



Public Service Association of NSW

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In reply please quote: : GW:jg

20 August 2026

Ms Lauren Dean
Deputy Secretary Child Protection and Permanency
NSW Department of Communities and Justice
6 Parramatta Square
10 Darcy Street
Parramatta NSW 2150

By email: Lauren.Dean@dcj.nsw.gov.au and
DeputySecretaryCPP@dcj.nsw.gov.au

Dear Ms Dean,

The Public Service Association (PSA) seeks to provide the following feedback and questions regarding the Phase 3 Restructure currently open for consultation.

As part of the Associations feedback, we are seeking further information and request that an additional two weeks for consultation upon receipt of the information to provide any further comment, questions, or concerns.

The PSA is aware of the need to reform Child Protection and Permanency, and considering various reviews over the past few years, we support changes that will improve outcomes for children and young people while supporting the incredible staff doing the work.

Child Protection Workers in the NSW Public Sector walk the front line to support and advocate for some of the most vulnerable people, working tirelessly and often above and beyond, because they care. ,

A key issue that has impacted Child Protection in NSW for many years, and a reason for the Child Protection Award 2025, is a lack of staffing and resources. With vacancies within CPP sitting as high as 12% as reported within the September 2023 DCJ Dashboard and further some Districts as high as 23%, noting that this excluded staff on workers compensation.

We are unsure how *Phase 3* intends to improve retention or increase staffing and resourcing, particularly support provided to Caseworkers, Carers and other stakeholders.

It is positive to hear that there will be no reduction in funded positions. However, we are aware of the impact this will have on '*unfunded roles and positions*' and the staff who are currently in these roles.

The PSA is advised that some staff report being that they have been acting or temporary roles for significant periods of time. Honest, clear and transparent communication around the impact this will have needs to be included in the final Change Management Plan and associated documents and communication to staff.

Many members from various roles have raised the lack of clarity as they are unsure if they will return to their substantive roles or be considered for the roles they have been in, or where they have been acting or on TAA for up to 7 years.

Further to the above, a substantial collective concern raised by many members in various teams and units is the realignment of their roles into '*front line Child Protection*'.

Many members applied for roles with the understanding that the work they would be performing was away from front-line and into more specialised areas and skill sets.

Other members report never having performed direct Child Protection or Permanency work or not having been on the front line for many years.

While they may have been employed on *Child Protection Caseworker* RD's, the recruitment process and practices, along with the advertisements for the roles, implied differently.

For example, *Cultural Consultants* working in various Cultural teams were recruited to provide cultural knowledge and expertise. The recruitment process did not raise or discuss the potential of front-line Child Protection work. In this particular situation, allocating cases to these staff can have a significant impact on their social and cultural standings.

Other examples are Court Liaison Officers (CLO), Child and Family District Unit (CFDU), Child Story, Carer Support and the recruitment processes for most of these roles was such that applicants believed they were no longer a *Child Protection Caseworker*.

Members report applying for these, and other similar roles and teams, as a way of professional development and to move away from the demanding work of Child Protection and Permanency. They were led to believe that these roles are different to Child Protection Casework, often not being called or referred to as Caseworkers. Being forced back into Casework will have significant impacts, sometimes leading to staff leaving DCJ to find alternate work.

Many of these roles and teams provide specific functions and support to front line Caseworkers. In many of the Town Hall meetings, the Department has stated it needs feedback through the consultation process on the functions of the teams and how they contribute to Child Protection.

It is the position of the PSA that the Department should have an appropriate understanding of the functions provided prior to proposed changes. Gathering the information in '*consultation*' raises concerns about the efforts and research the Department has undertaken prior to putting forward its proposed design.

Further, it demonstrates that the Department does not understand the significant risk as to the impacts these changes will have as we have not been provided with any risk assessment.

Once these roles and teams are established in any new structure, is the intention of the Department to look at its practices in recruitment for non-front line roles currently performed by '*Caseworkers*' and, where appropriate, create specific role descriptions to provide stability and clarity for long term professional development.

To assist with some of the above concerns, the PSA seeks;

- Current organisational charts with FTE numbers included. For example, Child and Family District Unit, Child Story Team/s, High Cost Emergency Arrangements Strategy Unit, etc.
- Copies of each of the current and proposed future Role Descriptions referred to in the Job Pool document.
 - o We note that many of the '*proposed associated future role RD's*' are repeated but replace current specialised RD's
- The Full administrative and business support review. This was part of the MOU for the Child Protection Award 2025 and to be done in consultation with the PSA by 31 June 2025.
 - o As DCJ has advised, admin roles are a shared resource with Homes NSW, when will Homes NSW be included in consultation.
- Clear identification of who is, and has been, in the '*Design Team*' from Phase one to Phase 3, and what work has been done to date regarding planning and information gathering
- Details on potential future changes being considered by the Department for either Phase 4 or other restructure activities.

Some further, and more specific concerns that need to be addressed;

- The limit of 400 words for feedback. Members are reporting this restricts their ability to provide genuine and meaningful consultation feedback and request this be increased, or no limit applied.
- How will DCJ manage the impact on staff who have been acting in roles, or on long term secondments?
- Will they be considered for placement in the acting roles or secondments if they have been in them for a period of time? (I.e. more than 12 months acting/seconded).
- How will DCJ manage the impact to business with the impact of reducing unfunded roles?
- How will DCJ manage the impact of redistributed workload with the proposed reduction/redistribution in various roles and teams? (I.e. ChildStory, Carer Support, CFDU, Admin, etc)
- Are there expected location moves for staff who are reassigned or moved teams? Throughout the Town Halls and communications, statements have been made that there will be no geographical movement of staff. However, members are concerned that if they are reassigned, they may be moved CSC's or offices.
- What steps will DCJ take to support and protect Aboriginal staff who may be reassigned to front line casework and required to perform Child Protection or Permanency work within Community?
- How does the proposed reduction in Carer Support roles align with the Ministers' focus and advocacy for Carers?
- If the Department seeks to increase its Carers, how will they be appropriately supported with a reduction in resources?
- When will recruitment for vacant Leading Caseworker Roles begin?

Finally, as the Department is seeking information and feedback on functions and staffing levels of roles/teams in order to have greater understanding of the proposed restructure, we believe a further period of consultation should be provided once the feedback has been reviewed and greater detail can be provided, which includes an extended period of consultation.

If you require any further information, please contact PSA Industrial Officer Graydon Welsh on 0409 741 071, or via email gwelsh@psa.asn.au.

Your sincerely



Graydon Welsh
Industrial Officer

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