

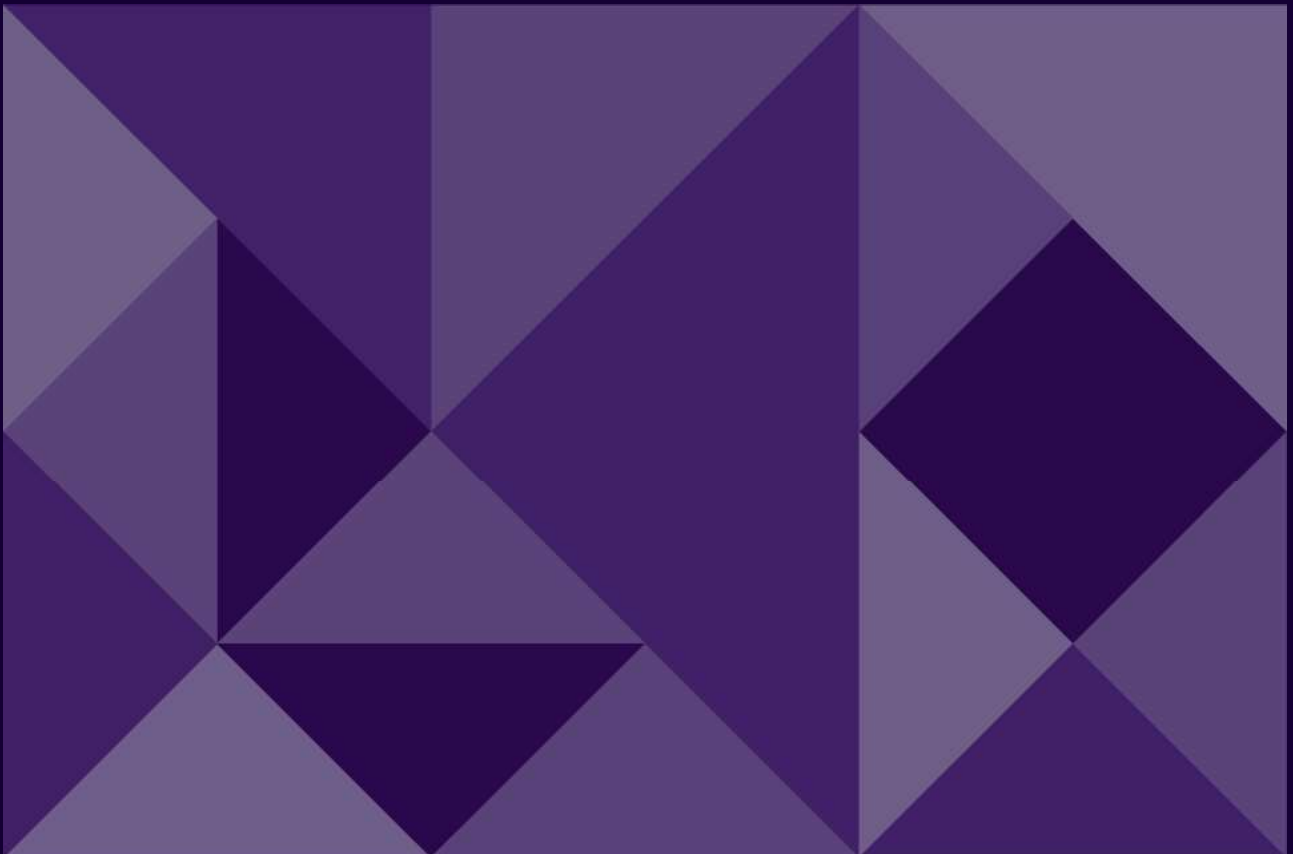
ACIL ALLEN

May 2021

Report to Department of Education and Training

Child Link Two-Year Review

Final Report



About ACIL Allen

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Executive summary

ACIL Allen was engaged by the Department of Education and Training (DET; the Department) to undertake the Child Link Two-Year Review. The Review is a legislative requirement within Part 7A of the *Child Wellbeing and Safety Act 2005* (the Act) and covers the first two years since the commencement of the legislation in February 2019. The overall objective of this Review is to consider the extent to which the activities undertaken during this period to implement the Child Link Register (also referred to as Child Link) will deliver the policy and legislative intent of Part 7A of the Act. The Review's methodology included an in-depth document review of more than 50 project documents and stakeholder consultations with nine key informants from relevant areas of government, the Child Link Board and the Department's Victorian Child Information Sharing team.

Over the period covered by this Review, the design of the Child Link program, as well as the policy planning to support implementation, are both on track and well positioned to deliver the policy and legislative intent of Part 7A of the Act. A number of strengths were identified as key predictors for effective implementation and also acted as safeguards against risks and potential adverse impacts. These include:

- *a strong and effective governance process*: the governance processes that have been put in place for the implementation of Child Link consist of a wide range of representatives from both within and outside government that have the right mix of expertise and experience to oversee the implementation of Child Link
- *extensive and regular stakeholder engagement at every stage of the implementation*: stakeholder engagement with intended Child Link users and other stakeholders at different stages of the implementation, for a wide variety of purposes, has enabled the identification of potential issues and allowed these to be addressed early in the design stage, which in turn ensures Child Link is designed with an appreciation of user needs
- *a phased process of implementation*: a phased approach to implementation has allowed DET, supported by project governance groups, to ensure the feasibility and achievability of various aspects of Child Link and ensure that all known issues are addressed at the end of each phase before moving on to the next phase
- *extensive and regular risk identification and management*: the implementation of Child Link takes a proactive and comprehensive approach to risk identification and management, identifying risks to effective implementation through a wide range of methods and ensuring that these are tracked and addressed.

As the implementation of Child Link moves forward beyond the initial two-year period of design, development and piloting, a number of recommendations have been made to enhance the strengths that were identified within this Review and that reflect stakeholder support for policy planning related to interpretation and use of Child Link information. It is recommended:

Recommendation 1: That the governance arrangements for Child Link continue to be supported to provide diverse expertise and flexibility in meeting the changing requirements of the stages of implementation of the Child Link program.

The diversity, depth and breadth of the Child Link Board was found to be a strong enabler for effective planning and implementation of Child Link. The Board has also been sufficiently flexible, establishing subcommittees to deal with specialised issues, such as the Executive Technology Group in the early stages and more recently the Policy Advisory Group. The continued flexibility of, and support for, the Board will be important in remaining responsive to the program needs as it progresses to the next phases.

Recommendation 2: That a detailed review be undertaken once Child Link is embedded and fully operational to assess the extent to which the initiative has met its objectives.

While this Review sought to be as detailed and extensive as possible, it should be noted that the Review has taken place prior to the operationalisation of Child Link. There is a limit to the ability of the Review to understand the impact of Child Link

on the day-to-day business among service providers and government agencies, and how Child Link in turn contributes to the anticipated improved outcomes for children and their families.

It is understood that the Department of Education and Training has plans to conduct a five-year review of Child Link. Such a review is supported and would enhance the planned five-year review of the Child Information Sharing Scheme.

Recommendation 3: That the Outcomes Measurement Framework and planned Monitoring and Reporting Framework contribute to assessing the uptake of Child Link once it is operational.

