

# Response: Independent Children's Monitor

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Response from Oranga Tamariki—Ministry for Children to the second full report of Aroturuki Tamariki – Independent Children's Monitor: Experiences of Care in Aotearoa: Agency Compliance with the National Care Standards and Related Matters Regulations

Reporting period 1 July 2021 – 30 June 2022



## Response to the second full report of the Independent Children’s Monitor

Oranga Tamariki—Ministry for Children (Oranga Tamariki) welcomes the second full report from Aroturuki Tamariki – Independent Children’s Monitor (the Monitor) on agency compliance with the National Care Standards (NCS) Regulations.

### Overview

Oranga Tamariki helps to ensure all tamariki and rangatahi are in loving whānau and communities where oranga tamariki can be realised. All of our leaders, kaimahi, strategic iwi partners, service providers and caregiving whānau play an important part in achieving this vision.

Our focus remains on supporting tamariki and rangatahi to be in safe, flourishing homes and communities. Equally, we are committed to ensuring rangatahi leaving care, or youth justice, get a good start to their adult lives.

Alongside our own self-monitoring, which is maturing over time, regular reporting and monitoring by the Monitor is a key part of making sure Oranga Tamariki fulfils its commitment to meeting the wellbeing needs of tamariki and rangatahi in our care and making sure those needs are championed across the children’s sector. In preparing their second full report, the Monitor met with Oranga Tamariki staff, gathered data and information about us, and visited communities to meet with tamariki and rangatahi in our care, their whānau and caregivers, and other professionals that support our work.

We value the independent view that the Monitor provides, the measures of accountability they hold us to, and their focus on supporting Oranga Tamariki to provide quality care that meets the needs of tamariki and rangatahi. The findings and insights from the Monitor’s report will be used to support ongoing continuous improvement that focuses on enhancing the quality of care for tamariki and rangatahi, and our support for their whānau and caregivers.

### Findings

The Monitor has detailed their key findings, which are drawn from data provided by Oranga Tamariki and other monitored agencies, and from their monitoring visits to communities across the motu.

1. Some progress has been made, however Oranga Tamariki is yet to fulfil the regulatory requirement to self-monitor its compliance with the National Care Standards Regulations.
2. For social workers to successfully perform their role they need to be able to spend more time with tamariki, rangatahi, whānau, caregivers and communities.
3. When staff lack cultural competence, relationships between Oranga Tamariki, whānau and other organisations can be negatively impacted.
4. To support tamariki and rangatahi to express their opinions, be involved in decisions, and share concerns, they need to know their rights.
5. The prevalence of disability among tamariki in care is not well understood.
6. Caregivers continue to tell us that they need more support.
7. Connections between Oranga Tamariki, health and education providers and communities remain splintered.
8. Lack of availability and access to mental health services continues to be a barrier.
9. Oranga Tamariki are not always assessing caregivers and their households before tamariki are placed with them.

## Response to key findings

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### 1. Oranga Tamariki is yet to fulfil the regulatory requirement to self-monitor its compliance with the National Care Standards Regulations.

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We are pleased the Monitor notes some progress has been made with our self-monitoring and agree that further work is needed to continue to strengthen our self-monitoring approach so that we are fully compliant with the NCS Regulations.

#### Progress since the last report

Since the Monitor's last annual report in January 2022 we have broadened and strengthened our case file analysis to provide further insight into the quality of our practice. This involves an in-depth manual review of cases to enable us to better understand not only whether something was done, but *how well* it was done. The sample size is large enough to produce data with a high level of confidence (95%) and the methodology is rigorous, which provides for accurate and reliable insights.

In response to the Monitor's previous reports and findings, the case file analysis work is now a core part of our practice quality assurance system. This will support more regular reporting within Oranga Tamariki on how we are tracking against the NCS Regulations, meaning action can be taken quicker to address gaps and opportunities for improvement in practice are identified sooner.

Frontline sites are now supported to conduct routine self-assessment of practice against the NCS Regulations. This enables continuous improvement by providing individualised feedback to social workers on their practice and means action can be taken locally to build on areas of strength and address any areas that require improvement.

We are developing an operational performance framework for self-monitoring, including identifying operational impacts mapped to the NCS Regulations. Each operational impact includes foundational measures that provide insights into how we are enacting the NCS Regulations in our daily practice. Preference is being given to structured data sets and existing measures so we can automate and ensure consistency.

We acknowledge the Monitor's preference is to see greater use of structured data to enable real-time tracking of compliance against the standards for all tamariki in care. We agree and are working towards strengthening our data systems and measurement approaches to enable this. This will continue to be supplemented from insights about practice quality from our case file analysis.

