific risk and protective factors' for social, emotional, cultural and spiritual wellbeing:

Literature source (in chronological order)	Findings
Aboriginal and Torres Strait Islander Australians in Queensland, June 2009.	<ul style="list-style-type: none"> <li>• Kinship.</li> <li>• Family and community.</li> <li>• Spirituality.</li> <li>• Culture and cultural identity.</li> </ul>

## Appendix 4

### Links between recommendations made by the Commission in the inaugural *Indigenous Child Placement Principle Audit Report 2008* and the *Aboriginal and Torres Strait Islander Kinship Reconnection Project* report in 2010

Recommendations made in the Kinship Reconnection project	Alignment with Recommendations made in the inaugural Indigenous Child Placement Principle Audit Report 2008
<p>Summary of findings: The project provided opportunities for improving Aboriginal and Torres Strait Islander children's connections to family, community and culture and therefore has a broader application to other Regions.</p> <p>Recommendation 1: That the Kinship Reconnection project be implemented in other Regions and Child Safety Service Centres taking into account the factors identified as contributing to positive outcomes and those areas identified as requiring improvement.</p>	NA
<p>Summary of findings: Minor issues were identified with the survey tool – tool to be amended in accordance with identified areas for improvement.</p> <p>Recommendation 2: That the survey tool be reviewed and amended in line with the outcomes of this project.</p>	NA

Summary of findings:

The cultural background of 10 of the 26 children comprising the sample was unclear and/or in dispute. The process and basis for departmental officers identifying the cultural background of children appears unclear and should be clarified.

Recommendation 3:

That the process and basis for identifying the cultural background of children be clarified including:

- Procedures and practice guidance
- Involvement of Recognised Entities
- Management of disputes
- Documentation of efforts made.

**Inaugural recommendation 1** – The department develop guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in establishing a child's cultural identity, including the criteria for identifying an Aboriginal and/or Torres Strait Islander person.

**Inaugural recommendation 2** - The department develop guidelines for inclusion or in support of the Child Safety Practice Manual that assist and support departmental officers in:

- understanding the participation process with a recognised entity (including the local nature of relationship development), and
- giving the recognised entity an opportunity to participate in the placement decision-making process (in accordance with section 83(2) of the *Child Protection Act 1999*).

These guidelines should include (but not be limited to) details of how the recognised entity's expertise will:

- provide cultural information complying with the Child Placement Principle
- enhance the department's understanding of the child's family and community structures and relationships
- provide support by identifying placement options
- provide opinions about the suitability of placement options, and
- provide advice on how to:
  - retain relationships with Indigenous family and community
  - facilitate contact with Indigenous family and community, and
  - preserve and enhance the child's sense of Indigenous identity.

Summary of findings:

There were significant gaps in identifying and recording immediate and extended family members. Practice guidance is required to support departmental officers in the effective identification and recording of family and cultural information.

Recommendation 4:

That guidelines and support for identifying and recording family and cultural information be developed.

Inaugural recommendation 5 -

The department develop guidelines that explain:

- the types of relationships that exist in Aboriginal and Torres Strait Islander families and communities. Information about Torres Strait Islander child rearing practices or 'traditional adoptions' needs to be included, and
- the importance of departmental officers collecting and recording an Indigenous child's family and community structure to ensure appropriate and effective service delivery to Indigenous children.

Inaugural recommendation 6 –

The department develop comprehensive guidelines to support departmental officers in differentiating between family and community members for the purpose of section 83 of the *Child Protection Act 1999*.

Inaugural recommendation 7 –

The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in collecting information about family and community members before an Indigenous child's initial placement (if possible). These guidelines should also address the approach that departmental officers should take if the information required is not available.

Inaugural recommendation 8 –

The department enhance the ICMS person record to allow:

- the relationship tab to provide drop-down fields that are relevant to Indigenous family and community relationships, and
- the mandatory inclusion of the information currently captured in the cultural support plan section in the case plan form.

<p>Summary of findings: The current reform of Aboriginal and Torres Strait Islander child protection service delivery provides an opportunity to review roles and responsibilities for identifying immediate and extended family and community.</p> <p>Recommendation 5: Review the roles and responsibilities of Aboriginal and Torres Strait Islander child protection services and Child Safety Service Centres in identifying, recording, and reviewing relevant family and cultural information.</p>	NA
<p>Summary of findings: There was a lack of involvement of parents and extended family in family group meetings in cases where children are not being cared for in culturally appropriate placements. Family group meetings could be used to review case plans until culturally appropriate placements are achieved in accordance with the Indigenous Child Placement Principle.</p> <p>Recommendation 6: That Family Group Meetings be used to review the case plans of all children who are not being cared for in a culturally appropriate placement until such time that an appropriate placement has been found and the child has been placed.</p>	NA
<p>Summary of findings: Half of the children in the sample did not have a cultural support plan. Cultural support plans are particularly important for children who are not being cared for in culturally appropriate placements.</p> <p>Recommendation 7: That the development of Cultural Support Plans be prioritised of children who are not being cared for in culturally appropriate placements.</p>	NA
<p>Summary of findings: Departmental officers appeared to struggle to identify age appropriate cultural supports (evident</p>	NA

<p>in its absence from cultural support plans).</p> <p>Recommendation 8: That a list of age appropriate cultural supports be developed and provided to Child Safety Service Centres and be incorporated in each child's case plan including the resources section to ensure consideration of funding.</p>	
<p>Summary of findings: New strategies need to be established for developing cultural identity and maintaining connection to culture. In particular, two new strategies were recommended - mentors and local groups (age appropriate groups for Aboriginal and Torres Strait Islander children and young people run locally by Aboriginal and Torres Strait Islander people).</p> <p>Recommendation 9: That strategies for promoting cultural identity and connection for children in care, including the use of cultural mentors and local groups, be further explored.</p>	NA
<p>Summary of findings: Records did not adequately document what is required of carers to provide culturally appropriate care and whether or not this is being achieved.</p> <p>Recommendation 10: That Placement Agreements specify what actions are required of carers to provide cultural support to a child in line with the child's case plan and cultural support plan.</p>	<p>Links in with the concept of making non-Indigenous carers aware of what is expected of them in maintaining the child's connection to family, community and culture.</p> <p>Inaugural recommendation 23 – The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that assist and support departmental officers in assessing a non-Indigenous carer's commitment in accordance with the <i>Child Protection Act 1999</i>. The assessment process should include (but not be limited to):</p> <ul style="list-style-type: none"> <li>• the department identifying and recording what its expectation is of the non-Indigenous carer to: <ul style="list-style-type: none"> <li>– facilitate contact between the child and family members</li> <li>– help maintain contact with the child's community or language group</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>– help maintain a connection with the child’s Aboriginal or Torres Strait Islander culture, and</li> <li>– preserve and enhance the child’s sense of Aboriginal or Torres Strait Islander identity</li> <li>• the department providing details of its expectations to the non-Indigenous carer</li> <li>• the non-Indigenous carer’s response to the department’s expectations (including any support that may need to be provided by the department to the non-Indigenous carer), and</li> <li>• a written commitment from the non-Indigenous carer to meet the department’s expectations.</li> </ul>
<p>Summary of findings: As above.</p> <p>Recommendation 11: That information resource materials be developed for carers about cultural identity, connection and learning, and their role as carers.</p>	<p>As above.</p>
<p>Summary of findings: There was no clear documentation of the steps taken to identify culturally appropriate placements for the children in the sample in line with the Indigenous Child Placement Principle, nor was there adequate records of the outcomes of these steps.</p> <p>Recommendation 12: That steps taken to identify a culturally appropriate placement in line with the Child Placement Principle are clearly documented in the case plan.</p>	<p>Links in with all recommendations targeted at improving record keeping in the ICMS in regards to compliance with section 83 of the <i>Child Protection Act 1999</i> (inaugural recommendations 4, 8, 10, 12, 13, 15, 17, 19, 21, 24)</p>
<p>Summary of findings: Practice considerations for each of the placement options in section 83 of the <i>Child Protection Act 1999</i> should be clearly identified to support departmental officers and Recognised Entities in decision making. This could be supported by a reporting template to record consideration of</p>	<p>Links in with recommendations targeted at improving policies and guidance provided to departmental officers relevant to placement options prescribed in section 83 of the <i>Child Protection Act 1999</i> (inaugural recommendations 5, 6, 7, 9, 11, 14, 16)</p>