There were a number of concerns raised that, despite the very best efforts to train and support workforces and engage in change management, there could be a reluctance to use Child Link once it becomes operational. This has been identified by the Victorian Child Information Sharing team within the Department of Education and Training and significant efforts have been made to mitigate this risk through the User Strategy and Pilot Strategy. Moving forward, the Victorian Child Information Sharing team should work towards the development of the Monitoring and Reporting Framework by the go-live date, based on the Outcomes Measurement Framework for the child information sharing reforms. Implementation of these tools is strongly supported to provide an evidence base for the effectiveness of the reforms and information to contribute to continuous improvement in information sharing practices.

The collection of data through these frameworks will also improve the information available to the planned five-year review of the reforms.

Recommendation 4: That the Department of Education and Training considers further integration of change management and practice change between the Child Information Sharing Scheme and Child Link.

The Child Information Sharing Scheme and Child Link are linked initiatives under the legislated child information sharing reforms. The reforms share a diverse workforce that provide supports to children and families that may receive services from multiple providers. The Department of Education and Training administers both reforms and this structural arrangement is well placed to enable a strengthened coordination of activities to embed reforms in practice. There are numerous opportunities in the change management approaches (such as training, awareness raising and other activities) to reinforce these links and to help stakeholders and users better understand how the Child Information Sharing Scheme's principles relate to the use of Child Link, and how Child Link enables the intent of the Child Information Sharing Scheme.

Recommendation 5: That the Child Link Board when considering workforce readiness has regard for arrangements in place that support Child Link users and the effective integration of Child Link into current practices.

The preparedness of workplaces to integrate Child Link into current operational practice and the relevant workloads of Child Link users will be crucial in ensuring that Child Link users have the capacity to adopt the use of Child Link effectively once it becomes operational. Through the Child Link Board, the readiness of key workforces should be considered particularly in the lead up to their inclusion as Child Link users in line with the Pilot Strategy. This should include taking account of whether there are any other planned reforms or workforce changes that may influence the preparedness of workforces to implement Child Link in their workplace.

Abbreviations

Abbreviation	Meaning
CIS Scheme	Child Information Sharing Scheme
DET; the Department	Department of Education and Training
DHHS	Department of Health and Human Services*
DPC	Department of Premier and Cabinet
ISEs	Information Sharing Entities
MRF	Monitoring and Reporting Framework
OMF	Outcomes Monitoring Framework
PoC	Proof of Concept
RIS	Regulatory Impact Statement
SMEs	Subject Matter Experts
The Act	<i>Child Wellbeing and Safety Act 2005</i>
VCIS	Victorian Child Information Sharing
WoVG	Whole-of-Victorian Government

*Note: Machinery of government changes took effect in February 2021 splitting DHHS into the Department of Families, Fairness and Housing, and the Department of Health

Introduction and Background

1

ACIL Allen was engaged by the Department of Education and Training (DET; the Department) to undertake the Child Link Two-Year Review. The Review commenced in September 2020 and examined the two-year period from the commencement of Part 7A of the *Child Wellbeing and Safety Act 2005* (the Act) on 12 February 2019.

1.1 Victorian Child Information Sharing Reforms and Child Link

1.1.1 The Victorian Child Information Sharing Reforms

The Victorian Child Information Sharing (VCIS) reforms were developed in response to several inquiries, including the Royal Commission into Institutional Responses to Child Sexual Abuse, where recommendations were made to increase the protection of vulnerable children by simplifying and improving information sharing arrangements between trusted organisations and professional entities. These reforms include the Child Information Sharing (CIS) Scheme and the establishment of the Child Link Register (also referred to as Child Link).

Together, the CIS Scheme and Child Link are expected to:¹

- improve early needs and risks identification and support, by permitting professional and respectful sharing of information early
- change a risk averse culture in relation to information sharing, in part by simplifying the legislation
- increase collaboration and integration between child and family services, promoting shared responsibility across organisations that provide services to children and families
- support children's and their families' participation in services to which they are entitled.

1.1.2 Child Link

Requiring the establishment of Child Link responds to specific recommendations from earlier inquiries and reviews seeking to ensure data systems and practices optimise identification of all vulnerable children who could benefit from early intervention supports, and proposing development of a system to track their engagement with services at key stages of childhood. It was envisaged that the proposed Child Link Register would operate as 'an IT enabler that will draw key fields of information from pre-existing government information management systems and display the information in a web-based platform only accessible by a restricted group of authorised professionals'.²

The subsequent legislative reform of the Act to implement the Child Information Sharing reforms includes Part 7A to establish the Child Link Register. The objective of Part 7A is 'to establish the Child Link Register to improve child wellbeing and safety outcomes for, and to monitor and support the participation in government-funded programs and services, by children born or resident in Victoria' (*Child Wellbeing and Safety Act* s1(fb)).

Child Link brings together data from other existing information systems into a single and aggregated source of information. It will include information on all children born in or residing in Victoria and may include information on their engagement in key childhood and funded government services, such as Maternal and Child Health services, early childhood education and schooling (including home schooling), Child Protection and other care services. It is intended that Child Link will assist

¹ Child Information Sharing Reform Background and Overview. Department of Education and Training. Victoria State Government.

² Second Reading Speech, Child Amendment Legislation (Information Sharing) Bill, Hansard 2017.

organisations prescribed under the CIS Scheme by providing authorised users of the Register with critical information about the children in their care so that they can:

- make more informed decisions about the wellbeing, safety, and support needs of a child within their service
- better identify needs, issues and vulnerabilities that may be present to prevent an escalation of harm
- collaborate with other professionals working with the child and family.

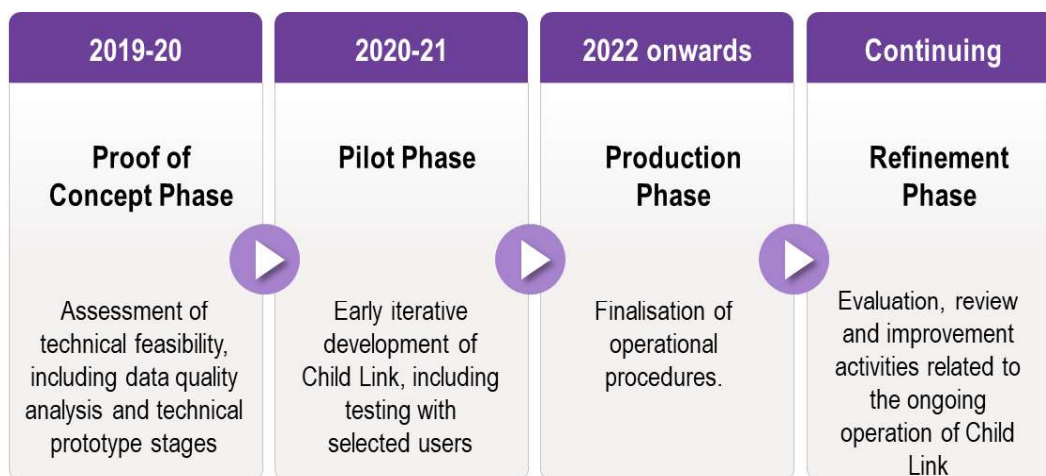
The legislation authorises the Secretary of the Department of Education and Training to collect, use and disclose information for the purposes of developing and maintaining Child Link. Division 4 of the legislation authorises a subset of authorised organisations and services (information sharing entities (ISEs)) under the CIS Scheme to access Child Link and to use the confidential information contained within for purposes stated within Schedule 6 of the Act, or in line with Part 6A, which relates to the CIS Scheme.

