



RESPONSE TO THE MCFD GOOD PRACTICE ACTION PLAN

INTRODUCTION

The BC Association of Social Workers (BCASW) is celebrating more than fifty years as the voice of professional Social Work in British Columbia. In addition to its mandate to support and strengthen the profession of Social Work, the Association engages in ongoing advocacy for progressive social policies and practices.

The BCASW response to the *MCFD Good Practice Action Plan* (hereinafter referred to as 'the *Plan*') is a compilation of practice and policy analysis from Association members. It includes province-wide input from social workers practicing in rural and urban centers and in First Nations, urban aboriginal and MCFD mainstream aboriginal settings. Additional insights were provided by academics from the province's schools of Social Work and gathered from published responses to the *MCFD Plan*.

Our intention is to share the academic and practice wisdom of BCASW members with the Ministry of Children and Family Development. BCASW is committed to bringing the Association's expertise to all child welfare consultations and discussions. We are dedicated to supporting government when policy is clearly in the best interest of children and families, warning government when policy or practice directions may produce unintended consequences or harm, and noting when policy fails to adequately address the concerns of British Columbian families.

FINDINGS

BCASW supports the general direction outlined in the *Plan*. Its emphasis on the Family Preservation Model, case practice focused on building family strengths, an emphasis on early integrated prevention services, the review of the impact of MEIA policies and the devolution of services to a regional authority are positive

developments in the delivery of child welfare services. In some ways the *Plan* can be read as evidence of MCFD moving in some long overdue and very positive directions, such as:

- An initiative toward real change for First Nations ‘on reserve’ communities and families
- The beginning of work with other ministries such as MEIA on income assistance rates and the lack of social housing, in an effort to alleviate some of the child welfare problems they cause
- A move away from narrowly prioritizing the ‘best interests of the child’ at the exclusion of supports for families
- A tangible commitment to youth in care that extends beyond the age of majority
- A commitment to provide a continuum of available and accessible integrated services to children, youth and families
- A commitment to adequate salaries, training and support for social workers in the mainstream MCFD system

However, the *Plan* is unfortunately one that is short on specific commitments and long on general statements, rendering it difficult to evaluate and critique. It is difficult to have faith in this document as evidence of substantive change due to:

- The absence of specific and concrete commitments
- Inadequate consultations with First Nations and urban aboriginal agencies.
- The over reliance on the Family Preservation model to ensure child safety

Further, given MCFD’s past history, the discourse of building community strength and capacity coupled with repeated references to a ‘bottom up’ structure can easily be read as the government’s code for downloading and devolving responsibility without the required accompanying resources.

CONSULTATION

BCASW was never formally invited into the consultation process, and as a result significant practice and academic wisdom was lost from the process. Social Work professionals who did attend various consultations reported that for the most part the ‘transformation’ meetings consisted of being given information by MCFD representatives, with little opportunity to provide any analysis of the current Ministry direction. BCASW looks forward to being invited to participate in future consultations regarding the *Plan*.

TRANSFORMATION

The Practice Plan initially acknowledges current good practice in the field of child welfare practice, as one would expect from a document authored by the Ministry of Children and Family Development. BCASW also acknowledges the high level of professional Social Work practice in the child welfare ministry. Unfortunately the document goes on to indicate the author’s vision of wholesale practice changes, stating “when the transformation involves barriers, problems or gaps in the structure and functioning of MCFD, practice, policy,

and or the system as a whole, the work is about substantial change and not tweaking what exists” (p.6). The author’s relish for substantial change does not coincide with the professional assessment of social workers and community support agencies who have continually noted that sufficient resources for child welfare services and the ongoing focus on strengthening families, not extensive change and organizational chaos, would greatly increase the safety of BC’s ‘at risk’ children.