<p>each step.</p> <p>Recommendation 13. That practice considerations for each of the placement options in the Child Placement Principle be identified to support Child Safety Service Centre and Recognised Entities in decision making.</p>	
<p>Summary of findings: Recognised Entity involvement was not always clear from the records.</p> <p>Recommendation 14: That the recording of Recognised Entity involvement in placement decisions be reviewed and amended including consideration of:</p> <ul style="list-style-type: none"> <li>• tagging the Recognised Entity pop-up to the creation of the location specific to each carer for the child</li> <li>• confirming Recognised Entity participation by email sent to the Child Safety Officer, who should enter the email into case notes and refer to it in the Recognised Entity participation form.</li> <li>•</li> </ul>	<p>NA. The <i>Indigenous Child Placement Principle Audit Report 2008</i> found that the main gap in record keeping about RE involvement was whether the placement decision had been made in urgent circumstances (and made inaugural recommendation 4 accordingly).</p>
<p>Summary of findings: The placement of children with non-Indigenous carers has implications for maintaining connection to family, community and culture. The impact is exacerbated the longer the placement continues and is compounded by factors such as attachment to the carer.</p> <p>Recommendation 15: That the purpose of interim placements with non-Indigenous carers or other non-Indigenous placements is made explicit in the Placement Agreement and clearly communicated to all stakeholders.</p>	<p>NA</p>
<p>Recommendation 16: That the steps to be taken to locate and assess extended family members or locate another culturally appropriate placement are clearly identified and subject to three monthly reviews.</p>	<p>NA</p>

<p>Recommendation 17: That practice guidance on emotional and cultural attachment be developed and disseminated.</p>	<p>NA</p>
<p>Summary of findings: There were significant gaps in information about family contact and reasons inhibiting contact. The gaps included information not being recorded, contact not having been explored, and family members not being known to Child Safety.</p> <p>Recommendation 18: That the case plan clearly identify:</p> <ul style="list-style-type: none"> <li>• parents, siblings and extended family</li> <li>• strategies for maintaining or establishing contact with parents, siblings and extended family</li> <li>• arrangements for contact including necessary supports.</li> </ul>	<p>Inaugural recommendation 20 – The department develop comprehensive guidelines for inclusion in the Child Safety Practice Manual that will assist and support departmental officers in assessing the placement option’s ability to retain the child’s relationships with parents, siblings and people of significance. The following questions should be addressed by the guidelines:</p> <ul style="list-style-type: none"> <li>• Will the placement option provide a supportive environment that allows the retention of the child’s relationships with parents, siblings and people of significance?</li> <li>• Will the placement option enable contact with parents, siblings and people of significance?</li> <li>• Are there any factors that would prevent/hinder the child’s relationships with parents, siblings and people of significance?</li> </ul> <p>Inaugural recommendation 21 – The department enhance the ICMS recognised entity/Child Placement Principle form to allow recording of consideration given to a placement option’s ability to retain the child’s relationships with parents, siblings and people of significance.</p>
<p>Summary of findings: There is need to clarify the roles and responsibilities of Recognised Entities, Family Support Services and Foster Care and Kinship Care Services in identifying and confirming cultural background, identifying family and community and providing advice about relationships between family members and community members to Child Safety.</p> <p>Recommendation 19: That the Recognised Entities have primary responsibility for coordinating the collection of information and provision of advice to Child Safety Service Centres in relation to identifying and</p>	<p><b>Inaugural recommendation 2</b> - The department develop guidelines for inclusion or in support of the Child Safety Practice Manual that assist and support departmental officers in:</p> <ul style="list-style-type: none"> <li>• understanding the participation process with a recognised entity (including the local nature of relationship development), and</li> <li>• giving the recognised entity an opportunity to participate in the placement decision-making process (in accordance with section 83(2) of the <i>Child Protection Act 1999</i>).</li> </ul> <p>These guidelines should include (but not be limited to) details of how</p>

<p>confirming cultural background, identifying family and community and providing advice about relationships between family members and community members.</p>	<p>the recognised entity's expertise will:</p> <ul style="list-style-type: none"> <li>• provide cultural information complying with the Child Placement Principle</li> <li>• enhance the department's understanding of the child's family and community structures and relationships</li> <li>• provide support by identifying placement options</li> <li>• provide opinions about the suitability of placement options, and</li> <li>• provide advice on how to: <ul style="list-style-type: none"> <li>– retain relationships with Indigenous family and community</li> <li>– facilitate contact with Indigenous family and community, and</li> <li>– preserve and enhance the child's sense of Indigenous identity.</li> </ul> </li> </ul>
<p>Summary of findings: The potential of specified Child Safety Support Officers to contribute to culturally appropriate support and care for children and families was not being realised.</p> <p>Recommendation 20: That the role of specified Child Safety Support Officers be reviewed and their contribution to culturally appropriate support and care being provided to children and families be promoted.</p>	<p>No direct relationship with inaugural recommendations but aligns conceptually with the notion that having specialised officers will assist in ensuring maintained connection to family, community and culture.</p> <p>Inaugural recommendation 27- The department consider the introduction of specialised positions that case manage only Indigenous children. These positions could allow effective engagement with the recognised entity and local community members. Expertise in applying the Child Placement Principle would also be developed by departmental officers.</p>
<p>Summary of findings: Significant case management issues were identified in relation to all children included in the sample.</p> <p>Recommendation 21: That the training of departmental staff be reviewed and updated to develop their cultural capability.</p>	<p>Inaugural recommendation 26 – The department develop training for departmental officers about the application of section 83 of the <i>Child Protection Act 1999</i>. This training should be rolled out once all procedural recommendations of this report have been implemented.</p>
<p>Recommendation 22: That the Child Safety Practice Manual be reviewed and updated to provide additional guidance for staff, at all points of the child protection process, in culturally responsive practice.</p>	<p>Links in with all recommendations targeted at improving guidance provided to departmental officers (inaugural recommendations 1, 2, 3, 5, 6, 7, 9, 11, 14, 16, 18, 20, 22, 23, 25).</p>