Child Link is intended as a collection of key information recorded in existing childhood data systems with limited potential for bias and judgement when accessing and interpreting the information.

1.1.3 Progress to date

The Child Link program is being established through a phased approach with funding to date on a year-by-year basis, supported by a detailed plan underpinning the annual business case. An overview of the program phases from establishment to implementation and beyond is provided in **Figure 1.1**.

Figure 1.1 Overview of the phased approach to implementation



Source: ACIL Allen 2021 based on documentation from Department of Education and Training.

The first phase of the program culminated in the Proof of Concept (PoC), which was funded during the 2019-20 financial year. The purpose of the PoC phase was to conduct essential research to ascertain the core requirements for the commissioning of Child Link. The PoC phase included two distinct stages – the data analysis stage and the technical prototype stage. The data analysis stage involved a detailed assessment of the data from source systems that would be required to develop and maintain child profiles within Child Link, while the technical prototype stage established the potential availability of technological platforms to create the child profiles from source data.

The next and current phase of the program is the Pilot Phase, which commenced in July 2020. This phase will continue until the completion of the Child Link solution, which is legislatively mandated to occur prior to 31 December 2021. The Pilot Phase will:

- build and implement the required Child Link platforms in an agile, iterative manner
- extract child data from all available source data systems
- on-board a select number of Child Link users from across the sector to conduct validation activities on child profiles, which will assist with tailoring of system functionalities to meet the needs of users.

From 2022, the Production and Refinement phases will focus on progressive roll out of Child Link to a broader workforce estimated to be around 25,000 staff members, with a range of system enhancement and expansion activities to support different workforces as they come online.

1.2 Purpose of this Review

An independent review of Child Link is required under Section 46X of the Act, to be undertaken two years from commencement of the legislation. This Review, commissioned by DET, covers a period that includes the PoC phase and a significant proportion of the Pilot phase, and is required to consider the development of Child Link to date, with a particular focus on:

- consideration of the adequacy of the design of the Child Link implementation program, and policy planning, in achieving the legislative intent of Part 7A of the Act
- identification of any likely future adverse effects of the design of the Child Link implementation program and policy planning, within the Review period
- making recommendations on any matter addressed in the Review to inform future phases of Child Link.

1.3 Review methodology and approach

The Review methodology involved document review and stakeholder consultations targeting key informants. The document review included approximately 50 different documents covering a broad span of activities. The documents related to the first two phases of the program and included final and draft material reflecting the continuous developmental work over the first two years to establish Child Link. Documents broadly related to:

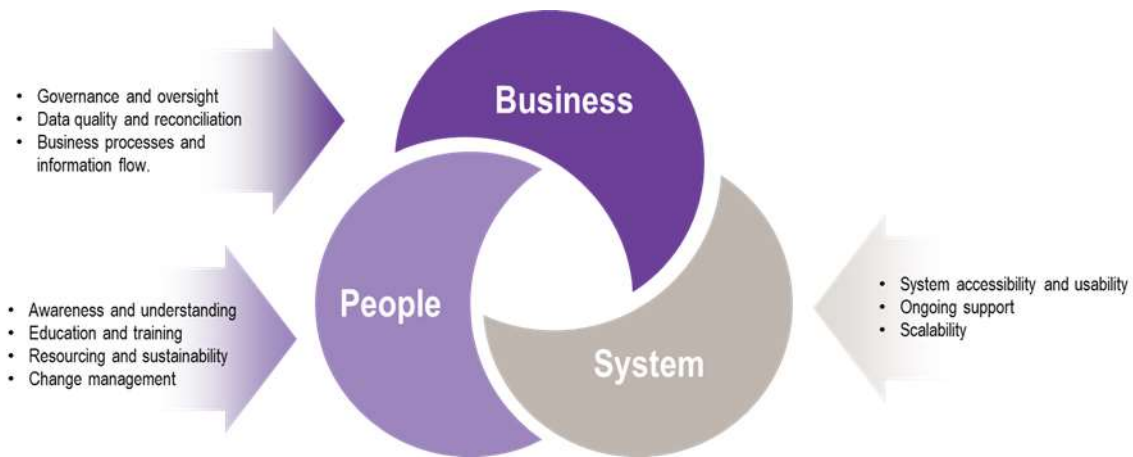
- phased implementation approach
- governance and assurance activities
- proof of concept and pilot strategy
- stakeholder communication planning
- frameworks for monitoring and measurement of the initiative.

In addition to the document review, in-depth interviews were held with key staff within the Department's Victorian Child Information Sharing (VCIS) team, who are responsible for the implementation of both the CIS Scheme and Child Link, as well as a selection of key members from the Child Link Board. The Child Link Board is the highest governance body for Child Link and reports to the Secretary of the Department and the responsible Ministers.

1.4 Review framework

A review framework was developed that considered the key objectives of the Review (see section 1.2), overlaid across three key areas of focus relating to people, business and system. These key areas of focus are illustrated below.

Figure 1.2 Review focus areas



Source: ACIL Allen 2020

The detailed review framework considered these three focus areas in the context of the overall Review objectives.

1.5 Structure of this report

The structure of this report is aligned to the review framework as follows:

- Chapter 2 examines the findings in relation to Key Review Question 1: *Does the design of the Child Link implementation program and its implementation to date support the legislative and policy intent of Part 7A of the Act?*
- Chapter 3 examines the findings in relation to Key Review Question 2: *Does the policy planning in support of implementation and ongoing operation and monitoring of Child Link support the legislative and policy intent of Part 7A of the Act?*
- Chapter 4 examines the findings in relation to Key Review Question 3: *Is the design of the Child Link implementation program, its implementation to date and the policy planning in support of Child Link likely to have any adverse impacts?*
- Chapter 5 provides a summary of the Review findings and recommendations to inform future phases of the Child Link program.

Design and execution of the Child Link Implementation Program 2

This chapter outlines the Review's findings in relation to **Key Review Question 1: Does the design of the Child Link implementation program and its implementation to date support the legislative and policy intent of Part 7A of the Act?**

2.1 Overall design and implementation of the Child Link program to date

2.1.1 People

Overall stakeholder engagement

Both the document review and stakeholder feedback provide strong evidence of a comprehensive approach to stakeholder engagement within the design and implementation of the Child Link program to date. Stakeholder consultation has been an essential part of the program from the earliest stages, continuing the consultation that commenced with the process of developing the legislative reform to understand the specific needs for child information sharing.

A stakeholder engagement log indicates that consultations were held with a broad range of stakeholders for a variety of reasons, some of which relate to general information and discussion about the CIS Scheme and Child Link, and others that relate to specific aspects of the program, which may include data and workflow issues, relationships with other reforms, development of the Regulatory Impact Statement (RIS), and potential implementation issues.

