Report

TEI Program Reform South Eastern Sydney District Workshops

Department of Family & Community Services

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REPORT: I

INTRODUCTION

The NSW Government has initiated a reform of the Targeted Earlier Intervention (TEI) Programs, managed by the Department of Family and Community Services (FACS), which cover a broad spectrum including:

- Community development
- Prevention and early intervention
- Support to families with greater need.

Under these categories are nine programs, all of which aim to improve child and family outcomes and build community capacity. The nine programs are:

•	Child Youth and Family Support (CYFS)	\$54.2m
•	Community Builders	\$43.1m
•	Families NSW	\$26.5m
•	Youth Hope	\$10.2m
•	Staying Home Leaving Violence	\$5.0m
•	Aboriginal Child Youth & Family Strategy	\$4.3m
•	Integrated Domestic & Family Violence Services	\$3.5m
•	Getting it Together	\$2.1m
•	Positive Parenting Program (Triple P)	\$0.48m

FACS has recently released a *Sector Consultation Paper* as part of the engagement process on the TEI reforms¹. The paper sets out the reform aims, which are to:

- Improve outcomes for clients of targeted earlier intervention services
- Create a service system continuum grounded in evidence-based best practice
- Target resources to those with the greatest needs
- Facilitate District decision making on the design and delivery of local services
- Increase flexibility so that clients are the centre of the system.

http://www.facs.nsw.gov.au/__data/assets/pdf_file/0005/335165/CS_TIER_consultation_paper.pdf



¹ Department of Family and Community Services 2015, *Targeted Earlier Intervention Programs Sector Consultation Paper*,

The consultation process for the TEI reform comprises several elements:

- · District responses to the Sector Consultation Paper
- Specific cohort consultation sessions (managed by the Families and Place Unit of the FACS central office in consultation with peak organisations)
- District-led consultation sessions with the local sector
- Inter-government consultation (managed by Families and Place).

To assist the District-led consultations with the local sector, Families and Place offered to provide an external facilitator and Nexus was subsequently engaged to facilitate sector consultations for a number of the 15 FACS Districts. This paper summarises the key outputs of the facilitated workshops for the South Eastern Sydney District held in Strawberry Hills on 28 September 2015. The report is structured is follows:

- Section 1 presents some key themes that emerged across all the District consultations
- Sections 2 to 5 present the data from the small group discussions of four TEI reform questions:
 - 1. What works well with the current District TEI services and service system?
 - 2. What are three key things you would change to improve the way TEI services are delivered in the District to vulnerable children, families and communities?
 - 3. What are three key things you would change to improve FACS's management of TEI programs?
 - 4. How would you like to be informed and involved in the reform and consultation process?

The data for sections 2 to 5 were derived from 'report back templates' (see appendix 1) that were used to capture the key messages from the small group discussions. It should be noted that these data are in raw form and have not been edited or analysed. Accordingly, the responses should not be read as representing a consensus and, indeed, some responses are in conflict with others.

Nexus has also prepared a report that consolidates the key state-wide themes across the above four questions.



1. KEY THEMES

Fourteen key themes or 'areas of concern' emerged from our consultations across *all* Districts:

- Flexibility
- Service coordination
- Service integration
- Resourcing and procurement
- Data collection and reporting
- Outcomes measurement and evaluation
- Evidence-based decision-making
- Capabilities of the sector
- Responsiveness and adaptability
- Service relevance/legitimacy
- Autonomy
- · Continuum and quantum of services
- Engagement
- Client-oriented service design.

Many of these themes cut across issues of service system design, service delivery, program improvement and program support. It is important to note, however, that these themes resonate differently, depending on the context that which they refer to, and to keep this in mind when drawing insights from the data presented in the next sections.

For example, while service flexibility was identified frequently across all districts, it was used in different senses. In many cases, flexibility referred to either increased service provider autonomy in decision-making, and in some cases, less rigid contractual arrangements. From the perspective of the service system design and service delivery, flexibility was also identified as the general 'sector or system capability' required in order to accommodate differences in delivery styles, service culture and ways of working, and to adapt to different community or client needs. In other contexts, flexibility referred to a broadening of program guidelines, definitions (particularly definitions of early intervention) and funded activities, and implies program design change, rather than system change necessarily.



2. WHAT WORKS WELL

What works well with the current District TEI services and service system?