<p>Recommendation 23:</p> <p>That the roles and responsibilities of the Department of Community Services (Child Safety Services) and Aboriginal and Torres Strait Islander child protection services in relation to case management be reviewed in the broader context of the Aboriginal and Torres Strait Islander Child Safety Taskforce and the development and implementation of a comprehensive plan for reducing over-representation in the child protection system.</p>	<p>NA</p>
<p>Summary of findings:</p> <p>The existing service system has limited capacity to identify, assess and support family members who are willing to provide kinship care. Neither Child Safety Service Centres or Aboriginal and Torres Strait Islander child protection services are resourced to undertake this work.</p> <p>Recommendation 24:</p> <p>That the role of the Aboriginal and Torres Strait Islander Foster and Kinship Care services be reviewed and consideration be given to focusing their resources on finding, assessing and supporting kinship carers.</p>	<p>NA</p>
<p>Summary of findings:</p> <p>There are currently only nine funded Aboriginal and Torres Strait Islander Foster and Kinship Care services across Queensland.</p> <p>Recommendation 25:</p> <p>That the level of need for kinship care and resources required to meet that need be identified.</p>	<p>NA</p>
<p>Summary of findings:</p> <p>Kinship care is more akin to 'in-family care' than to foster care – therefore a Kinship Care program would need to be developed.</p> <p>Recommendation 26:</p> <p>That an Aboriginal and Torres Strait Islander Kinship Care Program be developed with reference to:</p>	<p>NA</p>

<ul style="list-style-type: none"> <li>• finding kin</li> <li>• assessing and approving kin (including the use of provisional approval and obtaining the required 'suitability clearances')</li> <li>• planning placements with kin including resource requirements</li> <li>• supporting and training kin in relation to the demands and requirements of their role</li> <li>• providing casework support to children placed with kin</li> <li>• linking placement planning with case planning and the allocation of resources required to support culturally appropriate care and achieving the desired outcomes identified for the child and their family.</li> </ul>	
<p>Summary of findings:</p> <p>The time it takes to find kinship carers and the lack of availability of other culturally appropriate options contributes to the placement of Aboriginal and Torres Strait Islander children with non-Indigenous carers and their disconnection from family, community and culture.</p> <p>Recommendation 27:</p> <p>That culturally appropriate short term placement and support options be developed and funded for Aboriginal and Torres Strait Islander children.</p>	NA
<p>Summary of findings:</p> <p>If family or community members cannot be found for children, other culturally appropriate placement and support services to which children can transition from short term placement and support options to longer term care and support will need to be available.</p> <p>Recommendation 28:</p> <p>That other strategies to increase the availability of culturally appropriate placement and support options for Aboriginal and Torres Strait Islander children be established and funded.</p>	NA

# Appendix 5

## Counting rules for assessing compliance using the three sources of data that informed the audit

### Step 1 – Identify the child is Indigenous (s83(1))

Yes	Child is Aboriginal, Torres Strait Islander or both.
No	Child is not Aboriginal, Torres Strait Islander or both.
NVR	No valid survey response.
NA	<ul style="list-style-type: none"> <li>• NA<sup>3</sup> - RE did not have records or knowledge about the placement decision that would allow them to complete the survey.</li> <li>• NA<sup>4</sup> - RE was not involved in the placement decision or was not consulted after the placement was made in urgent circumstances.</li> <li>• NA<sup>6</sup> - RE did not participate in the placement decision once provided the opportunity (or it was unknown).</li> </ul>

### Step 2 – Involvement of a Recognised Entity (RE) – (s83(2) and (3))

Yes	RE was provided the opportunity to participate in the placement decision or was consulted after the placement was made in urgent circumstances.
No	RE was not provided the opportunity to participate in the placement decision or was not consulted after the placement was made in urgent circumstances.
NVR	No valid survey response.
NA	<ul style="list-style-type: none"> <li>• NA<sup>1</sup> - Child is not Indigenous.</li> <li>• NA<sup>2</sup> - No known RE to consult with.</li> <li>• NA<sup>4</sup> - RE was not involved in the placement decision or was not consulted after the placement was made in urgent circumstances. (This category would normally be a 'no' for this section, however 'NA' was assigned in some cases where the RE responded that it was unknown if their RE service had been provided the opportunity to participate to prevent a false assessment).</li> <li>• NA<sup>11</sup> - RE participation not supported by family.</li> </ul>
NFP	No ICMS form provided (ie. no valid response).
NI	ICMS form provided but no information contained (ie. no valid response).

### Step 3 – Hierarchy of placement options – (s83(4) and (6))

Yes	Evidence that each level of the hierarchy was considered until the placement was made.
No	Lack of evidence to determine compliance.
NVR	No valid survey response.
NA	<ul style="list-style-type: none"> <li>• NA<sup>1</sup> - Child is not Indigenous.</li> <li>• NA<sup>3</sup> - RE does not have records or information to allow them to complete the survey.</li> <li>• NA<sup>4</sup> - RE was not known to be given the opportunity to participate in the placement decision before the placement was made, nor consulted after the placement was made in urgent circumstances.</li> <li>• NA<sup>5</sup> - RE was consulted after the placement decision, therefore the RE was not involved in the decision making process itself.</li> <li>• NA<sup>6</sup> - Unknown if RE participated in the placement decision once provided the opportunity.</li> <li>• NA<sup>7</sup> - This relates to information captured in ICMS – it means that an assessment could not occur as there was only a record of the outcome of the decision making process.</li> </ul>

### Step 4 – Part A – Proper consideration of REs views – (s83(5))

Yes	Evidence that there was proper consideration of the REs views. This means that there was agreement between the RE and the CSO, or where there was not agreement there was evidence that the CSO had discussed the placement with the RE and identified/considered their views.
No	<ul style="list-style-type: none"> <li>• No evidence that the CSO gave consideration to the REs views</li> <li>• Urgent circumstances could not be established as a reason for failure to provide the RE the opportunity to participate in the placement decision, therefore proper consideration of the REs views cannot be determined to have occurred as intended by section 83.</li> </ul>
NA	<ul style="list-style-type: none"> <li>• NA<sup>1</sup> - Child is not Indigenous.</li> <li>• NA<sup>2</sup> - No known RE to consult with.</li> <li>• NA<sup>3</sup> - RE does not have records or information to allow them to complete the survey.</li> <li>• NA<sup>4</sup> - RE was not involved in the placement decision or consulted after the placement was made in urgent circumstances.</li> <li>• NA<sup>6</sup> - Unknown if RE participated once they were given the opportunity.</li> <li>• NA<sup>10</sup> - The participant inaccurately entered an earlier response therefore the necessary information was not subsequently captured by the survey workflow.</li> <li>• NA<sup>11</sup> - RE participation not supported by family.</li> <li>• NA<sup>12</sup> - Evidence that the RE was initially consulted about the suitability of the respite placement to occur on an ongoing basis, therefore there was no record of the RE's views provided in the immediate instance.</li> </ul>
NVR	No valid survey response.
NFP	No ICMS form provided (ie. no valid response).