The VCIS team has also undertaken research to test community perceptions about Child Link, and a literature review is currently being conducted to understand implementation and change management barriers and opportunities in similar programs and/or projects and how these were managed. Where relevant, learnings will be applied to Child Link.

A stakeholder engagement plan aligned to the first two phases of the Child Link implementation program indicates that the VCIS team has tailored, and will continue to tailor, their stakeholder engagement processes over time. The plan covers the information needs (whether to inform stakeholders of developments or requiring stakeholder input to inform the program) that are required during these phases.

Stakeholder engagement as part of Proof of Concept

The PoC phase of the program examined in detail the data that is required for Child Link, including examining issues of data quality, comparability and compatibility. As part of the PoC phase, workshops and interviews were held with various Subject Matter Experts (SMEs) who were responsible for 12 source data systems across four organisations:

- Department of Education and Training
- Department of Health and Human Services
- Victorian Registration and Qualifications Authority
- Victorian Curriculum and Assessment Authority.

The stakeholder engagement with source data SMEs provides confidence that the PoC phase has engaged with the appropriate stakeholders with the specific purpose of obtaining a deep understanding of the source data, any issues and limitations with the data, and the business rules surrounding the generation of this data.

Stakeholder engagement as part of development of the Regulatory Impact Statement

The development of the RIS was undertaken to estimate the likely costs of various regulatory options for prescribing workforces for Phase 2. Stakeholder engagement as part of this process provided valuable inputs into the development of a clear economic rationale to government to decide how workforces would be prescribed in Phase 2 of the CIS Scheme. The RIS also provides insight into the likely economic impact within each of the key workforces, which takes account of the resourcing burdens as a result of implementing the CIS Scheme and Child Link.

Specific products developed for stakeholder engagement

Several products have been developed by the VCIS team to assist in stakeholder engagement. These are typically one or two-page summaries of various issues that are of interest to stakeholders with information presented in a readily accessible format.

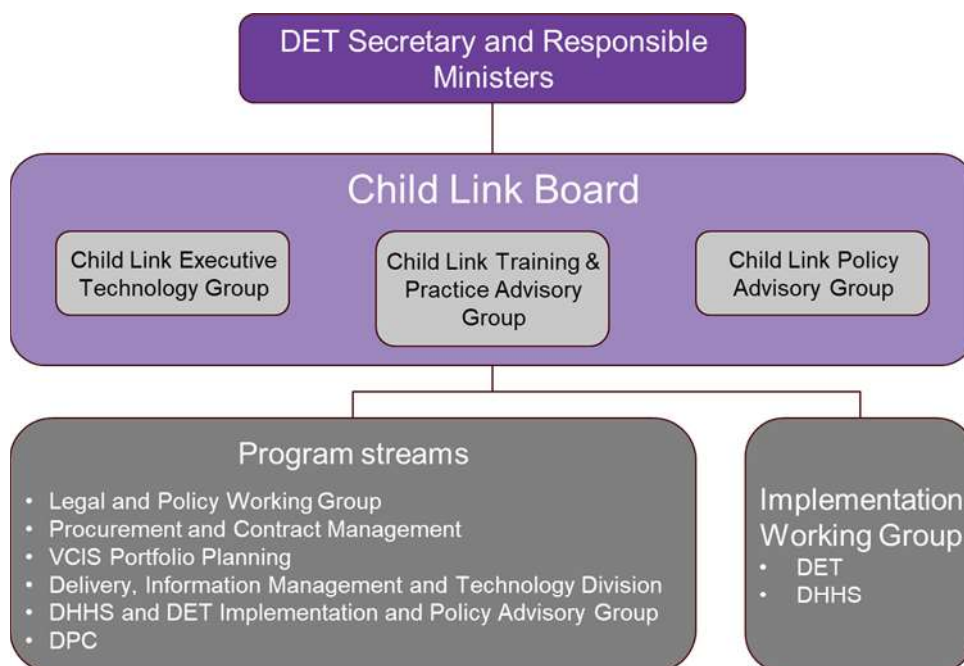
2.1.2 Business

Governance and oversight

Governance and oversight of the Child Link program occurs primarily through the Child Link Board, which is chaired by DET. The Board comprises representatives from DET, the Department of Health and Human Services³ (DHHS), the Department of Premier and Cabinet (DPC), the Department of Treasury and Finance, and also includes an independent expert. Board meetings were generally held monthly. A quarterly progress report that addresses all milestones is prepared for the Board.

An overview of the Child Link governance arrangements is provided in **Figure 2.1**.

Figure 2.1 Overview of Child Link governance arrangements



Source: ACIL Allen 2021 based on Department of Education and Training documents and stakeholder feedback

Stakeholders consulted indicated that the governance and oversight arrangements have worked extremely well. Reasons provided included:

³ The Department of Health and Human Services has undergone a machinery of government process in February 2021 and has been separated into the Department of Health and the Department of Families, Fairness and Housing (DFFH). The Child Protection function, which is most closely linked to Child Link, now resides in the DFFH.

- the breadth of the skills brought by the different members of the Child Link Board. The Board members provide a mix of skills that address aspects of both policy and strategy, as well as technology and data. This ensures that the Board has the expertise to address the different components involved in development of the program and that the interrelationships between these components can be properly considered
- the ability for the program to progress in a systematic way facilitating effective Board oversight, such as through questions arising from presentations to the Board, testing the information that they are being presented with, as well as through opportunities for the membership to explore any issues or concerns further with staff who are directly responsible for particular outputs
- the different program streams that have ensured the Child Link program was well supported by, and linked into, other relevant areas within the Department, such as its technological infrastructure and the legal, procurement and contract management areas.

On the whole, the governance and oversight mechanisms were perceived by stakeholders as comprehensive and robust, which has translated into strong outcomes.

Organisational structure

Another area of the business that was raised by stakeholders as a strong enabler of program success thus far has been the structure of the VCIS team. The VCIS team has been set up by the Department to deliver the implementation of the CIS Scheme and Child Link, with two dedicated executives (an Executive Director and a Chief Technology Officer), that are well supported by other relevant areas of the Department.

This organisational structure brings both a focus to the reforms as well as optimising the linkages between the information sharing initiatives. The structure has facilitated the appointment of staff with unique skill sets that might not otherwise be available internally, such as visual designers and graphic designers, and are viewed as enablers of the program.

Business processes related to Child Link

As part of the PoC phase, a technical prototype stage was conducted to create child profiles from five of the primary source data systems. The prototype developed achieved the primary objective to create child profiles that met the requirements of the legislation and provided the information required in Division 2 of Section 46 of the Act. This process has also served to build confidence about the feasibility of building the Register as intended and ensured a clearer understanding on the part of data contributors about the requirements and operation of the Register.

In addition, following completion of the PoC Phase, new data exchange agreements that include the remaining phases of implementation are being put in place and will be able to meet the needs of Child Link on an ongoing basis.

2.1.3 System

Supporting workforces to use the system

The VCIS team has sought to understand how workforces might potentially use Child Link through the User Journey Mapping exercise. These user journey maps provide a strong understanding of current practice of information sharing among different workforces and consider how these practices are likely to change when Child Link is available. The mapping also considers how, given each workforce's unique operating environment and constraints, different workforces can be supported through the implementation of Child Link to ensure strong uptake and that Child Link is used to enhance their service provision in accordance with the legislative and policy intent of Child Link.