QUESTIONABLE TRANSFORMATION ASSUMPTIONS

Parts of the *Plan* are based on assumptions that are not shared by many social workers involved in the delivery of child welfare services:

- The *Plan* assumes that extreme interventions such as ‘removing’ children are common practice (p.9) in the BC child welfare system. The number of removals did spike after the mid-nineties *Gove Report* but then diminished over time. Best practice child welfare Social Work has long acknowledged that children are best served in their families. The *Plan’s* authors appear to be creating a false benefit by saying fewer children will be removed from their families, ascribing a benefit that is already in place to the *Plan’s* focus on strength based practice. It should be noted that while Risk Assessment has been documented via various Ministry documents, family strengths have remained central to the assessments offered by professional social workers.
- The *Plan* declares that children, youth and families will be “recognized as a resource rather than people needing help” (p.9). The *Plan* intimates this is a new way of practice that social workers will need to adopt. Professional social workers have a longstanding history of recognizing both family strength and family need. Again the authors of the *Plan* seem to be creating a false problem and then indicating the *Plan’s* new way of practice has the solution for it.
- The Transformation assumption that current child welfare practice is solely focused on child protection matters (p.10) flies in the face of evidence that clearly shows MCFD investing millions of dollars in new and innovative community based family support services. Practicing social workers also confirm that the Ministry has been creative in financially supporting a wide range of services for families. Many social workers have noted that the problem is not the Ministry’s focus but the lack of sufficient resources.
- Silos of Service: The *Plan* assumes there are widespread pockets in the Ministry where services continue to be delivered in a fractured silo fashion (p.10). This assumption is inaccurate, as organizational changes occurred based on Judge Gove’s recommendations regarding inter-disciplinary child welfare service delivery. The changes to silo delivery of services occurred post 1996 and practicing social workers already see child welfare, mental health and probation services as components of one Ministry. It seems the *Plan’s* authors have again created a way in which the new

Plan can be guaranteed success, given that inter-disciplinary practice is well enshrined within the organization. It also seems that this assumption magnifies the behavior of some local factions in the Ministry who may have been allowed to function outside the “normal” scope of organizational behavior.

FOCUS AND VISION

The *Plan* focus on strengthening families will assist many at risk families to remain together. Practice under the *Plan* will likely combine the families’ strengths with family support services to reduce the risk of harm to at risk children. A child welfare system in which family preservation practice is highlighted and resourced is well supported in the Social Work community.

Unfortunately the *Plan* appears to be almost entirely organized around the Family Preservation Model. It does not contain clear language that promotes the protection of children; instead, it seems to over rely on language that addresses meeting the developmental needs of children and the strengthening of families. We question if the authors may be over confident when they state, “vulnerability can be prevented through the strengthening of communities and families, both economically and socially and that is a core priority” (p.7).

The document makes only vague reference to initiating this plan within the current mandate of the Ministry. Victim centered language that acknowledges the child as the primary client, who is best served if possible in the family, (see the CF&CS Act) is not articulated and the absence of victim centered language such as child abuse, and neglect in the document represents an extreme policy/practice shift within MCFD. The *Plan* does not adequately speak to the Ministry’s legal mandate to protect children who are victims of sexual and physical abuse as well as neglect. In other sections the authors appear to indicate that the child and the family are both equal clients of the Ministry (eg, “this is neither a child centered or family centered approach” p.7) and show an intent to refocus child welfare practice, saying, “logically child protection is an important component of our work but the ministry cannot be orientated around a child protection model” p.7). This assumption again fails to understand the paramount duty to protect the child (as envisioned in the CF&CS Act). Additionally the child victim (who is smaller, dependent and powerless) is given no special protection but seen as part of the struggling family which is also a victim.

The lack of clear child welfare/protection language in the *Plan* is worrisome given that historically deaths have often come in periods when various governments moved in an extreme fashion between policies that protected children and initiatives designed to strengthen families. This kind of extreme pendulum swing in child welfare practice has confused child welfare Social Work practice and has left children in dangerous home situations. This must not occur as a result of the proposed *Plan*.

The Vision Statement in this document appears disconnected from past and recent child welfare history and experience in BC such as the knowledge gained from the deaths of Matthew Vaudreuil, Sherry Charlie, Savannah Hall and others. The document appears to be its own separate initiative with only cursory acknowledgement given to the insights and experience represented in the Gove Report and the Ted Hughes Review.

One social worker provided this feedback: "I agree the strength based practice is a good approach; however, it should not be the only guiding principle to child welfare practice. The difficulty with this theoretical approach is that it does not take into consideration the reality that humans behave in ways that are counter-productive or even harmful to themselves or the child's family members."