NI	ICMS form provided but no information contained (ie. no valid response).
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#### Step 4 – Part B – Retention of relationships – (s83(5))

Yes	Consideration of ALL relevant relationships (ie. if a key person is deceased or the child does not have any siblings etc they are deemed not relevant for consideration).
No	<ul style="list-style-type: none"> <li>• Partial consideration of relevant relationships.</li> <li>• No evidence of consideration of any relevant relationships.</li> <li>• It is unknown to the CSO where the child was placed therefore this question could not be validly answered.</li> </ul>
NA	<ul style="list-style-type: none"> <li>• NA<sup>1</sup> - Child is not Indigenous.</li> <li>• NA<sup>3</sup> - RE does not have records or information to allow them to complete the survey.</li> <li>• NA<sup>4</sup> - RE was not involved in the placement decision or was not consulted after the placement was made in urgent circumstances. (This category would normally be a 'no' for this section, however NA was assigned in some cases where the RE responded that it was unknown if their RE service had been provided the opportunity to participate to prevent a false assessment).</li> <li>• NA<sup>5</sup> - RE was consulted after the placement decision, therefore the RE was not involved in the decision making process itself.</li> <li>• NA<sup>6</sup> - Unknown if RE participated in the placement decision once provided the opportunity.</li> <li>• NA<sup>7</sup> - This relates to ICMS – it means that there was incomplete information to adequately assess whether retention of the child's relationships was considered. The inaugural recommendations have not yet been implemented, therefore the forms do not contain specific fields that ask the CSO to identify and provide details of the child's relationship with key people in their lives, provide an assessment of whether the placement will ensure optimal retention of the relationship and provide details of how it will do this. Currently, the Case Plan and the Placement Agreement contain general information about contact arrangements with key people. Based on the information provided, the Commission has insufficient evidence to determine whether proper consideration has been given to ALL key people, which was established as the threshold for compliance for assessing the CSO and RE surveys. For example, it is possible that the Case Plan or Placement Agreement might contain some information about contact arrangements with the child's mother, however it is not possible to determine whether this is the only family member or person of significance that needs to be considered when making an assessment about the retention of the child's relationships. It is possible that the child may have a father, siblings, extended family or community members that are absent from consideration. The inverse is also true. It is not possible to determine that there is non-compliance (ie failure to consider the retention of all relationships with all key people) based on the absence of information. For this reason, the assessment of compliance will be based on CSO and RE survey responses where participants have been asked specific questions about the retention of relationships based on their knowledge and records as relevant to the placement decision.</li> </ul>
NVR	No valid survey response.

### Step 5 – Assessment of non-Indigenous carer commitment – s83(7))

Yes	Consideration of ALL elements of non-Indigenous carer commitment. This means that there was evidence of an assessment of commitment, regardless of whether the non-Indigenous carer was or was not committed.
No	<ul style="list-style-type: none"> <li>• Partial consideration of elements of non-Indigenous carer commitment</li> <li>• No evidence of consideration of non-Indigenous carer commitment</li> <li>• It is unknown to the CSO where the child was placed therefore this question could not be validly answered.</li> </ul>
NA	<ul style="list-style-type: none"> <li>• NA<sup>1</sup> - Child is not Indigenous.</li> <li>• NA<sup>3</sup> - RE did not have records or knowledge about the placement decision that would allow them to complete the survey.</li> <li>• NA<sup>4</sup> - RE was not involved in the placement decision or consulted after the placement was made in urgent circumstances.</li> <li>• NA<sup>5</sup> - RE was consulted after the placement decision, therefore the RE was not involved in the decision making process itself.</li> <li>• NA<sup>6</sup> - Unknown if RE participated in the placement decision once provided the opportunity.</li> <li>• NA<sup>8</sup> - It is unknown to the RE where the child was placed therefore this question could not be validly answered.</li> <li>• NA<sup>9</sup> - Child was not placed with a non-Indigenous carer.</li> </ul>
NVR	No valid survey response.
NFP	No ICMS form provided (ie. no valid response).
NI	ICMS form provided but no information contained (ie. no valid response).

### Summary of NA breakdown for compliance table

NA <sup>1</sup>	Child is not Indigenous.
NA <sup>2</sup>	No known RE to consult with.
NA <sup>3</sup>	RE did not have records or knowledge about the placement decision that would allow them to complete the survey.
NA <sup>4</sup>	RE was not involved in the placement decision or was not consulted after the placement had been made in urgent circumstances.
NA <sup>5</sup>	RE was consulted after the placement decision, therefore the RE was not involved in the placement decision itself.
NA <sup>6</sup>	RE did not participate in the placement decision once provided the opportunity (or it was unknown if they participated).
NA <sup>7</sup>	There was insufficient evidence to adequately assess.

NA <sup>8</sup>	The RE did not know where the child was placed therefore could not validly respond.
NA <sup>9</sup>	Child was not placed with a non-Indigenous carer.
NA <sup>10</sup>	The participant inaccurately entered an earlier response therefore the necessary information was not subsequently captured by the survey workflow.
NA <sup>11</sup>	RE participation not supported by family.
NA <sup>12</sup>	Evidence that the RE was initially consulted about the suitability of the respite placement to occur on an ongoing basis, therefore there was no record of the REs views provided in the immediate instance.

## Appendix 6

### Counting rules for assessing overall compliance with each step of the Compliance Assessment Tool

This document outlines the counting rules that were used to assess overall compliance with each step of the Compliance Assessment Tool when reconciling the three unique assessments that were made from each of the three data sources used to inform the audit (CSO surveys, RE surveys and ICMS forms).

Yes, evidence of compliance	<ul style="list-style-type: none"> <li>• All yes responses.</li> <li>• One or more yes responses accompanied only by a No Valid Response (NVR) or No Form Provided (NFP) (assessment based on valid information available ie. no evidence to discredit).</li> <li>• Where the RE response is a yes and one of the Department of Communities' information sources (CSO survey or ICMS) is a yes.</li> <li>• Where there is a discrepancy between the Department of Communities information sources (ICMS record and/or CSO survey) and the RE survey and at least one information source indicates compliance (benefit of the doubt based on Advisory Committee's advice).</li> <li>• Where there is only the Department of Communities' information sources available (ICMS record and the CSO survey) and there is a discrepancy, however ICMS indicates a yes response (ICMS record used as point of truth based on the Department of Communities' advice).</li> </ul>
No evidence of compliance	<ul style="list-style-type: none"> <li>• All no responses.</li> <li>• One or more no responses accompanied only by a NVR or NFP (assessment based on valid information available ie. no evidence to discredit).</li> </ul>
No valid response (NVR)	<ul style="list-style-type: none"> <li>• Where there is insufficient evidence to make an assessment of compliance.</li> </ul>
Not applicable (NA)	<ul style="list-style-type: none"> <li>• Not applicable for one of the reasons noted in Appendix 5.</li> </ul>

# Appendix 7

## Assessment of compliance across the five steps of the Compliance Assessment Tool by information source

Assessments with an \* represent the placement decisions where there was a discrepancy between the Department of Communities' data sources and the Recognised Entities survey response. However, compliance was assessed to have occurred where at least one source evidenced compliance.