The User Journey Mapping has identified a range of themes and insights that are common across all the workforces, as well as how each workforce experiences issues and challenges in the information sharing process. This assists the VCIS team to understand how different workforces can be best supported to utilise Child Link during the subsequent implementation and scaling as part of the Refinement phase of the program.

System capacity

The scalability of the technological solution for Child Link has been a key consideration in its development, particularly through the technical prototype stage of the PoC phase. The following requirement was referenced in the PoC Phase Closure Report, as a specific consideration for assessment of the technical prototype:

In addition, as the number and nature of the prescribed entities may change over the life of the Child Link system, the system must permit rapid expansion without requiring costly and time intensive, manual upgrades. As such, the ability of the prototype system to address the following must be taken into consideration:

- *sustainability and resilience in the face of change*
- *enable changes to be actioned with minimal coding and/or configuration*
- *accommodate any future expansion or changes in scope in a timely and cost-effective manner.*

The phased nature of the implementation of the program also ensures that the proposed system is tested and adjusted as necessary over time, with a small number of users in the initial phases and ensuring that the system is able to handle the user load before scaling up.

At the time of the Review, a data exchange agreement between DET and the owners of the source data for Child Link had been developed and agreements were in the process of being signed. The agreement includes conditions relating to the timely secure transfer of information that will enable Child Link to function effectively. This includes ensuring source data systems have the capability and capacity to provide regular updates of information every 24 hours in existing Child Link profiles and triggering the creation of new profiles where appropriate. The agreement covers the immediate phases of Child Link implementation and has been crafted in such a manner that it can be easily extended when there is a need to do so.

2.2 Discussion and overall assessment

Overall, there is strong evidence to suggest that the program's design and implementation to date have been effective in ensuring that Child Link is able to deliver the legislative intent of Part 7A of the *Child Wellbeing and Safety Act 2005*. Of particular note is the phased approach to the implementation and the strong platform for going forward provided by the PoC phase, which has been well received by all stakeholders. It has provided confidence to the VCIS team that the data required for Child Link is available and of sufficient quality to be used, and that there are suitable technological platforms to manage the creation of child profiles from different data sources.

Among the key areas related to implementation design highlighted as part of the review framework, the document review and stakeholder consultations indicate that these issues have been addressed comprehensively. There is no evidence to suggest that any key areas have not been sufficiently addressed, or that there are risks that have not been identified and mitigated.

2.3 Areas for future consideration

A technological solution will be in place to test the timely and secure transfer of information from source data systems to Child Link. However, it will be important also to building confidence among Child Link users for data contributors to monitor the timeliness and completeness of their data input. Similarly, training of Child Link users should reinforce the way in which professional judgement will be required to balance the various sources of information available about a child and their family to ensure that appropriate weight is given to information accessed through Child Link.

Policy planning in support of Child Link program implementation

3

This chapter discusses the Review's findings in relation to **Key Review Question 2: Does the policy planning in support of implementation and ongoing operation and monitoring of Child Link, support the legislative and policy intent of Part 7A of the Act?**

3.1 Overall policy planning in support of the Child Link Program to date

The policy planning in support of the implementation and ongoing operation of Child Link has been applied to a broad range of areas. The policy work for this project continues from the work that was done to develop the legislation and to support its passage through parliament. In relation to the timeframe of this Review, the policy developed has continued to show strong connection and alignment to the legislative intent of Child Link. The policy development to date has encompassed a wide variety of components necessary to bring Child Link into existence, with policies spanning people (user practice and user guidance), business (operational policies, external and internal enablers) and system (policies supporting system development).

Stakeholder engagement

Evidence collected for this Review indicated that the VCIS team has effectively engaged with stakeholders and users described in Division 4 of Section 46 of the Act in policy planning to support implementation and ongoing operation and monitoring of the Child Link program. A comprehensive stakeholder engagement strategy has been designed aligned to the phases of the program and able to provide ongoing input to policy planning and refinement. The strategy identifies key stakeholders at different stages, detailed plans for the engagement and communication with these stakeholder groups, appropriate methods and timing of engagement, as well as likely stakeholder concerns and proposed strategies to address these concerns.

The overall stakeholder engagement strategy is supplemented by several other work streams, such as findings from the Two-Year Review of the CIS Scheme and a literature review that is currently in progress of schemes similar to Child Link both within Australia and internationally. In addition, there has been extensive cross-agency engagement with other government departments, particularly those departments who are likely to use the Child Link system and fund organisations to deliver services that have authorised users of Child Link.

The extensive stakeholder engagement conducted by the VCIS team is designed to ensure that the development of policy for Child Link implementation adequately considers the perspectives of all stakeholders and users. Timely engagement has been shown to assist with the early identification of issues and concerns, which in turn ensures policy planning for Child Link adequately addresses these issues and concerns. This capacity for informed policy planning is likely to promote the increased usage of Child Link and to increase the likelihood that Child Link is used appropriately.

Stakeholder support

The policy planning undertaken by the VCIS team clearly seeks to provide policy and operational guidance to support the stakeholders and users described in Division 4 of Section 46 of the Act, in accordance with Division 5 of Section 46 of the Act. The implementation of the Child Link policy and guidance will be guided by the development of the Secretary's Guidelines and associated policies, processes and practice guidance. The Secretary's Guidelines will relate to the matters contained within the legislation, including the roles, responsibilities and expectations of Child Link users and will be a companion piece to the Ministerial Guidelines developed to support ISEs under the CIS Scheme. The Child Link policy and guidance material will provide direction to prescribed users for the safe and appropriate use of the Register.

Policies, processes and frameworks will be developed to guide both the operations of Child Link and to inform professional practice in relation to the use of Child Link, varying from explaining appropriate information management and privacy requirements, through to the process for verifying and maintaining appropriate Child Link access permissions. Policy planning has also informed the development of the pilot strategy for the Initial User Launch. The Launch will support the onboarding of users in a targeted and supported way, informed by extensive stakeholder engagement and mapping, including the User Journey Mapping project.

Policy planning and operational guidance will contribute to the legislative intent of Child Link by providing stakeholders and users with sufficient operational support when the Child Link program is implemented and scaled up, which will ultimately support the smooth and quick uptake by users.

Change management strategies

Policy planning has included consideration of change management strategies for the stakeholders described in Division 4 of Section 46 of the Act.

A Child Link Change Strategy (including the Change Framework and Child Link Training Strategy) has been developed and provides the approach and vision to managing change across the Child Link program lifecycle. The Child Link Change Strategy outlines detailed change plans, change impact assessments, and change activities (e.g. training curriculum, change champions, support services), and change metrics to establish a baseline across the change and program phases.

One notable initiative outlined in the Child Link Change Strategy is the use of 'change champions'. These change champions assist with implementing the Child Link program by being the first point of contact within an organisation and/or service sector in engaging their stakeholders, providing informal support and feedback and reinforcing training. This is an important initiative that reinforces findings from the Two-Year Review of the CIS Scheme, where the presence of such change champions was found to be a strong enabler in implementation of the CIS Scheme within an organisation.