Another social worker noted that, "the strength based approach is a good approach in context but its inherent weakness is that it continues to focus on the families' strengths to the exclusion of acknowledging social realities like poverty, lack of housing, lack of accessible child care, stressors that contribute to risk creation but over which the family has little control."

FUNDING

The *Plan* does not acknowledge that the MCFD global budget will need to increase to provide a service-intensive family preservation approach to child welfare practice. The issue of funding is crucial, especially if the Ministry does not receive a large infusion of dollars in anticipation of the *Plan's* implementation.

STAFFING AND CASELOAD SIZE

The *Plan* speaks to the issues of caseload size, unique needs in various regions, salaries and the need for innovation (p.9). It appears to be articulating an ideal because an underfunded and understaffed child welfare service will not be able to deliver or benefit from the *Plan's* intended goal. If additional funds are not designated by government to support the *Plan* then it is likely that facilitating the new action goals will result in cutbacks in core areas of the child welfare system.

The child welfare service in BC is already under resourced as evidenced by its continued inability to complete child protection investigations, inadequate contact with children in care and difficulty monitoring the care provided in foster homes. Additional social workers will be needed to facilitate the labor intensive practice of Family Preservation focused child welfare. The *Plan* will be undoable and will lead to the increased vulnerability of at risk children if sufficient staffing levels are not put in place prior to implementation.

LEGISLATIVE CHANGE

The *Plan* does not include any reference to updating the CF&CS Act. BCASW recommends that the authors seek changes in the current legislation so that the Act mandates preserving and reunifying families as well as the paramount requirement of protecting children. This recommendation was made to government ten years ago, by two separate community panels that toured the province in a public consultation process. The BCASW also recommends that post majority services to children who have come into government care be enshrined in the legislation. There may be other legislative changes needed and as such the Act itself needs to be reviewed after being in place since 1996.

TIMELINES

The timelines for the implementation of the *Plan* range from six to fifteen months. These timelines are unrealistic and, if implemented, would cause chaos and severe strain in the child welfare system.

A careful review of past MCFD reorganization efforts will inform the *Plan's* authors of the vast numbers of social workers who permanently left the system or became ill (medical stress leave) during past rapid reorganization efforts. Social workers have clearly indicated that there is not capacity in the system to undergo rapid change while meeting the needs of children and families adequately. We are concerned for social workers caught up in the speed at which the Ministry may try to institute theoretical and procedural change. In past change endeavours such actions have resulted in poorly thought out organizational behaviours such as mandating policy implementation while only releasing draft policy for field practice (remember Kith and Kin). There are very real possibilities of several perfect storm scenarios implied in the *Plan*.

BCASW recommends that reasonable timelines be created after further consultation with MCFD social workers and community partners. This prudent action will help MCFD avoid a period of strain, stress and organizational chaos.

COMMUNITY SERVICE DELIVERY

BCASW is aware that community based social services agencies, staffed by trained professionals, provide eighty percent of MCFD funded family support services. The *Plan* clearly envisions a substantial increase in family support and early intervention services (p.9). The document unfortunately does not acknowledge the centrality of the community based social service agencies. This omission might be interpreted as a move to dismantle the comprehensive family support system delivered by community agencies in favour of a fragmented private contract system.

The *Plan* does not address the funding sustainability issues experienced by community social services agencies. Our information is that community-based agencies have not received funding increases for

operational and infrastructure costs in MCFD contracts for between 6 and 10 years, depending on the agency. Infrastructure costs now comprise 10-20% of community agency budgets. Any plan that is concerned with the delivery of community based family support services will need to include the provision of such costs in current and future contracts. According to the Bank of Canada's inflation calculator, for every \$1 an agency received for rent, heat, etc. in 1997, they now receive 77 cents.

Our conclusions have been confirmed by the Federation of Child and Family Services of BC and MCFD Joint Cost Research Project (2007). The government's reluctance to address these financial issues will result in a disconnect between the Ministry's goal of strengthening families and allowing at risk children to remain at home with the assistance of enhanced community based family support programs. As per the recommendation of the Federation of Child and Family Services the BCASW supports the inclusion of \$20 million dollars into the MCFD budget specifically to cover the inflationary costs on agency operational requirements.