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>5</sup>	Yes	Yes	No
2	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
3	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NA <sup>2</sup>	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
4	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
5	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
6	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
7	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	No	Yes	NVR	Yes*	No	NA <sup>5</sup>	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>5</sup>	NVR	NA <sup>9</sup>	No
8	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>6</sup>	NA <sup>6</sup>	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
9	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
10	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
11	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
12	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	No	NVR	Yes*	Yes
13	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
14	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
15	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
16	No	NVR	Yes	Yes	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NA <sup>7</sup>	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NA <sup>7</sup>	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NVR
17	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
18	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
19	NVR	NA <sup>4</sup>	Yes	Yes	NVR	No	NVR	No	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	No	NVR	No	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>4</sup>	NVR	NVR	No
20	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	NVR	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	NVR	Yes	Yes
21	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
22	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
23	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
24	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>5</sup>	NVR	Yes	No
25	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>5</sup>	NA <sup>7</sup>	NVR	NVR	Yes	Yes	Yes	NVR	NA <sup>5</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>5</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NVR
26	NVR	NVR	Yes	Yes	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	No
27	Yes	NA <sup>6</sup>	Yes	Yes	No	Yes	NVR	Yes*	No	NA <sup>6</sup>	NA <sup>7</sup>	No	No	NA <sup>6</sup>	NVR	No	No	NA <sup>6</sup>	NA <sup>7</sup>	No	No	NA <sup>6</sup>	NVR	No	No
28	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
29	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	No	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	Yes	NVR	Yes*	No
30	Yes	Yes	Yes	Yes	No	Yes	NVR	Yes*	No	No	NA <sup>7</sup>	No	No	Yes	NVR	Yes*	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	No
31	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
32	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
33	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
34	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
35	No	Yes	Yes	Yes	NA <sup>1</sup>	Yes	Yes	Yes	NA <sup>1</sup>	No	NA <sup>7</sup>	No*	NA <sup>1</sup>	Yes	Yes	Yes	NA <sup>1</sup>	No	NA <sup>7</sup>	No*	NA <sup>1</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
36	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes
37	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>5</sup>	NA <sup>7</sup>	NVR	NVR	No	Yes	Yes*	NVR	NA <sup>5</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>5</sup>	Yes	Yes	NVR
38	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	NVR	Yes*	No
39	Yes	NA <sup>3</sup>	Yes	Yes	Yes	Yes	NVR	Yes	No	NA <sup>3</sup>	NA <sup>7</sup>	No	Yes	NA <sup>3</sup>	NVR	Yes	Yes	NA <sup>3</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>3</sup>	NVR	Yes	No
40	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>12</sup>	NVR	NVR	NA <sup>12</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
41	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
42	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
43	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
44	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
45	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
46	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
47	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
48	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
49	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
50	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
51	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
52	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
53	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
54	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
55	Yes	NVR	Yes	Yes	Yes	NVR	No	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	No	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
56	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	Yes	Yes	Yes
57	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
58	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	NA <sup>5</sup>	Yes	Yes	No
59	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes
60	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
61	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
62	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
63	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
64	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
65	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
66	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	Yes	Yes*	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>4</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
67	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
68	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>6</sup>	NA <sup>6</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
69	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
70	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
71	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
72	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>2</sup>	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	No	Yes	Yes	Yes	No
73	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
74	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	Yes	Yes	No
75	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
76	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
77	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
78	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
79	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
80	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
81	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
82	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
83	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
84	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
85	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
86	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
87	Yes	No	Yes	Yes*	Yes	Yes	Yes	Yes	Yes	NA <sup>1</sup>	NA <sup>7</sup>	Yes*	Yes	NA <sup>1</sup>	Yes	Yes*	Yes	NA <sup>1</sup>	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>1</sup>	NA <sup>9</sup>	NA <sup>9*</sup>	Yes
88	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
89	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
90	Yes	Yes	Yes	Yes	No	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	NVR	Yes*	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	No
91	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
92	NVR	NVR	Yes	Yes	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	No
93	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	No	NA <sup>5</sup>	NA <sup>7</sup>	No	NA <sup>2</sup>	Yes	NVR	Yes*	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>5</sup>	NVR	NA <sup>9</sup>	No
94	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
95	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
96	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	Yes	Yes	No
97	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
98	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NA <sup>6</sup>	NA <sup>6</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
99	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
100	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	No	Yes	Yes*	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
101	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
102	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
103	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
104	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	Yes	Yes	NA <sup>7</sup>	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	No
105	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
106	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
107	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
108	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
109	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
110	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
111	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
112	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
113	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
114	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
115	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
116	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	NVR	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NVR	No*	No
117	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
118	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>5</sup>	NVR	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
119	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
120	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
121	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>12</sup>	NVR	NVR	NA <sup>12</sup>	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
122	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
123	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
124	Yes	Yes	Yes	Yes	No	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	NVR	Yes*	Yes	Yes	NA <sup>7</sup>	Yes	No	NA <sup>9</sup>	NVR	No	No
125	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
126	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
127	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
128	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
129	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
130	NVR	NA <sup>4</sup>	Yes	Yes	NVR	No	NVR	No	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	No	NVR	No	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>4</sup>	NVR	NVR	No
131	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
132	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
133	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	Yes	Yes	No
134	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
135	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>5</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
136	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	NVR	Yes	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
137	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
138	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
139	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	No	Yes	Yes*	No
140	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
141	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
142	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
143	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
144	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
145	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
146	Yes	NA <sup>4</sup>	Yes	Yes	No	No	Yes	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	No	No	Yes	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	No	NA <sup>4</sup>	Yes	Yes	No
147	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
148	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
149	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
150	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
151	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
152	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
153	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
154	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
155	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
156	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes
157	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
158	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
159	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
160	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
161	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
162	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
163	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
164	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
165	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes
166	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
167	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
168	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
169	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>6</sup>	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
170	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
171	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
172	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
173	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
174	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
175	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
176	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
177	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
178	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
179	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
180	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
181	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
182	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
183	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
184	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
185	NVR	NA <sup>3</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>3</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>3</sup>	Yes	Yes	NVR	NA <sup>3</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>3</sup>	Yes	Yes	NVR
186	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
187	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	Yes	Yes	No
188	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
189	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
190	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
191	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
192	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
193	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
194	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
195	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	NA <sup>5</sup>	Yes	Yes	No
196	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
197	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
198	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
199	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	Yes	Yes	No
200	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
201	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>6</sup>	NA <sup>6</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
202	NVR	NVR	Yes	Yes	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
203	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
204	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
205	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
206	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
207	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
208	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>4</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
209	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	Yes	Yes	Yes	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	No	NA <sup>5</sup>	Yes	Yes	No
210	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
211	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
212	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	NA <sup>8</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>8</sup>	Yes	Yes	No
213	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	Yes	NA <sup>9</sup>	No
214	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
215	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
216	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
217	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
218	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
219	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	Yes	Yes	No
220	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
221	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
222	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
223	Yes	Yes	Yes	Yes	No	Yes	NVR	Yes*	No	NA <sup>5</sup>	NA <sup>7</sup>	No	No	No	NVR	No	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	No	NA <sup>5</sup>	NVR	No	No
224	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
225	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
226	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary	
227	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No	
228	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	
229	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No	
230	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR
231	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>6</sup>	NA <sup>6</sup>	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR
232	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	
233	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	Yes	Yes	No	NA <sup>4</sup>	NA <sup>7</sup>	No	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>4</sup>	Yes	Yes	No	
234	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>12</sup>	NVR	NVR	NA <sup>12</sup>	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No	
235	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No	
236	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No	
237	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR
238	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR
239	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	No	NA <sup>7</sup>	No	NVR	Yes	NVR	Yes	NVR	No	NA <sup>7</sup>	No	NVR	Yes	NVR	Yes	No	
240	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	No	NA <sup>7</sup>	No	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	NVR	Yes	No	
241	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No	
242	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	
243	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	
244	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
245	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
246	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
247	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	No	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	No	Yes	Yes*	No
248	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
249	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	Yes	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	No	Yes	Yes*	Yes
250	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
251	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
252	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
253	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
254	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
255	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
256	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
257	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
258	Yes	NA <sup>4</sup>	Yes	Yes	No	No	NVR	No	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	No	NVR	No	No	NA <sup>4</sup>	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>4</sup>	NVR	NA <sup>9</sup>	No
259	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
260	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
261	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
262	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
263	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
264	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
265	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
266	Yes	NA <sup>4</sup>	Yes	Yes	Yes	NA <sup>4</sup>	NVR	Yes	No	NA <sup>4</sup>	NA <sup>7</sup>	No	Yes	NA <sup>4</sup>	NVR	Yes	Yes	NA <sup>4</sup>	NA <sup>7</sup>	Yes	No	NA <sup>4</sup>	NVR	No	No
267	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
268	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
269	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	Yes	Yes	No
270	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	Yes	Yes	No
271	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
272	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
273	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	No	NA <sup>7</sup>	No	NVR	Yes	Yes	Yes	NVR	NA <sup>8</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>8</sup>	Yes	Yes	No
274	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
275	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	Yes	Yes	No
276	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
277	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
278	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
279	NVR	NVR	Yes	Yes	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	No
280	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
281	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
282	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	No	Yes	Yes*	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	No
283	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
284	Yes	Yes	Yes	Yes	No	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes
285	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
286	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
287	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	Yes	Yes	No
288	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	Yes	NA <sup>9</sup>	Yes
289	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
290	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
291	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
292	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes
293	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
294	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	NA <sup>9</sup>	Yes	Yes*	No
295	NVR	NA <sup>4</sup>	Yes	Yes	NVR	NA <sup>4</sup>	NVR	NVR	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>4</sup>	NVR	NVR	NVR	NA <sup>4</sup>	NA <sup>7</sup>	NVR	NVR	NA <sup>4</sup>	NVR	NVR	NVR
296	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
297	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
298	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>2</sup>	Yes	NA <sup>6</sup>	Yes*	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
299	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	No	Yes	Yes	Yes	Yes
300	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
301	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
302	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
303	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>6</sup>	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	Yes
304	Yes	NA <sup>3</sup>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>3</sup>	NA <sup>7</sup>	Yes	No	NA <sup>3</sup>	Yes	Yes	Yes	NA <sup>3</sup>	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>3</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
305	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	Yes	NVR	Yes*	Yes
306	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
307	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	No	NA <sup>7</sup>	No	NVR	Yes	Yes	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	NA <sup>9</sup>	Yes	Yes*	No
308	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
309	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
310	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
311	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
312	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
313	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
314	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
315	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
316	Yes	NVR	Yes	Yes	Yes	NVR	No	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	No	No	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
317	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	No	No	NA <sup>7</sup>	No	NA <sup>2</sup>	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	No	NA <sup>9</sup>	NVR	No*	No
318	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
319	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
320	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
321	Yes	NVR	Yes	Yes	NA <sup>11</sup>	NVR	NVR	NA <sup>11</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>11</sup>	NVR	NVR	NA <sup>11</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
322	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	No	Yes	NVR	Yes*	No	No	NA <sup>7</sup>	No	No	No	NVR	No	No
323	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR
324	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>12</sup>	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes
325	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NA <sup>2</sup>	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
326	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	Yes	Yes	NA <sup>7</sup>	Yes	NA <sup>2</sup>	Yes	NVR	Yes*	No	Yes	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes
327	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
328	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
329	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
330	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
331	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	No
332	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
333	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	Yes	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
334	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
335	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	NVR	Yes	Yes	NA <sup>8</sup>	NA <sup>7</sup>	Yes	Yes	NA <sup>8</sup>	NVR	Yes	Yes
336	Yes	Yes	Yes	Yes	NA <sup>2</sup>	Yes	No	Yes*	No	NA <sup>5</sup>	NA <sup>7</sup>	No	NA <sup>2</sup>	Yes	No	Yes*	Yes	NA <sup>5</sup>	NA <sup>7</sup>	Yes	No	NA <sup>5</sup>	Yes	Yes	No
337	NVR	NVR	Yes	Yes	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	No	No	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	No
338	No	NVR	Yes	Yes	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NA <sup>7</sup>	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NA <sup>7</sup>	NA <sup>1</sup>	NA <sup>1</sup>	NVR	NVR	NA <sup>1</sup>	NVR
339	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	No	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	No	Yes	Yes*	No
340	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes
341	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No
342	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
343	Yes	NVR	Yes	Yes	Yes	NVR	No	No	No	NVR	NA <sup>7</sup>	No	No	NVR	No	No	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No
344	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
345	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
346	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	Yes	NA <sup>7</sup>	Yes*	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	No	NA <sup>9</sup>	NVR	No*	No
347	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
348	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
349	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
350	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
351	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
352	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No