- Partnerships are working well in SE Region. TEI services combine and interact with differently funded services
- Interagencies are working well together to incorporate a broad spectrum of support to clients
- Recognition of non-funded early intervention provision i.e. already flexible and creative
- Each area has its own character and local knowledge
- Finding creative solutions
- Valuing and recognition of existing knowledge and expertise
- Current programs are working well already
- Good relationship with CPO is critical. Continuity is critical
- SGS News is good for distributing information. St George Child and Family interagency have created an "early intervention" subgroup which is evidenced based - very effective. Key projects will be developed on the basis of local data
- Integricare collaborative practice through playgroup soft entry to service for warm referrals & CALD information sessions - provides clear pathways for communities
- Community events like Migrant Information Day are good opportunities for early intervention through identified priorities. Child & Family Services are terrific
- Local accessible services rather than broader generic services
- More relevancy to local services history/local knowledge
- Networking within local organisations greater opportunities for collaboration/sharing of resources
- A balance between universal and targeted intervention
- The value of small organisations that are innovator
- Good governance when it works well
- Relationship with other government services e.g. Health, FACS, Police



- Child and family interagencies great mechanism for sharing information.
 FACS funding supports interagency networks and this allows a free flow of information for programs servicing children 0-12. However, there is a gap for children over 12
- Family Referral Service connects people to different services and provides information. Should be for longer than 6 weeks
- Subsidy towards existing positions e.g. In councils or disability services, creates 'value for money', attracts more funding and in-kind support
- Small amount of money goes a long way if it is targeted e.g. at an ethnic specific community
- Limited resources urge services to work together
- Local base, local knowledge offer a wrap around service as funded from a variety of programs. Strong links with other support agencies including FRS
- Services
- Place based in marginalised communities where community have ownership and control
- Active engagement/support for local community members to identify needs/program delivery
- Soft entry to universal programs to build trust and connection to services
- Safer referral crisis intervention (DV)
- Provide childcare for counselling (DV)
- Partnerships
- Work well with local district office and CPOs
- Different forums/panels with other departments and agencies
- Client specific
- Outcomes: service provision, making connections, client support, increased knowledge
- Active council important and partner and resource e.g. planning/coordination/service support
- Family interagency works well
- Soft entry points work well to connect with client
- Current provision/variation of service delivery e.g. youth need access to affordable/free/confidential health/counselling services even though area is known for being 'affluent'



- Community capacity building key asset to keep people supported, resilient and well and healthy
- Non-clinical approaches with good referral pathways to more intensive support
- Targeting existing service outlets for integrated support e.g. supported playgroups/health
- Shack Youth Services soft entry program no strings attached formal support, intro to other services/case management. No end date for support - can remain with service from 12-18 years. 14 plus can access service without parental consent
- Coordination between/collaboration between any services being able to jointly work some cases - partnership
- This area working well in supporting families from universal level to tertiary level
- Able to find solutions through positive partnerships
- Can accept self referrals and voluntary service
- Flexibility in programs over time been able to renegotiate and make changes in response to needs and experiences
- When stability in FACS staff good relationships were important for service providers in terms of information flow and relationships
- Diversity in programs works well community hubs, social inclusion programs, playgroup etc provide many soft entry points which is not judgemental, no stigma - local presence is key to engaging with the community
- Family worker stream within FNSW not time limited
- Strong partnerships between organisations
- Competitive funding compromises it
- Different entry points engage families and vulnerable people e.g. soft entry programs identify further needs
- Recent opportunities to review service contracts
- NGOs ability to stretch funding are flexible to family/YP/community needs even though not funded
- Broad funding enables flexible person-centred approaches not a limited timeframe
- Soft entry points
- NGO ability to stretch funding even when program is prescriptive