AVAILABILITY OF SERVICES

The CF&CS Act states that children should be maintained in their homes and communities so long as they can be maintained with *available* (support) services. The *Plan* echoes the same sentiment in its Principles statement on providing a continuum of services to children and families...BUT... again the government document (p.4) uses "should" language rather than that the government "will" provide these essential services.

This government has not fulfilled its mandate to adequately fund family and child support services and in fact has persistently reduced the number of available services. Social workers report that even when services exist on paper (as in current post-majority youth in care funds and services) they are generally not available in practice.

Any plan to focus child welfare services on strengthening at risk families will need a fresh infusion of budget dollars designated specifically for the timely delivery of family support services. A plan that does not contain a commitment of additional dollars will lead to children being left in at risk homes while their parents wait for necessary services.

BCASW lauds the government for including the Fairness and Equity Principle (p.4) in the *Plan*. It is, in effect, making a commitment to fund and provide services to approximately 3500 children on the CLBC waitlist, child sexual abuse victims waiting for victims' trauma counseling, children in care who wait for prescribed or doctor recommended counseling and many others. The government's commitment to fairness and equity will require a corresponding commitment to adequate funding and services.

The current plan will need to articulate how government intends to provide this level of service to northern and rural families as this population has been severely underserved with their children failing to benefit from programs that primarily target lower mainland urban populations.

FOSTER HOME SYSTEMIC ISSUES

Lack of Capacity, Overcrowding and Abuse in Foster Care Homes

In section 1.1(5) and (6) the document comments on protection, therapeutic goals for children and retraining foster parents. The *Plan* fails to address specifically the strain and lack of capacity in the foster home system.

Systemic Capacity: It is clear that there are not enough homes in place to allow children to regularly be matched with foster parents with the appropriate skills to care for them. Additionally the system needs to review the number of children in each foster home; the level of needs for each child, especially if they are risk to other children (through, for example, exhibiting sexualized behaviors) and place a moratorium on the overcrowding of foster homes.

Foster Care Rates: Foster care rates will need to be reviewed and raised beyond current levels so that an adequate number of families indicate interest in being foster parents.

Respite for Foster Parents: The *Plan* needs to speak to making respite available as this will assist with foster home retention.

Internal Investigations: The *Plan* does not mention or address conditions in the foster care system that have led to a large number of internal investigations involving children who have been abused while residing in foster homes (both by foster caregivers and other children).

Assessment of Foster Homes: The *Plan* needs to address how foster parents are assessed in order to prevent children from being abused by their caregivers and decrease the amount of internal investigations per year

Redeployment of Resource Social Workers: The *Plan* does not address the ongoing concerns regarding the failure of the child welfare system to adequately monitor the care provided to children in foster homes. BCASW recommends that resource social workers move from their current foster home contract focus back to a more traditional role of supporting foster parents and monitoring the care of the children in each home.

MENTAL HEALTH SERVICES

The *Plan* does not adequately speak to the mental health needs of children in care.

In section 1.2 there is no mention of additional mental health services being available to children. There is a need to provide a continuum of services specifically for children who have suffered the trauma of being removed from their families. The effects of physical, sexual abuse and neglect within the family are well documented as are the traumatic effects of being removed from one's birth family. BCASW is convinced that mental health practices, post implementation of the *Plan*, must include offering children in care counseling and other services without medical barriers or the need for a psychiatric diagnosis prior to service. This recommendation is rooted in Social Work literature. Most recently the poor health and mental health outcomes for children in care is documented in *The Health and Well-Being of Children in Care in British Columbia* report of Jane Morley and Dr. Perry Kendall.

Additionally, the psychologists in the provincial SCAN (Suspected Child Abuse and Neglect) Clinics, as well as community based mental health providers, regularly make recommendations for additional therapeutic services for these children. MCFD social workers have frequently found that they cannot access these services due to the lack of funding. The services that are not considered obligatory include private therapists, play therapists, trauma therapists, private speech therapists, private counselors and private psychologists. This has been discussed at provincial meetings; the gap in funding services has been presented to MCFD leadership and is recognized by MCFD social workers who express frustration at not being able to access recommended services simply because of lack of government funding.