#### What we will do

While we have the core elements of our self-monitoring approach within our system, work is ongoing to confirm our overall self-monitoring framework, approach, and model. We are taking a continuous improvement approach to self-monitoring and expect to see growth in both the availability of data and information, as well as our ability to understand and respond.

Oranga Tamariki continues to develop self-monitoring measures, including detailed documentation articulating what each measure shows, dependencies, and how they are collated and calculated.

We will establish baselines and targets for the measures identified, which includes setting short-term and long-term targets, thresholds, or desired directional trends.

The next stage of our self-monitoring work involves developing reporting of the foundational measures we identified at each assurance level, including establishing regular reporting rhythms.

We will then commence work to automate the measures, which will inform reporting dashboards that enable access to timely reporting for improved decision-making.

Part of the work involves leveraging off Whiti (our performance reporting suite) to enhance internal visibility of measures and to help frontline kaimahi to meet the needs of those in our care.

The operational performance framework for self-monitoring system will be embedded over the next three to four years, with incremental changes and improvements over time. For example, as a result of introducing the new Caregiver Information System earlier this year, we expect to be able to provide more detailed reporting on caregiver assessment and support over the next reporting period, which were areas identified by the Monitor in their report.

## 2. For social workers to successfully perform their role they need to be able to spend more time with tamariki, rangatahi, whānau, caregivers and communities.

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As detailed by the Monitor, social workers are critical to ensuring needs of tamariki and rangatahi are identified and addressed.

The Monitor also acknowledged that although social workers told them about high workloads, they are yet to fully understand the root causes of this, particularly given the reduced numbers of tamariki and rangatahi in care, and the number of social workers which has increased by 30 percent since 2017.

### Progress since the last report

The Office of the Chief Social Worker has been undertaking work to better understand the workforce capacity demands for our social workers. This work will be supported by the Whiti/Enterprise Data & Analytics Programme (EDAP) by bringing all necessary data for modelling into one place and providing a toolset which will help us evidence and better understand social worker capacity. This work will examine capacity through a range of lenses, including the nature and complexity of the work and the requirements needed to ensure quality practice can be achieved.

The roll-out of Whiti is well underway across Oranga Tamariki. Whiti is a new reporting tool that pulls together the information frontline kaimahi need from our core systems to make it easier for them to access the information they need to better support tamariki, whānau and communities. Whiti allows kaimahi to access up-to-date information in a simple and convenient way and provides a view of all current mahi on hand and coming up in one place.

Whiti is tailored to support professional practice and resourcing decisions. Over time we expect that Whiti will be an important tool to support our frontline kaimahi to be able to spend more time with tamariki, rangatahi, whānau, caregivers and communities and have all the information they need in one place and in a timely manner. By providing greater visibility of work underway, Whiti will also assist social workers to plan and prioritise critical tasks such as engaging with tamariki in care within the appropriate timeframe and reviewing and updating plans.

### What we will do

We are developing an organisational demand and allocation model, which we plan to have implemented in the 2022/23 financial year. This will allow us to be more deliberate and robust in our financial decision-making, while meeting our legislative obligations to support tamariki and rangatahi.

The Office of the Chief Social Worker will continue to focus on better understanding social worker capacity, caseload complexity and workload management, while supporting frontline kaimahi with improved supervision support.

We will also simplify core processes and systems and redirect tasks that do not require a social work skill set so that social worker time can be directed primarily into relational ways of working with tamariki, whānau and caregivers.

The tools and resources that are being developed by Oranga Tamariki for kaimahi will allow social workers to spend more time with tamariki, rangatahi, whānau, caregivers and communities. Positive change is underway, and we expect to see this continue.

### 3. When staff lack cultural competence, relationships between Oranga Tamariki, whānau and other organisations can be negatively impacted.

The Oranga Tamariki executive leadership team, Te Riu, is committed to meeting the obligations under Te Tiriti o Waitangi and to fulfil our statutory commitments by improving the cultural responsiveness of Oranga Tamariki. Oranga Tamariki has a responsibility to the tamariki, rangatahi and whānau we work with to ensure that all kaimahi know and understand Māori cultural frameworks and how to apply these in their work. This is particularly important when building and strengthening relationships with tamariki, rangatahi and whānau in our work. We acknowledge that the Monitor found examples of practice which fall significantly below the expectations we hold for culturally responsive practice. Equally, we acknowledge the recognition of the importance of the skilled work undertaken by kairaranga ā-whānau staff to strengthen whakapapa connections and whanaungatanga relationships.