- Collaboration
- Local NGO have niche speciality
- Programs are inclusive even when targeted (open to all community) (except for youth programs - used to be over 18s not only up to 18 which is not a good thing)
- Community Builders program not restrictive in terms of assessment
- Having targeted youth programs and early childhood
- Partnerships within NGO services help build trust within the community in which we work
- Communication with FACS response relationship manager
- Clarity around service/number requirements
- Flexibility in targets
- Goodwill between different agencies trying to meet client needs
- Collaborative practice
- Better system reporting FACS portal
- Improved relationships FACS/NGOs
- Flexibility with some CPOs (not others)
- Good interagency/good network system (early years)
- We do good work with limited resources
- Partnerships
- Funding of interagency service coordinators cross collaboration of services for outcomes (being aware of services, referral processes)
- YP can keep coming back
- Brokerage flexibly and dynamically applied
- Soft entry points neighbourhood centres
- · Partnerships to provide specialist care
- Youth Hope
- Services have ability to make informed decisions about program delivery
- Good relationships with CPOs (FACS) allow for responsive action when needed
- Broad range of services
- All working toward a common goal
- Generalist approach/soft entry opportunities



- Agencies collaborative strengths of smaller organisations
- Expertise, highly skilled, qualified staff
- Smaller organisations very good value for money



3. IMPROVEMENTS TO TEL SERVICES

What are three key things you would change to improve the way TEI services are delivered in the District to vulnerable children, families and communities?

- Restrictions around service delivery need more flexibility to become more client centred
- Flexibility for service to follow client from one geographical area to another
- More time for CPOs to support services i.e. less admin load
- More autonomy to design delivery of support to clients
- Reporting mechanism/data collection to be improved not just numerical more context outcome based
- Mechanism for raising issues
- Better streamlining/reporting tool across all programs and simplified
- Flexibility in PLAs in terms of location, demographic, age groups of target groups e.g. 9-12s, service delivery is targeted to "historical" groups, not evidence based/gap analysis data - informing actual groups
- Competitive tendering process means organisations are competing against each other rather than working together
- Client based funded service directorial use technology (as in UK) to better deliver services
- No services for children victims of DV not therapy but trauma informed group work to validate and normalise - need early intervention for children and youth in DV situations e.g. Brick and Circle of Safety
- Looking at transition points from youth to adult and child to youth i.e. flexibility of funding for age groups (11-14) (17-25)
- Time limited criteria is not beneficial for children and families for long term outcomes. Trauma informed care that is long term has evidence of greater outcomes for children and families
- Limited resources for DV is not reflective of the need that exists cuts across all ages and demographics
- Flexibility in contracting and funding arrangements and program guidelines to allow different services to work with clients and focus on client outcomes
- Ability to provide wrap around services with individual families flexibility in funding to do so



- Urgent need to bolster services that underpin earlier intervention programs - counselling and mental health, affordable housing
- Funding for psychology/counselling to detention centre for children
- Push to move crisis cases into early intervention creates a gap in genuine early intervention
- More flexibility to adjust service specific reforms with changing needs and priorities in the community
- Gove more money, increase funding
- Reporting not rigorous enough, one size fits all generic approach
- An overarching outcomes measurement framework for all TEI (or even FACS) services
- Allowing for qualitative, observational data
- Ensuring client-focussed service delivery is always balanced within the family context
- Services to extend/view their response to individuals as extending beyond the paid response. Making connections within community to build the resilience of individuals and families
- More flexibility of program timeframes when working with clients and families experiencing major trauma
- Offer opportunity for supported decision making within a risk framework
- Support smaller localised services to know community/needs before deliverables agreed upon
- Remove restrictions on access to counselling/case management service restrictions/timeframe
- Skills training
- Referral pathways capacity
- Data and information/statistics specific to area and district. To be shared with agencies
- Reporting is about outputs quantity vs. qualitative. Improving survey. Improving feedback mechanism. More outcome focus and less output
- All the TEI funded services come together once a year to update and report back
- Longer-term contact i.e. 5 years
- More funding for 18-25
- Work more with families/clients on waitlists



- Less restrictions around client group definitions and program 'outputs' be more responsive when client needs change
- Closer collaboration/resource sharing with schools, OOSH etc. Other networks, private
- Consulting with experts/providers/grass roots to develop service packages that work
- Continuation of funded facilitator to support C&I integration similar model for youth service network
- Build new/strengthen relationships with the larger NGOs
- Transition period from childhood to adolescent continuum of care (primary to high school)
- Being funded for specific ages of children
- Realistic targets
- More meaningful/stronger relationship with FACS
- Better reporting tools
- Services that can work with the entire family with children and adolescent in the family unit
- Vulnerable families with high or complex needs, DV access EIPP and FW in FNSW - nowhere to refer, skill set not suitable, too high risk - needs additional resourcing, training, better referral pathways
- More flexibility in geographic boundaries supported by strong local partnerships and good referral pathways
- Measuring outcomes from work we do need to be clear what FACS want and have better access to data from FACS; need data to drill down to create understanding
- Stretched funding means limited flexibility in program delivery or reliance on volunteers
- Pressure on services to take on complex clients
- "Service Trap" too complex, not complex enough
- Movement of service delivery to "unallocated cases" e.g. Brighter Futures/FRS Families/young people that sit between unallocated and universal are not getting a service
- Programs not inclusive of broad "extended family/communities" e.g. a parent who has children removed
- Longer funding cycles