TRAINING

In section 4.2(38) there is mention of analyzing and documenting all current training offered to MCFD social workers but the *Plan* is nonspecific and fails to identify some of the core training being requested by MCFD social workers (eg specialized training in forensic interviewing, attending conferences on child maltreatment etc). The *Plan* does not include the required capacity building in the staffing of the child welfare system to avoid systemic strain while training takes place. The *Plan's* current timelines will place additional strain on social workers and will compromise their ability to fulfill their responsibilities to at risk children.

EVALUATION OF POLICY AND PRACTICE

RELATIONSHIP WITH THE REPRESENTATIVE FOR CHILDREN AND YOUTH

The *Plan* includes several references to internal MCFD evaluation measures but does not articulate a commitment by the Ministry to engage with the Representative for Children and Youth. The *Plan's* inclusion of one sentence to speak to this important relationship has raised concerns in the Social Work community. The *Plan's* failure to clearly articulate a commitment to the legislated external evaluation process continues to raise the spectre of Ministry secrecy and seems to confirm its reluctance to be held to public accountability.

The *Plan* acknowledges the need for Ministry transparency (see Principle #1 p.3) but does not make a clear commitment to transparency in its relationship with the Representative for Children and Youth. The absence of significant language indicating ongoing acceptance of Judge Hughes' recommendations regarding the office of the Representative is very disturbing. At first glance the *Plan* appears to be disconnected from Judge Hughes' recommendations regarding a monitoring relationship between the Ministry and the Representative.

The public's perception of the child welfare system will be significantly enhanced if the second draft makes clear the Ministry's commitment to cooperate with the external evaluative process legislated for that office.

MEDIA RELATIONS

The *Plan* implies a relationship with the media as an adversarial one. In the section, Description of Changes (p.10) the authors see the Ministry ideally "driven by the needs of children...not by crises which bring media and political attention". We hope the authors are not mirroring an official MCFD position that seems to indicate the Ministry is the only public institution that really understands the needs of the children and families of BC.

The authors also indicate their perception of the Ministry as always acting in the best interests of children. These perceptions are difficult to affirm given the recent history of government budget and staff cuts, child deaths, unfinished coroners investigations and deplorable conditions in some foster homes.

BCASW affirms the need for the media to inform the public regarding all developments in the BC child welfare system. A revised plan will need to include a more healthy understanding of the relationship between MCFD and the media. If the public is to regain confidence in the child welfare system it will need to see the Ministry following the *Plan's* stated principles regarding Transparency and Accountability for actions and services (p.3).

SINGLE FOCUS REGARDING RESEARCH

The commitment to evidence-based practice (EBP) and corollary comments about interest in research and cutting edge practice lay a particular foundation for narrowly focused practice changes that MCFD may introduce. EBP, like risk assessment ten years ago, is being positioned as a 'scientific solution' – one that will therefore be very difficult to challenge, despite the proliferation of critiques of EBP. Will EBP be introduced at great expense and then similarly abandoned?

As social workers, we know that the problems we encounter are multi-faceted and contextual, and almost all fall outside the simple lines of randomized control trials and proven cause-and-effect relationships.

BCASW absolutely supports informing MCFD policy and practice with research but that research must be drawn from many sources. We suggest that research with current and former MCFD clients has a great deal to offer (a true 'bottom up' approach). It will be important for MCFD to avail itself of a full range of research such as that offered by the University of Victoria RISC (Research Initiatives for Social Change) as well as other knowledge generated in BC Social Work research community.

REGULATION

The *Plan's* reference to regulation of social workers is particularly problematic, given that a very substantial proportion of MCFD line and supervisory workers are not professional social workers.

Although the *Gove Report* asked for a BSW as the required minimum entry point for child protection workers, we note that government rejected that recommendation and instead expanded entry requirements to include those with BA (CYC), MA and MEd degrees. The revised *Plan* will need to speak more specifically to the regulation of child welfare practice for the protection of the public.

FIRST NATIONS, OFF RESERVE, ABORIGINAL AND MCFD ABORIGINAL MAINSTREAM CONCERNS

The following is based on a review of the literature and the feedback of social workers practicing as part of First Nations communities, urban aboriginal agencies and MCFD aboriginal mainstream offices. The concerns raised in this section need to be addressed with tangible strategies that would give substance to the *Plan's* stated commitment to aboriginal control of aboriginal child welfare delivery.