Overall, the change management policy for Child Link employs a structured, purposeful approach to encourage and support internal and external stakeholders to engage, embrace, adopt and use the Child Link Register. The implementation of Child Link will be accompanied by policy and training. This will be delivered through activities and artefacts that are intended to effectively communicate the purpose and benefits of Child Link for users, services and government; the roles and responsibilities of Child Link users; reasons for adopting Child Link into professional practice; reasons for advocating for the uptake of Child Link in an organisation; the ways Child Link helps enable better and more efficient information sharing; and how and when Child Link can be used. This will ensure that stakeholders and users who engage with Child Link are supported through the complete process of its implementation and ensures a high degree of uptake.

Monitoring progress

Several policy documents are being developed to track the ongoing monitoring of implementation, activities and outcomes of the child information sharing reforms. These include the Monitoring and Reporting Framework (MRF) and Outcomes Measurement Framework (OMF). The MRF will describe what data sets will be used to measure performance against OMF measures and targets, how they will be collected and reported, how frequently they will be collected and reported, and by whom and where they will be reported. The data collected as part of the MRF will be informed by the intended outcomes and outputs validated in the OMF. The OMF is based on current CIS Scheme and Child Link program logic models which outline the inputs, activities, outputs and outcomes of the reforms.

The utilisation of stakeholders and intended users of Child Link to monitor implementation progress aims to promote continual improvement of the Child Link program. The ongoing monitoring of implementation, activity and outcomes of the reforms ensures an ability for timely assessment of, and response to any risks and issues, and provides an evidence base for determining how to best invest resources in the effective operation of the initiative. Using the workforce to understand implementation progress on the ground will be pivotal in enhancing Child Link for its intended purpose.

Collection, storage and retrieval of data, and the disclosure of information

In relation to the data items contained in Child Link, stakeholders have reviewed agreements on data transfer and the Child Link Board members have been active in the negotiation and finalisation of Data Transfer Agreements, with some of these agreements awaiting formal endorsement. Significant consultation has been undertaken to finalise agreements, including addressing formal feedback. The Child Link Board has overseen the completion of this milestone, given that access to production data is on the critical path of the Child Link program. The disclosure of information within the workforce is also being considered, in concert with the CIS Scheme. For instance, the CIS Scheme includes a number of safeguards to promote the responsible, safe and appropriate sharing of information, including record-keeping obligations, and offences for unauthorised disclosure.

The policy planning surrounding the collection, storage, retrieval, and disclosure of the Child Link data aims to ensure that sensitive data is managed effectively and securely.

Involvement of leaders within business units

The policy planning has involved various leaders within business units, including DHHS, who will support policy implementation. Moreover, the four interrelated target audiences relevant to Child Link implementation, namely Child Link users, ISEs, government agencies supporting Child Link and DET, are discussed in the Child Link Change Strategy and Change Framework. The involvement of appropriate leaders within business units will help efficiently drive the authorisation and implementation plans within individual organisations contributing to Child Link.

Strong engagement of business units within DHHS and DET during the current pilot and following early implementation phases of the program will be critical in translating Child Link policy into practice as it will be experienced by the different workforces and workplaces.

Policy planning considers and accounts for the broader policies around technological platforms, such as information security and privacy

The policy planning developed by the VCIS team has effectively considered the broader policies around technology platforms, such as information security and privacy.

The Child Link system is being developed with privacy and related security protections built into the design, in accordance with protections that are outlined in the legislation in relation to the prescription of its use by prescribed organisations and penalties for misuse. The Office of the Victorian Information Commission and DPC's Chief Security Officer are regularly consulted on best practice and security by design.

The data is classified as protected and will align to the required security standards (e.g. whole-of-Victorian Government (WoVG) standards/settings to ensure appropriate data security). Access to the Child Link system is restricted to only required staff. All staff working on Child Link are required to have a current employer Working with Children Check. Auditable access controls including usage patterns, data disclosure controls and policy/regulations for access to data within Child Link will be maintained.

The user authorisation policy will require a responsible officer from each prescribed service to nominate the required users, and each user will require specific training on the obligations associated with the use of the system to be logged before authorising an account.

3.2 Discussion and overall assessment

Overall, there is strong evidence from the document review and stakeholder consultations to suggest that the policy planning to date is on track to being effective in ensuring that the Child Link program supports the legislative and policy intent of Part 7A of the *Child Wellbeing and Safety Act 2005*.

The overarching policy framework indicates that the planned policy development is sufficiently comprehensive to cover a broad range of issues, including addressing the policy needs of people, business and system. It also flows from and demonstrates clear links to various sections of the legislation, which promotes a strong alignment between legislation and policy.

The approach taken by the VCIS team in policy planning, including development of an overarching policy framework for Child Link, and broad and ongoing stakeholder engagement, has helped to provide confidence that key areas of policy planning have been identified and are progressively being addressed.

While the intention of the implementation program was to progress both the technological solution and the policy and strategy work in parallel, there was a view that a greater focus was needed on aspects of policy development to ensure a successful uptake of the initiative. It is noted that the COVID-19 pandemic was considered to have had an impact on policy development and that this work is now being expedited.

Policy planning related to change management has been informed also by findings from the Two-Year Review of the CIS Scheme. It is likely that, particularly in the area of change management, further integration between change management for Child Link and the CIS Scheme would be beneficial. This will help Child Link users better understand the linkage between the CIS Scheme and Child Link and is a matter that could be further explored through the Child Link Board.

3.3 Areas for future consideration

There is significant work to be undertaken in a tight timeframe to meet the legislative go-live date in December 2021. The VCIS team is aware of the challenges ahead and has made sufficient plans to ensure they are able to meet these deadlines. The VCIS team has noted that they are on track and has mitigated some of the risks identified in the early stages.

The VCIS team should consider opportunities for further integration of practice change between the CIS Scheme and Child Link, in order to reinforce the respective contributions of these reforms to enabling improved information sharing and acting earlier to improve child wellbeing and safety outcomes.

Potential for adverse impacts

4

This chapter discusses the Review's findings in relation to **Key Review Question 3: Is the design of the Child Link implementation program, its implementation to date and the policy planning in support of Child Link likely to have any adverse impacts?**

4.1 Approach to adverse impact identification and mitigation

For the purposes of this Review, adverse impacts are defined as negative outcomes that may eventuate even with the successful implementation of Child Link. While there will be negative outcomes if Child Link is not successfully implemented, these are discussed as risks rather than adverse impacts. Risks are defined as issues or factors that affect the likelihood of successful implementation of Child Link.

Risk management

The project stream leads are responsible for coordinating risk management activities. These activities include identifying, managing and escalating risks and issues. Risks assessed as high are escalated to the accountable manager and the VCIS Risk Register. All team members working on Child Link in each stream have a role in contributing to risk identification, mitigation and management. The VCIS team has a Child Link Risk Management Strategy, and as CIS Scheme and Child Link are WoVG reforms, the program also considers the Victorian Government Risk Framework, which helps determine how well the existing controls are managing the risk.