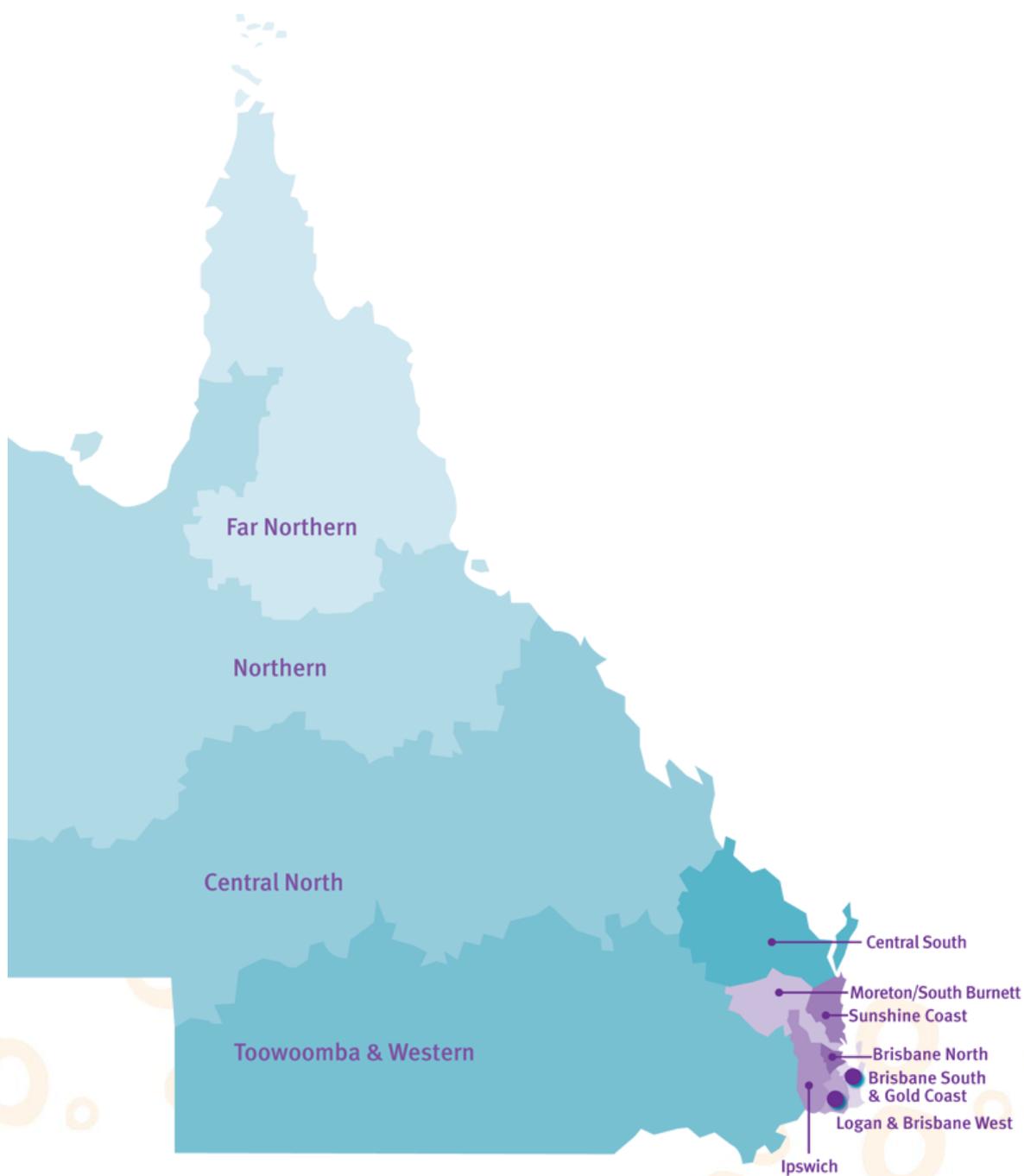
ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
353	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
354	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	No	NVR	No	No
355	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NA <sup>9</sup>	NA <sup>9</sup>	NVR
356	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
357	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
358	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
359	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
360	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	No
361	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
362	Yes	NVR	Yes	Yes	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
363	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
364	Yes	NVR	Yes	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
365	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	No
366	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	No
367	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
368	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	NA <sup>7</sup>	Yes*	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	No
369	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
370	Yes	Yes	Yes	Yes	Yes	Yes	NVR	Yes	No	No	NA <sup>7</sup>	No	NA <sup>6</sup>	Yes	NVR	Yes*	Yes	No	NA <sup>7</sup>	Yes*	NA <sup>9</sup>	NA <sup>9</sup>	NVR	NA <sup>9</sup>	No