The Vision Principle indicates that the government "values and respects aboriginal peoples' traditions, cultures, values and beliefs" and correctly notes "aboriginal peoples have an inherently different perspective or world view of family and community" (p.3). *The Vision Statement* also recognizes the MCFD goal that "aboriginal peoples, exercising their rights to jurisdiction over their children's well-being, through self-determination, have strong and healthy children, youth and families" (p.3).

The realization of this goal has not been experienced by aboriginal leadership or social workers and the process has not felt consultative or respectful of jurisdictional issues.

INHERENT RIGHTS

The *Plan* appears to wander into some jurisdictional areas of concern. Some have expressed concern to BCASW that the proposed regionalization process represents a government insertion of provincial crown agencies between First Nations governments.

A further jurisdictional concern comes from the *Plan's* apparent lack of regard for the principle of First Nations' inherent right to serve their members regardless of residency.

LACK OF CONSULTATION

The response from social workers in the aboriginal mainstream was that they had not been consulted in any meaningful fashion. MCFD and specifically the Northern Aboriginal Authority have not been seen as consulting adequately with grassroots First Nations directors regarding the current *Plan* for regionalization of child welfare services.

Social workers report First Nations child welfare agencies were not involved at the genesis of MCFD regionalization planning for the transfer of services to regional aboriginal authorities. Social workers in urban agencies also report that there was little or no consultation process prior to the release of the *Plan*, which was not released to them. Further, the content and nature of the plan does not address many of the issues experienced by social workers practicing in the urban setting. The lack of consultation regarding the plan seems somewhat out of character as the participation of urban aboriginal leadership in the shaping of Aboriginal child welfare services appears to have been in place since the beginning of the Aboriginal Authority process. The Vancouver Island Aboriginal Authority (VIATT) is staffed by aboriginal peoples including First Nations status, non status, Métis etc. We have heard from VIATT and the Authority in the Fraser Region that they are seeking consultation in respectful and culturally sensitive ways, with urban aboriginal agencies being updated monthly on the aims, objectives and timelines, success and challenges involved in acting on the Interim Authority legislation.

ACCOUNTABILITY

There is concern in the north that the current First Nations component of the *Plan* has been created by the Northern Aboriginal Authority, an MCFD created body, which appears to lack both transparency and accountability to the First Nations communities it was to represent.

INCLUSIVITY

Urban aboriginal service providers report concerns that MCFD is not focused on the 70% aboriginal population which lives off reserve. The *Plan* only mentions off reserve aboriginal peoples once (p.25) and nowhere mentions urban aboriginal people or the agencies that serve them. The *Plan* needs to be revised with information and planning components that represent the vision and needs of urban aboriginal families and children.

The *Plan* will also need to clarify the place of the MCFD aboriginal mainstream offices within the larger plan of transferring the care of urban aboriginal children to aboriginal agencies. It is unclear why more aboriginal agencies have not been established in urban centers (there are three in British Columbia) and why MCFD Aboriginal Teams continue to exist in their stead.

SINGLE FOCUS ON REGIONAL ABORIGINAL AUTHORITIES

First nations social workers note MCFD appears focused on only one way of organizing First Nations child welfare services. This single focus is viewed as an imposed MCFD-driven structure and an impediment to the consideration of other options. Many in the First Nations communities argue that better child welfare outcomes will occur when the structure of child welfare is more in line with aboriginal community and family values.

PROCESS

The Deputy Minister appears to be actively consulting First Nations Directors re the proposed regionalization plan, only after pressure was brought to bear by the First Nations Directors Forum, a body representing 156 of 198 First Nations communities. Many social workers report the regionalization process has not increased the trust between the MCFD and those providing First Nations child welfare services.

FUNDING: SEPARATE BUT NOT EQUAL

The *Plan* commits the provincial Ministry to negotiate with its federal counterpart at the Department of Indian and Northern Affairs and the BCASW supports this initiative.