- Client centred continuity of care
- People falling through gaps e.g. between unallocated specialist services and universal services
- Data collection please share outcomes
- More centralised sharing of information re: services (and comparison with other services)
- Age parameters are too artificial and limited
- FACS to provide more training for services
- Soft entry points could work better
- \$ taken out of SESD
- More targeted CALD TEI services
- More hub approach multi-disciplinary
- To target and directly respond to the current service system of what is in existence and what is funded e.g. the fact that a whole lot of services got cut in SES District during Youth Links to Learning tendering last year, and due to Federal DSS tendering - also work with new NDIS services
- Have more targeted CALD services
- Data collection and measurement of outcomes. How are these shared?
 Outcome sharing
- Access to direct service delivery. How to find services? How do we encourage cultural shift?
- Broader universal education and family support campaigns linked with more direct service delivery
- Centralised information database for Federal, State, NGO, philanthropic services
- Therapeutic intervention exploration and intervention on broad/holistic issues affecting families
- Age range is limiting. Remove age range limitations and time limitations
- Unit cost calculation leads to number chasing as opposed to flexible to deliver less occasions of service - more work with those with high needs
- Increase in FACS provided training shared knowledge, best practice, culturally appropriate
- Increase early intervention for ATSI and recognition of the challenges that work with Aboriginal families



- Increased emphasis on engagement and valuing things such as food, drop in centre, school holiday
- Programs for children not labelled or diagnosed but general programs supporting children (all inclusive)
- Bi-lingual workers to provide what is available
- Parenting in other languages
- Cultural norms and expectations
- Gap between Brighter Futures and these programs
- Multi-disciplinary approach hub of specialist services to cover whole family
- Engage systematic processes to engage everyone churches, neighbourhood centres
- Longer funding cycles needed funding security assists growth and innovation
- De-politicise notion of EI not at cost of other groups
- Client-centred continuity of care to be able to follow clients along the continuum of need
- NZ relapse plans to be set for people after progress through service



4. FACS'S PROGRAM MANAGEMENT

What are three key things you would change to improve FACS's management of TEI programs?

- More time for CPOs to resource services, without micromanaging
- More flexibility in program design e.g. to enable services to be flexible on a case by case basis
- Empower FACS management to require manageable timeframes for services to respond to requests for data and feedback
- · Work within existing programs to look at what is working well
- Closer links across departments: FACS/education/health/housing
- Collect and share data (regional) and use to make strategic decisions about funding and service delivery. Include a funding/service map for region (no \$\$ information)
- FACS should make sure that funded organisations have capacity/skill/experience to fulfil the role, and manage outcomes/accountability, monitor for quality service
- Greater partnerships with FACS/NGO service visits for the sake of relationship
- Discussion about CPO moving in/out so often, however there is value in a new CPO for probity/transparency/accountability. Perhaps a rotation of CPOs
- Greater collaboration and consultation with relevant government agencies who jointly partner with NGOs
- Streamline data collection to reflect outcomes
- Length of funding inconsistent with providing long term trauma informed support
- Trauma informed resources and need/input should be understood by FACS
 not mentioned in FACS TEI paper
- Expensive to deal with traumatic issues this must be recognised
- Better education around Chapter 16A of the Care Act fact sheets
- Five year funding cycle much preferable to two year funding cycle