The VCIS team maintains an active Child Link Risk Register, which details risks and mitigation strategies. The Child Link Risk Register is presented to the Child Link Board monthly. Specifically, the Risk Register details information on the type of risk, description of the risk, existing controls in place and their effectiveness, likelihood and consequence of occurring, current risk rating, risk response and treatment(s) to be implemented, implementation status, treatment due date, and post-treatment likelihood, consequence and risk rating. During the Pilot Phase, the Child Link Solution Development Portfolio Plan is regularly updated to indicate any delays to planned activities.

Processes have been established to align policy development with the development of technical requirements. Where this was not possible due to resourcing and competing priorities, a policy issues register has been created, which is updated weekly and any risks or issues escalated. The resourcing of two lawyers in the Department's Legal Division specialising in government administration law, including weekly updates, and regular executive oversight from Legal Division further strengthens risk mitigation.

Anticipation of potential adverse impacts

Given that Child Link has not yet reached the end of the production phase, where the Child Link Register is operational, it is not possible to identify actual adverse impacts from the implementation of Child Link. The following consideration of potential adverse impacts draws from stakeholder experience of implementing similar programs.

A number of stakeholders indicated that the risk of adverse impacts from the program has been reduced through the significant engagement with stakeholders. By engaging with stakeholders and users extensively, an intense effort has been made to understand their operational and situational contexts to identify potential barriers to uptake, such as Child Link not being tailored to workforce needs.

The User Journey Mapping exercise uncovered a number of potential adverse impacts, which reflect some of the unexpected outcomes that were found through the Two-Year Review of the CIS Scheme. There were concerns that, as with the CIS Scheme, a formalised process of information sharing could erode existing relationships, and that information sharing could have adverse impacts particularly in small rural communities. Conversely, for others, a centralised and formal

process for information sharing was preferred as information was more likely to be shared appropriately, with sufficient oversight and improved accuracy.

At the governance level, the breadth of member experience and expertise was cited as a protective factor against adverse impacts. The inclusion of Board members who provide a wide range of perspectives was seen as a way to effectively identify different risks and potential adverse impacts.

Another way in which risks have been mitigated is through the phased approach to the program, which ensures that there are adequate opportunities to identify potential adverse impacts throughout the program, and to remedy these adverse impacts before the next phase of the program. Possible adverse impacts identified in consultations with users and stakeholders also included: the potential misinterpretation of information or inability to appropriately contextualise information; and the extent of the work that might be generated in requests for follow up information following review of a child profile. A phased approach ensures that the data and the system are tested for issues before the system is rolled out. The initial rollout is also focused on a very small number of users to provide the opportunity for adverse impacts to be identified and remedied before broader rollout.

4.2 Discussion and overall assessment

The document review and stakeholder consultations highlighted several areas of the implementation program or policy development that are risks and potential adverse impacts from the implementation of Child Link. These risks and adverse impacts have been documented and significant work has gone into the development of mitigation strategies.

A key enabler for minimising risks and potential adverse impacts is the regular review of identified risks by various governance groups. The senior leadership in these governance groups and advisory groups from multiple government agencies has been a key driver in identifying risks early and developing mitigation strategies. The VCIS team highlighted that the governance groups are proactive and accountable and provide adequate support, and expressed that having a single governing body with senior members across agencies has been an essential enabler for efficient decision-making. For instance, the WoVG Child Link Board meets monthly and reports through to the WoVG Children's Services Coordination Board, underpinned by several Working Groups and Committees, which have been established to ensure a shared understanding of progress and challenges.

In addition, the phased approach to implementation and extensive stakeholder engagement with different workforces and sectors were identified as key protective factors against potential adverse impacts. These strategies allow any potential problems to be identified while the implementation is at a testing phase or where there are limited users, allowing for any adverse impacts to be identified and rectified before further rollout of Child Link.

4.3 Areas for future consideration

The VCIS team has comprehensively considered aspects of the Child Link implementation program and identified a range of potential risks and adverse impacts. These have been documented and mitigation strategies have been provided to minimise these risks and impacts. The VCIS team maintains an active Risk Register, which is consistent with the Child Link Risk Management Strategy. Subsequent risk workshops will need to occur in order to capture the risks associated with future phases.

One potential area for consideration for the program would be to differentiate between risks and potential adverse impacts. While there are a small number of issues that may fall under both categories, risks and potential adverse impacts are fundamentally different in that the VCIS team is less likely to be able to identify potential adverse impacts. While the VCIS team is better placed to identify and manage risks proactively, adverse impacts will require prompt identification and remedial action, particularly once Child Link reaches the live phase in December 2021. The Child Link Board could consider actively monitoring for adverse impacts through governance activities and stakeholder feedback mechanisms throughout 2022 and beyond.

Review findings and recommendations

5

This chapter provides a summary of the findings from the Review, concluding comments and recommendations to inform the continuing development of the Child Link program.

5.1 Summary of Review findings

The purpose of the Child Link Register is to contribute to improved child wellbeing and safety outcomes by enabling monitoring of, and support for, participation in government-funded programs and services by children born or resident in Victoria. Specifically, Child Link will assist organisations prescribed under the CIS Scheme by providing authorised users access to information that will enable service providers to make more informed decisions, better identify needs and collaborate with other professionals working with the child and their family. Child Link will be an online tool with data inputs from existing information sources that establish and maintain the Register to meet the requirements of the legislation in relation to particulars of the child, services they have engaged with and specified information in relation to the prescribed service or program.

Alignment to legislation

The legislation setting out the intended Child Link Register provides specificity about the scope of information to populate the Register and the intended users of the information. The challenge in giving effect to the legislation is in the detail of the design, policy planning and operational guidance for the Child Link Register. Over the first two years of responding to the legislation, a dedicated capability within DET responsible for the child information sharing reforms has systematically worked towards turning the Child Link Register regulatory provisions into practice. This initiative has been undertaken in collaboration with partners in other areas of government, through governance arrangements that bring expertise, coordination and independent scrutiny and by connecting with stakeholders that give confidence about the value of the planned product and its relevance to prospective user groups.

In terms of the policy planning, the overarching Child Link Policy Framework is strongly aligned to the legislation and its intent, paying particular attention to expanding various sections of the legislation and developing policies that are closely aligned with the legislative intent. The Policy Framework is also comprehensive, covering multiple areas including the technological solution, business processes and workflow, as well as stakeholders and users of Child Link.

Design and policy planning implementation

The early engagement in 2019-20 of government data custodians as part of the PoC for Child Link provided a solid basis for collaboration on identifying the completeness and quality of data available to meet the legislated requirements and the ability to develop a child profile. The stakeholder engagement during this process was targeted to identified source systems, provided a deep understanding of the source data and identified any data issues and limitations. The level of consultation provides confidence in the findings of the PoC about the ability to develop and display a child profile. The PoC also provided a strengthened stakeholder understanding of the requirements of the system and the interface of their respective source systems with Child Link.

The development of the Child Link Pilot Strategy underpins the current Pilot Phase which commences the system build and will establish policies and processes to ensure the appropriate use of Child Link.

Both the document review and key informant consultations for this Review provide strong evidence of a comprehensive approach to the design and policy planning for Child Link. This approach has remained focused on delivering the legislated requirements for Child Link but has also provided a transparent process and embraced stakeholder engagement to inform all aspects of the program.