The *Plan* fails to adequately address funding discrepancies between MCFD, First Nations, Aboriginal and Métis mandated agencies in areas such as staff salaries and operational dollars. Many of these issues are amenable to a provincial funding solution but none is offered. As a result of insufficient federal and provincial funding the current First Nations/aboriginal agencies are both separate and unequal in their capacity to serve their children and families.

The unequal funding of employee benefits and educational opportunities for First Nations/aboriginal agency social workers has resulted in agencies training workers and then losing them to both provincial and federal authorities who are able to provide better remuneration to their workers. This results in aboriginal and First Nations agencies continually training new workers and struggling to retain their experienced staff.

In MCFD aboriginal mainstream offices inadequate budgets mean fewer services contracted to meet the family support needs of aboriginal families, who subsequently languish on long waitlists.

Staffing shortages, retention problems and the lack of experienced social workers in MCFD, along with extreme caseload sizes, affect social workers' ability to provide services and assess risk.

The *Plan* does not provide a clear financial commitment to rectify issues that severely compromise social workers' ability to provide best practice within the MCFD aboriginal mainstream system. The *Plan* does not incorporate an analysis of increased staffing requirements or provide for reduced caseload size given the unique and often complex issues impacting aboriginal families receiving services from any of the three

streams of aboriginal child welfare agencies. These issues include the effects of residential schools, addiction, health, and poverty issues.

The *Plan* does not commit government to funding prevention as well as protection services in Aboriginal and Métis agencies.

CULTURAL SENSITIVITY

The *Plan* does not include a commitment to policy that mandates and monitors cultural planning as an essential activity for all aboriginal children and youth in care.

EXTENDED FAMILY CARE

Many at risk children within aboriginal communities are cared for in their extended family. The participation of extended family is considered best practice and while this is recognized by the Ministry there is no plan for the adequate and equitable financial support of those families. The *Plan* must specifically address the support, service and financial compensation of extended family on the same basis as non-related foster parents.

KITH AND KIN AGREEMENTS

The MCFD Kith and Kin Agreement option for extended family care has fallen out of use at this time -only 157 compared with 4000 children in the MEIA Child in the Home of a Relative Program. The Kith and Kin Agreement needs to be revived as part of planning for at risk children but this will only occur when the Kith and Kin agreement becomes financially just and viable. *Note this analysis is applicable for all children receiving this manner of care.*

Many of the aboriginal children who could receive services via this arrangement have special needs (FAS, ADHD, cognitive delays, mental health issues, emotional trauma). Increased funding and respite care would be just two areas of support that should be incorporated into the program.

Many elderly aboriginal grandparents and more specifically grandmothers are the kinship persons who step forward to care for the child(ren), and additional consideration needs to be given to their issues.

SOLE CUSTODY

The *Plan* needs to examine and articulate a financial arrangement for aboriginal and other grandparents who assume sole custody of their children's children. This practice is often promoted with the encouragement of MCFD but may only be in the 'best interest' of the child if a financial program of support is provided by the provincial child welfare system. Such an arrangement would acknowledge aboriginal culture where honouring elders and children are values of the utmost importance.

PAUSE IN THE CURRENT PROCESS

The regionalization process for Aboriginal Authorities needs to be paused while meaningful consultation is entered into with First Nations communities. The emerging structure of aboriginal child welfare services must be congruent with the vision of aboriginal leadership. It is equally important that the structure of child welfare not be imposed on First Nations peoples by the dominant child welfare culture (MCFD).

MÉTIS CHILDREN AND FAMILIES ISSUES ABSENT

The document fails to speak to the experience of Métis families and their children. There is no mention of the continued disappearance of Métis children into the child welfare system and the *Plan* seems mostly concerned with the reimbursement of funds from Indian and Northern Affairs Canada (INAC) for Aboriginal children.

IN CONCLUSION

This BCASW response to the *MCFD Good Practice Action Plan* has been submitted to MCFD Minister Tom Christensen and Deputy Minister Leslie duToit, with the request to include BCASW in ongoing consultations about the *Plan*. Our submission represents the good faith effort of professional social workers who have a particular interest in the field of child welfare Social Work, and encapsulates the areas of support and concern held by BCASW members.

On behalf of the BC Association of Social Workers and the BCASW Child Welfare and Family Committee,

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