ID	CSO - Step 1	RE - Step 1	ICMS - Step 1	Overall Step 1	CSO - Step 2	RE - Step 2	ICMS - Step 2	Overall Step 2	CSO - Step 3	RE - Step 3	ICMS - Step 3	Overall Step 3	CSO - Step 4 - Part A -	RE - Step 4 - Part A	ICMS - Step 4 - Part A	Overall Step 4 - Part A	CSO - Step 4 - Part B	RE - Step 4 - Part B	ICMS - Step 4 - Part B	Overall Step 4 - Part B	CSO - Step 5	RE - Step 5	ICMS - Step 5	Overall Step 5	Compliance summary
371	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	NA <sup>9</sup>	Yes	Yes*	No
372	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
373	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
374	NVR	Yes	Yes	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	Yes	NVR	Yes	NVR	Yes	NA <sup>7</sup>	Yes	NVR	NA <sup>9</sup>	NVR	NA <sup>9</sup>	Yes
375	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	Yes	Yes	Yes	Yes	No	No	NA <sup>7</sup>	No	Yes	NA <sup>9</sup>	Yes	Yes*	No
376	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No
377	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	NVR	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
378	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NVR	NA <sup>9</sup>	Yes
379	NVR	NVR	Yes	Yes	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	Yes	Yes	NVR
380	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
381	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	Yes	Yes	Yes	NVR	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NVR	NA <sup>9</sup>	NA <sup>9</sup>	Yes
382	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	No	Yes	Yes	Yes	Yes	Yes	NA <sup>7</sup>	Yes	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	NA <sup>9</sup>	Yes
383	NVR	NVR	Yes	Yes	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR	NVR	NA <sup>7</sup>	NVR	NVR	NVR	NVR	NVR	NVR
384	Yes	NVR	Yes	Yes	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	No	NVR	NA <sup>7</sup>	No	NA <sup>2</sup>	NVR	NVR	NA <sup>2</sup>	Yes	NVR	NA <sup>7</sup>	Yes	No	NVR	NVR	No	No
385	Yes	NVR	Yes	Yes	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	No
386	Yes	NVR	Yes	Yes	Yes	NVR	NVR	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	NVR	No	Yes	NVR	NA <sup>7</sup>	Yes	Yes	NVR	NVR	Yes	No
387	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	NA <sup>9</sup>	NVR	Yes	Yes	No
388	Yes	NVR	Yes	Yes	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	Yes	NVR	Yes	Yes	No	NVR	NA <sup>7</sup>	No	No	NVR	Yes	Yes	No

ID	Total yes
Compliance summary	58
Overall Step 5	148
ICMS - Step 5	91
RE - Step 5	12
CSO - Step 5	89
Overall Step 4 – Part B	180
ICMS - Step 4 - Part B	NA <sup>7</sup>
RE - Step 4 - Part B	34
CSO - Step 4 - Part B	155
Overall Step 4 – Part A	224
ICMS - Step 4 - Part A	151
RE - Step 4 - Part A	76
CSO - Step 4 - Part A -	140
Overall Step 3	99
ICMS - Step 3	NA <sup>7</sup>
RE - Step 3	34
CSO - Step 3	77
Overall Step 2	242
ICMS - Step 2	160
RE - Step 2	84
CSO - Step 2	171
Overall Step 1	388
ICMS - Step 1	388
RE - Step 1	79
CSO - Step 1	295

# Appendix 8

## The Commission for Children and Young People and Child Guardian Community Visitor Zones



# Appendix 9

## Dictionary and Abbreviations

### Administrative compliance

A report of the number of Aboriginal and Torres Strait Islander children and young people placed with Indigenous or kinship carers (an outcome of the decision making process) rather than a report of the number of placement decisions that complied with each requirement of the decision making process prescribed in section 83 of the *Child Protection Act 1999* when making a placement decision for an Aboriginal and/or Torres Strait Islander child or young person.