Likelihood of any future adverse impacts

An ongoing risk identification, management and review process forms part of the responsibilities of Child Link program teams within the VCIS team of DET with regular oversight from the Child Link Board. To the extent that future adverse impacts can be known, the Child Link Risk Register is informed by experiences from other projects (such as the CIS Scheme), stakeholder feedback and the legislated requirements for Child Link. The Victorian Government Risk Framework is also considered in assessing how well the existing controls are managing identified risks.

A key risk mitigation strategy is ensuring a breadth of consultations, which, together with the phased and iterative processes for establishment of Child Link, will minimise the likelihood of any adverse impacts.

The Risk Register is augmented by a policy issues register with capacity to escalate risks or issues as appropriate. In addition, regular oversight from DET Legal Division and resourcing of additional capacity in government administration law further assists in mitigating risks.

Possible adverse impacts identified in consultations with users and stakeholders include concerns about the potential for Child Link information to be misinterpreted and the impact of Child Link on resourcing. The VCIS team are aware of these issues, which to some extent can be addressed through training and review processes associated with the initial launch of the Child Link Register. There may also be a role for the Child Link Board in considering the preparedness of organisations to support authorised Child Link users in the effective implementation of the initiative.

5.2 Conclusion

Overall, the review of the available documentation and information from key stakeholders provides evidence that the design, policy planning and implementation of Child Link is on track to deliver the legislative intent of Part 7A of the *Child Wellbeing and Safety Act 2005*. The approach taken to deliver Child Link has been effective in ensuring program risks are minimised, and that all aspects of implementation are thoroughly considered. Several aspects of the implementation of the Child Link program have been identified as strengths and it is recommended that these continue to be supported.

5.3 Recommendations

Recommendation 1: That the governance arrangements for Child Link continue to be supported to provide diverse expertise and flexibility in meeting the changing requirements of the stages of implementation of the Child Link program.

The diversity, depth and breadth of the Child Link Board was found to be a strong enabler for effective planning and implementation of Child Link. The Board has also been sufficiently flexible, establishing subcommittees to deal with specialised issues, such as the Executive Technology Group in the early stages and more recently the Policy Advisory Group. The continued flexibility of, and support for, the Board will be important in remaining responsive to the program needs as it progresses to the next phases.

Recommendation 2: That a detailed review be undertaken once Child Link is embedded and fully operational to assess the extent to which the initiative has met its objectives.

While this Review sought to be as detailed and extensive as possible, it should be noted that the Review has taken place prior to the operationalisation of Child Link. There is a limit to the ability of the Review to understand the impact of Child Link on the day-to-day business among service providers and government agencies, and how Child Link in turn contributes to the anticipated improved outcomes for children and their families.

It is understood that the Department of Education and Training has plans to conduct a five-year review of Child Link. Such a review is supported and would enhance the planned five-year review of the Child Information Sharing Scheme.

Recommendation 3: That the Outcomes Measurement Framework and planned Monitoring and Reporting Framework contribute to assessing the uptake of Child Link once it is operational.

There were a number of concerns raised that, despite the very best efforts to train and support workforces and engage in change management, there could be a reluctance to use Child Link once it becomes operational. This has been identified by the Victorian Child Information Sharing team within the Department of Education and Training and significant efforts have been made to mitigate this risk through the User Strategy and Pilot Strategy. Moving forward, the Victorian Child Information Sharing team should work towards the development of the Monitoring and Reporting Framework by the go-live date, based on the Outcomes Measurement Framework for the child information sharing reforms. Implementation of these tools is strongly supported to provide an evidence base for the effectiveness of the reforms and information to contribute to continuous improvement in information sharing practices.

The collection of data through these frameworks will also improve the information available to the planned five-year review of the reforms.

Recommendation 4: That the Department of Education and Training considers further integration of change management and practice change between the Child Information Sharing Scheme and Child Link.

The Child Information Sharing Scheme and Child Link are linked initiatives under the legislated child information sharing reforms. The reforms share a diverse workforce that provide supports to children and families that may receive services from multiple providers. The Department of Education and Training administers both reforms and this structural arrangement is well placed to enable a strengthened coordination of activities to embed reforms in practice. There are numerous opportunities in the change management approaches (such as training, awareness raising and other activities) to reinforce these links and to help stakeholders and users better understand how the Child Information Sharing Scheme's principles relate to the use of Child Link, and how Child Link enables the intent of the Child Information Sharing Scheme.

Recommendation 5: That the Child Link Board when considering workforce readiness has regard for arrangements in place that support Child Link users and the effective integration of Child Link into current practices.

The preparedness of workplaces to integrate Child Link into current operational practice and the relevant workloads of Child Link users will be crucial in ensuring that Child Link users have the capacity to adopt the use of Child Link effectively once it becomes operational. Through the Child Link Board, the readiness of key workforces should be considered particularly in the lead up to their inclusion as Child Link users in line with the Pilot Strategy. This should include taking account of whether there are any other planned reforms or workforce changes that may influence the preparedness of workforces to implement Child Link in their workplace.

COMMENTS

Child Link Two Year Review Recommendations and Government Response

	Recommendation	Government response
1	That the governance arrangements for Child Link continue to be supported to provide diverse expertise and flexibility in meeting the changing requirements of the stages of implementation of the Child Link program.	<p>Support in full</p> <p>The current governance arrangements for Child Link will continue to be supported to provide the diverse expertise, coordination and flexibility required to remain responsive to the Child Link program as it progresses through the phases of implementation.</p>
2	That a detailed review be undertaken once Child Link is embedded and fully operational to assess the extent to which the initiative has met its objectives.	<p>Support in full</p> <p>The Department of Education and Training will procure an independent five-year review of Child Link to assess if Child Link is effectively contributing to the realisation of the objectives of the Child Information Sharing Reforms, and whether improvements can be made for future performance. This review will augment the legislated five-year review of the Child Information Sharing Scheme.</p>
3	That the Outcomes Measurement Framework and planned Monitoring and Reporting Framework contribute to assessing the uptake of Child Link once it is operational.	<p>Support in full</p> <p>To the extent that data can reasonably be collected, the planned Monitoring and Reporting Framework will be used to understand how Child Link has achieved its objectives. Tracking of Child Link uptake will be performed under this framework and will inform ongoing assessments of the operation of the program.</p>
4	That the Department of Education and Training considers further integration of change management and practice change between the Child Information Sharing Scheme and Child Link.	<p>Support in full</p> <p>The Department of Education and Training will further integrate and coordinate Child Information Sharing Scheme and Child Link change management strategies and approaches, which may include activities such as training, guidance materials and place based activities to reinforce the links between the two interconnected reform elements and to effectively communicate this reform integration across stakeholder groups.</p>
5	That the Child Link Board when considering workforce readiness has regard for arrangements in place that support Child Link users and the effective integration of Child Link into current practices.	<p>Support in full</p> <p>As part of the Child Link pilot strategy, and Child Link implementation plan the Child Link Board will consider readiness of workforces, and staged implementation accordingly to ensure effective implementation of Child Link. The Child Link Board will oversee delivery of guidance materials, training and culture change strategies aimed at enhancing professional readiness that will promote effective integration of Child Link into current practices.</p>

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