#### Progress since the last report

We have supported several community-based kaupapa Māori initiatives. On 6 March 2022 we launched Tākai, a community prevention initiative co-created with communities to meet the new shared vision: kia matua rautia – a thriving village raising children together. Tākai is grounded in mātauranga Māori and tamariki and rangatahi development evidence from our partners and focuses on the village of supporters around whānau, from pregnancy to five years of age.

We have developed and launched Te Hāpai Ō, our whole of organisation approach to build Māori cultural capability of our all our staff. Te Hāpai Ō includes five key workstreams that ensures our approach to enhancing cultural capability is comprehensive and cohesive:

- Tū Māia training programme: development and delivery of a training programme focused on growing cultural capability of all staff at Oranga Tamariki staff in partnership with Te Tauihu o Ngā Wānanga.
- Te Hāpai Ō Resources: development of a suite of cultural capability resources available to all staff on our learning management system, MyLearn.
- Māori Cultural Capability Baseline: establishment of a cultural capability baseline to measure Oranga Tamariki's cultural capability.
- Evaluation Framework: create an evaluation framework to monitor the effectiveness of Te Hāpai Ō and inform its ongoing development.
- Te Reo Māori Strategy: develop a Te Reo Māori strategy for Oranga Tamariki.

The first cohort of Oranga Tamariki staff have completed the Tū Māia 21-week training programme which started in May 2022 with 500 participants and concluded with 390. Celebratory events were held in November for each learning hub, hosted by our partners, Te Taihū o Ngā Wānanga.

### What we will do

The Te Hāpai Ō baseline report, scheduled for completion in early 2023, will focus and prioritise Oranga Tamariki resources to invest in those areas that support and enhance our cultural capability and respond specifically to systemic barriers that have enabled historical system inadequacies.

Ngā Taihū o Ngā Wānanga will provide an evaluation report in early 2023 of the experiences of Tū Māia participants from the first intake. Insights from the evaluation will inform the second intake in 2023.

Te Hāpai Ō resources will be available on MyLearn, our online professional development platform, to coincide with the release of the Te Hāpai Ō cultural capability baseline report. The ongoing refinement Tū Māia training resources will occur through to June 2023.

In 2023 Oranga Tamariki will work with Ngā Taihū o Ngā Wānanga and Oranga Tamariki to provide another Tū Māia intake. We will also explore accreditation and further training pathway options alongside Ngā Taihū o Ngā Wānanga.

The development of our Te Reo Māori strategy will commence in the 2023/24 financial year. This timeframe is intended to allow Oranga Tamariki to build a critical mass for cultural capability that can naturally progress toward a focused Te Reo Māori strategy.

#### 4. To support tamariki and rangatahi to express their opinions, be involved in decisions, and share concerns, they need to know their rights.

Tamariki and rangatahi are experts in their own lives. Engaging with them and advocating for their participation in decision-making helps to ensure the best decisions are being made.

We acknowledge our legislative responsibilities under section 5(1)(a) and section 11 of the Oranga Tamariki Act 1989 to actively encourage tamariki and rangatahi to have reasonable opportunities to participate and express their views on any proceeding or process on matters affecting them, and in a way that is appropriate for their age, development, language and/or disability. Section 7AA also sets out our responsibility to improve outcomes for tamariki Māori and their whānau, hapū and iwi to understand and respond to their views and experiences.

### Progress since the last report

In the last year our focus has been on growing our workforce capability and improving systems and processes to ensure that tamariki, rangatahi and whānau are supported to be heard and that their voices guide and influence our work.

Our Future Direction Plan is putting the voices of tamariki, rangatahi and whānau at the centre of decision-making at all levels of our organisation and supporting tamariki and whānau to participate in and be central to decision-making.

We have revised the 'My Rights, My Voice' booklet, a resource that kaimahi can use with tamariki and rangatahi to explain their right and supports they can access while in care. This was recently updated and made available for use from September 2022.

To further inform and strengthen the future design of practice in this area we have:

- Engaged in qualitative research undertaken in partnership with Point and Associates and a Community Design team to provide insights from rainbow and takatāpui rangatahi in care and recommendations for system actions and improvements.
- Completed a second Te Tohu o te Ora survey of 10 to 17-year-olds in care.
- Completed two reports that, for the first time, provide insights into the unique experiences of Pacific children and young people in our care, and Pacific adults whose children have come into our care: 'Talanoa mai Tamaiki – The voices of Pacific children and young people' and 'Ola manuia mo alo ma fanau Pasefika – A blessed wellbeing for our children, young people, and families'. These have been shared with our partners and will inform our future work.