- Define early intervention align it with program guidelines and eligibility criteria
- Reporting: review reports, analysing service outcomes, better understanding of what happens on the coal face and keeps services vigilant
- Flexibility and open dialogue to move across other TEI programs and re-negotiate PLAs without concern about loss of funding
- Red tape reduction, funding other ways of engaging with funded services less paperwork, more time with clients and program implementation
- Inclusion
- Streamline metadata on FACS website for keyword searching
- Consistent language used across programs to help provides understand assessments
- Showcase good practice across the variety of programs and include support from social impact
- Reporting compliance (onerous no feedback to services)
- Data for local area assist in service development
- FACS CPOs need knowledge of service/issues/area
- FACS provide data back to agencies
- Co-design (future planning) date informed, opportunities to address risk/adjust service delivery/review
- Better ongoing support/engagement from FACS to continually improve service delivery
- Multiple reporting funding streams too much reporting
- Better communication re: CPO changes
- Real feedback on the stats once added into portal. Collating the stats from all services and combining feedback so we can be aware of what everyone else is doing
- Transparent local decision making. Flexibility and appeal when decisions are made
- More contact with FACS re: strategic planning, information sharing around emerging needs; data from district for service planning and delivery and improvements/innovation
- Re-introduce multi-disciplinary focus on planning and meetings
- Develop program specs together and review more frequently





- Follow clients journey through different programs in terms of referral outcomes and improvements/gaps
- Use funding reports to promote best practice/highlight case studies
- Better data collection tool so outcomes/stories can be shared more qualitative data can be collected. This can be used then to put in for grant requests (results based accountability)
- Regular face to face meetings with CPOs (3 times a year)
- Realistic outcomes to meet/understanding of our service delivery
- Consistency in information that all FACS staff have and dissemination to NGOs - so all are consistently informed
- Providing feedback to services on data submitted to improve quality in service delivery and design new programs, understand trends
- FACS play a role in engaging with other government departments (and other parts of FACS) and building relationships to facilitate NGOs work with these agencies on behalf of families and vulnerable people
- Service specs that reflect lower needs e.g. between CP and universal
- Service specs that run for 5 years to achieve outcomes
- Data collection is output e.g. numbers of attendance not outcomes
- Less resources spent on name changes, new logos, changes of project officers
- Communication can be one-way or punitive
- Recognition of diverse service provision
- Consider pockets of disadvantage and funding local organisations with local connections
- Portal does not reduce reporting e.g. forms have to be downloaded for approval then uploaded
- The feedback surveys are not relevant through Community Builders
- No consistent between CPO management across district
- CPOs ability to make changes to PLAs etc is limited
- CPO handover should be better to avoid loss of corporate knowledge
- Meaningful and consistent reporting, not over-reporting
- Surveys are awful
- Map existing community landscapes to ensure no loss of continuity if contracts are reduced



- Feedback for data submitted to assist service improvement, to identify best practice
- Outcomes rather than outputs
- CPOs different styles, handicapped similar to NGOs
- Involve sector in planning program types and funding
- NGO prefer to have review of programs before decisions are made
- Not just consultation and advice but involvement in decision making
- FACS needs to coordinate services to facilitate better collective impact within the community e.g. as one program funding being cut, the skills (workers) and knowledge can be introduced to other services with new funding/opportunity
- To have targeted specifically for different CALD communities more CALD services
- Health funding/probation parole should come under FACS management
- FACS to facilitate business grants from other departments and look into social enterprises as part of services management - sustainability model
- Feedback on the data both outcomes and service delivery. Sharing results from various service providers
- Integrity of data universal definitions for reporting clarification on this. Definitions that are client focused
- Sharing of service knowledge per region/district
- Budgeted collaborative practice/relationship building across service providers - e.g. Network meeting/conferences
- Linking TEI projects with other community services NGOs/other funded services
- Timely feedback
- Reporting/program/system clarity
- Understanding of organisational structures/roles and responsibilities
- Consistency between CPOs and local knowledge and understanding dynamics of specific communities; improved handover between CPOs
- CYFS data tool takes too much time and produces very limited useful data what's the point
- Feedback on data context in bigger picture
- Meaningful reporting
- Consistent reporting (across the various districts)



- Mapping of community landscape keep community engagement process
- Engage at a very local area
- Small local services who rely on the current funded services are still able to function and be supported
- FACS to have a mechanism to bring the surrounding services e.g. police, correction, education to know who to contact - coordinated approach from FACS rather than many small committees (crossover)
- Local decision making re: funding allocation
- Clear and transparent communications
- Recognition FACS and NGOs are in partnership
- Better data collection systems to measure outcomes currently measures mostly outputs
- Sector needs to be involved in FACS decision making processes in relation to programs and funding
- Clarification and review of current dollar value of types of service delivery
- Recognise true cost of programs can be replaced by alternate funders



5. TEI REFORM CONSULTATION

How would you like to be informed and involved in the reform and consultation process?