### Case plan

A written document identifying the goals of the ongoing child protection intervention with a child and the outcomes and actions required to achieve the goals. The *Child Protection Act 1999* states that every child who is in need of protection and requires ongoing help (such as those in out-of-home care) must have a case plan<sup>148</sup> that is reviewed regularly.<sup>149</sup> At a minimum, case plans must be reviewed every six months.<sup>150</sup> The plan should be focused on meeting the child's protection and care needs, and is developed in a participative process between Department of Communities, the child, the child's family and other significant people.<sup>151</sup>

### Children (when used within the context of the Commission Views of Young People Queensland Reports)

Persons aged 5 to 8 years.

### Children and young people or children

Persons aged 0 to 18 years.

### Child protection order

Under section 54 of the *Child Protection Act 1999* an authorised officer may apply to the Childrens Court for a child protection order for a child. Section 59 of the *Child Protection Act 1999* specifies that a court may make a child protection order only if it is satisfied the child is in need of protection and the order is appropriate and desirable for the child's protection.

### Child Safety Officer or CSO

Child Safety Officers provide statutory child protection services to children and families through:

- undertaking the roles of an authorised officer under the *Child Protection Act 1999*
- the application of relevant legislation, delegations, policies, procedures and quality standards

<sup>148</sup> Section 51C of the *Child Protection Act 1999*.

<sup>149</sup> Section 51A of the *Child Protection Act 1999*.

<sup>150</sup> Section 51V of the *Child Protection Act 1999*.

<sup>151</sup> Section 51L of the *Child Protection Act 1999*.

- working collaboratively with approved carers, the community, government and non-government service providers.<sup>152</sup>

### **Child protection system or child safety system**

The child protection system includes the services collectively delivered by the Department of Communities (as lead agency) and relevant government service providers, including Queensland Health and the Department of Education and Training as well as non-government service providers. The system also includes children and young people of whom the Department becomes aware because of allegations of harm or risk of harm, regardless of whether these children enter out-of-home care.

### **Child Safety Service Centre or CSSC and Child Safety Region**

Regional offices of the Department of Communities (see regions).

### **Commission Community Visitors or CVs**

Employees of the Commission who monitor the safety and wellbeing of children and young people in out-of-home care by conducting regular and frequent visits and advocating on behalf of children and young people to resolve any issues.<sup>153</sup>

CVs regularly visit children and young people in out-of-home care and, after each visit, prepare a written report relating to the outcomes of their discussions with the child or young person and their observations of the standard of care provided. In 2009-10, a new report framework and information management system (called Jigsaw) was introduced to enhance CV reporting and individual and systemic advocacy.

### **The Department of Communities**

The Department of Communities is responsible for the following areas of service delivery in Queensland:

- Aboriginal and Torres Strait Islander services
- Child Safety
- Community
- Disability and Community Care
- Housing and Homelessness
- Multicultural
- Sport and Recreation
- Women

In the majority, this report refers to the services provided by the child safety service delivery areas.

### **Harm**

Under section 9 of the *Child Protection Act 1999*, harm to a child is defined as any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.

<sup>152</sup> Accessed at <http://www.childsafety.qld.gov.au/practice-manual/introduction/cssc.html>.

<sup>153</sup> Chapter 5 of the *Commission for Children and Young People and Child Guardian Act 2000*.

### Integrated Client Management System or ICMS

ICMS is a statewide information system designed to enable staff to view comprehensive client histories, facilitate informed decision making and the enhance the effectiveness of interventions.<sup>154</sup> The system is intended to provide frontline staff with comprehensive information about children and young people at risk, their families and their carers. ICMS replaced the existing Child Protection System (CPS) and Families Information System (FAMJY) in 2007.<sup>155</sup>

### Indigenous Child Placement Principle

A decision-making process that must be observed when placing Aboriginal and Torres Strait Islander children and young people in out-of-home care, as described in section 83 of the *Child Protection Act 1999*.

### Out-of-home care (and the reporting on services provided to children and young people in out-of-home care)

Out-of-home care refers to placements of children, subject to statutory child protection intervention, with individuals and services approved or licensed under the *Child Protection Act 1999*. Out-of-home care includes placements with:

- a licensed care service, or
- an approved carer.

The Department of Communities reports on this group of children and young people as follows:

1. Subject to protective orders:  
This measure includes all children and young people subject to short and long-term child protection orders and court assessment orders.
2. In out-of-home care:  
This measure is reported in accordance with the nationally agreed reporting definitions. It includes care provided to all children and young people in out-of-home care (including foster care, kinship care, provisionally approved care and residential services).
3. Living away from home:  
Data reported under this category includes all children and young people who have been removed from their home, regardless of whether the placement is departmentally funded or unfunded. It is important to note that not all of these children and young people are subject to a protective order, but are subject to some form of intervention by the Department.

The reporting on the services provided to children and young people in out-of-home care is also impacted by their custody and guardianship arrangements. The child protection system is required to provide more services to children and young people in the custody or guardianship of the chief executive, for example Education Support Plans and Child Health Passports.

For children and young people in out-of-home care, the Commission's Community Visitor Program is legislatively obligated to visit children and young people who are in the custody or guardianship of the chief executive.

<sup>154</sup> Accessed at page 16 <http://www.childsafety.qld.gov.au/department/annual-report/documents/dchs-annual-report-2006-full.pdf>.

<sup>155</sup> Accessed at page 47 <http://www.childsafety.qld.gov.au/department/annual-report/documents/dchs-annual-report-2006-full.pdf>.

This means that the reporting on services provided to children and young people in out-of-home care is a complex matter. Care has been taken throughout the report to clearly identify the population to whom is being referred.

### Recognised Entity or RE

An entity (an individual or organisation) with whom the Department must either provide the opportunity to participate in decision-making processes for significant decisions or consult with for all other decisions relating to the protection and care of Aboriginal and Torres Strait Islander children, as outlined in sections 6 and 83 of the *Child Protection Act 1999*.

### Regions

The Child Safety Service Centre regions are as follows:

- Brisbane region
- Central Queensland region
- Far North Queensland region
- North Coast region
- North Queensland region
- South East region
- South West region

### Residential care

Non-family based accommodation for children and young people in out-of-home care. A licensed residential care service include rostered staff models and group homes, and may provide up to 24 hours a day care for children between the ages of 12-17 years. A younger child may also be placed in a licensed care residential care service where they are part of a larger sibling group, to keep siblings together. These placement types occur in a group setting of up to six young people.<sup>156</sup>

### Systemic issues

Includes issues relating to children and young people in the child safety system which have affected, or will potentially affect, more than one child in a way detrimental to their rights, interests and wellbeing.

### Young people (when used within the context of the Commission Views survey)

Persons aged 9 to 18 years.<sup>157</sup>

<sup>156</sup> Page 12, chapter 5, *Child Safety Practice Manual*.

<sup>157</sup> Page 3 of *Commission Views of Children and Young People in Foster Care, Queensland, 2008*.

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