- Receive feedback from consultation with the opportunity to then respond
- Mapping exercises to look at existing services who deliver TEI outside of and including funded services e.g. Links to Learning
- No loss of funding. Looking at data for each region to demonstrate need in areas
- Share contact list of all here today
- More opportunities for round table feedback, enabling cross-service sharing of information and opportunities
- Map of services
- Direct feedback via email
- Consultation process much like today where stakeholders are given opportunity for feedback
- More local venues for greater participation also considering time i.e. school holidays etc
- Greater opportunity for a more local CSC level to discuss local issues
- Information about what is happening with funding beyond June 2016 if reforms are not wrapped up by then
- More detail on how those numbers/funding are calculated
- Ongoing, focussed consultation
- Checking in at all stages with the sector to ensure all are on board and have input as well as ownership
- General comment: impact of homelessness on all community members this needs to be understood when designing the reform
- Opportunity to see the reform design in its formative stages
- NB prior to decision being made
- · Link reform design back to evidence base
- Consideration given to manage client anxiety
- Messaging for community about the reforms



- Provide a demographic snap shot to participants today to help shape our response/input into the design
- Co-design with local service providers
- Emails
- Local district planning meetings
- Regular feedback process, as frequent as practical
- Summaries
- Major feedback to have face to face feedback with CPO
- Return to hear what's been collated, analytical discussion
- Feedback on all of the districts, not just our own
- More timely notice of consultation events
- Email updates
- Demonstrate how consultation feedback has been used
- Webinars with options for discussion with CPO after presentations
- Information to be cascaded down to team leader level
- Right people at right meetings. Thought today was a briefing. A consultation is different process and would have prepared differently
- Want the opportunity to be informed on proposed details of service models and to have a chance to discuss with FACS/other services and to respond
- Opportunity for NGOs to engage in District planning processes with FACS in Eastern Sydney, including FACS providing information on the pockets of disadvantage in the area, and input to service model planning
- Use a range of media to consult including forums, webinars etc and allow realistic timeframes
- At some stage would be good for a government agonies come together
- Provide services with regular updates in small chunks/less jargon
- Further information on how government agencies will be consulted
- Improved tone of communication
- Recognise people might be good a policy issues (not grass root issues)
- FACS communities can be patronising and deadlines can be too tight
- Regular information (monthly) re: reform
- Networking opportunities in an informal way
- Opportunity to review the consultation report and comment/amend it



- Have detailed information to map current TEI services, distribution and what they do
- Several iterations consultation draft review consultation before implementation
- Review and consultation of initial implementation (2-3 years of system bedding in)
- Clarity and input on timelines
- Consultation and feedback at the micro and macro level
- Every step of the way though multiple methods forums, survey, emails i.e.
 no big decisions without consultations
- Community forums to inform the sector more broadly
- Clear and transparent processes and timeframes
- Clear and transparent timeframe of what is happening when consult on timeframes (e.g. is 3 months enough time to inform current programs of direction for their transitioning program
- Rollover funding to be announced early to plan clients, staff, equipment, office (not last minute)
- Another consultation when report is available. Model clearly articulated when going into tender. Get the broader picture before tendering e.g. what packages are across the district? What are the negotiables and non-negotiables?
- Consultations
- Former timelines and transition periods
- Regular email updates
- Feedback on what the sector's input has been and how it is incorporated into process
- Regional representation in decision making process about final reform
- Forum with NGOs to review draft reforms BEFORE final decision is made
- How will clients be consulted? What model of engagement will be used?



APPENDIX 1: REPORT BACK TEMPLATE

Targeted Earlier Intervention Reform District Consultation Sessions SOUTH EASTERN SYDNEY DISTRICT

REPORT BACK TEMPLATE

1.

What works well with the current District TEI services and service system?			
. What are three key things you would change to improve the way TEI services are delivered in the District to vulnerable children, families and communities?			
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Targeted Earlier Intervention Reform District Consultation Sessions SOUTH EASTERN SYDNEY DISTRICT

REPORT BACK TEMPLATE

5.	What are three key things you would change to improve FACS's management of TEI programs?	
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