Oranga Tamariki continues to support and work closely with VOYCE – Whakarongo Mai and we acknowledge the important role they provide for care experienced tamariki and rangatahi with a voice. VOYCE – Whakarongo Mai provide a Tangata Whaikaha advocacy service for disabled tamariki in care, supporting ongoing advocacy of care experienced rangatahi through the VOYCE national and regional youth councils, including advocacy and insights on system change issues.

In partnership with VOYCE – Whakarongo Mai we are progressing the Manaaki Kōrero project to deliver on Action point 1.4 of the Future Direction Plan, strengthening our feedback and complaints system so that it is 'fit for tamariki and whānau.' This project also includes making immediate improvements to grievance process in Oranga Tamariki residences. To date, there have been 14 successful engagements with 47 tamariki and rangatahi for this work. We have established a Steering Group with senior leaders and representatives from within the community (Māori, Pacific and Disability groups) and VOYCE – Whakarongo Mai to provide leadership, oversight, direction and advice on the Manaaki Kōrero project.

### What we will do

Building on our existing work to strengthen practice, we are developing a 'how to use' guide for the revised 'My Rights, My Voice' booklet to strengthen existing participation practice and processes. This is expected to be complete early 2023. We will implement a comprehensive suite of practice resources (tools, training, guides) to further support kaimahi to engage with tamariki and rangatahi in ways that enable meaningful and trusted relationships to be established and maintained.

Based on previous research and survey work to gain learning and insights into our future work in this area we will:

- Consider the recommendations for system actions and improvements from research into the voices of rainbow and takatāpui rangatahi in care.
- Release the national results of Te Tohu o te Ora in early 2023 (Te Mātātaki 2022), which are shared with sites and regions to understand the experiences of tamariki and rangatahi and inform practice improvement.

There are a number of new initiatives that we will commence including:

- Establishing another Youth Advisory Group in early 2023 that will actively engage with kaimahi across the organisation and provide insights and advice on matters that are important to them.
- Establishing a new full-time 'Advisor Rangatahi Voices' role for a rangatahi with lived experience of the care system, to champion and advocate for the voices of tamariki and rangatahi to be included across the system.

- Improving accessibility to information based on rights using, via design of leaflets and posters for sites and multimedia information based on insights from tamariki, rangatahi and whānau, with some elements being created and launched by the end March 2023, and all by end June 2023.
- Begin determining critical elements of future state participatory models by exploring tamariki and whānau-led decision-making approaches that will further support the ongoing transformation of our operating model and related initiatives.

The work will be an ongoing part of ensuring that tamariki and rangatahi know their rights and improvements will start to be apparent over the next 12 to 18 months, with a focus on understanding which solutions are enabling us to address this finding. We expect that the Monitor may see some improvement in this area in their forthcoming monitoring cycle.

## 5. The prevalence of disability among tamariki in care is not well understood.

Oranga Tamariki has been challenged in recent years to improve disability data and evidence in relation to disabled tamariki and rangatahi in care. We acknowledge that quality data and evidence is required to help improve outcomes for our disabled children and whānau.

### Progress since the last report

We have developed our Disability Evidence Plan and guidance for Working with Disabled People and this is now on the Practice Centre, which contains all our practice policies, guidance, and tools, where it can be easily accessed by our kaimahi. This includes assessment of needs relating to any disability, working with disabled tamariki and the whānau or family who may need specialist out of home care, and working with disability and learning supports and ACC.

The Disability Evidence Plan supports our Disability Strategy and work programme. It will continue to be adapted as the strategy is further developed and as we learn through data, research, and evaluation activities and wider engagement. The plan also incorporates monitoring, evaluation, research, and learning activities, including disability data improvement and specific research and evaluation activities, the evidence plan broadly sets out work focus areas for the next two to five years.

The Disability Evidence Plan includes improvements to existing disability data prevalence measurement using CYRAS data and research to inform an improved disability data model. These data and evidence activities support current and future state Oranga Tamariki disability data and evidence improvements.

We have established a Disability Advisory Group made up of six experts from a range of backgrounds who will work closely with the Chief Advisor Disability to provide advice and feedback to senior leaders at Oranga Tamariki.

### What we will do

We will continue our evidence work as set out above, including improving existing disability data prevalence measurement using CYRAS data for monitoring and research to inform an improved disability 'data model' for data collection and use.

Work will commence that examines tamariki and rangatahi in the care of Oranga Tamariki who receive Disability Support Services to help Oranga Tamariki better understand their experiences and the care they receive.

Over the next six to 18 months the focus will be on disability data improvements and key research and evaluation priorities, specifically to help inform data improvements and our understanding of how these tamariki are experiencing care.

The Disability Advisory Group will provide advice on the Disability Strategy, which will help make positive changes to our services for disabled people, and to uphold the rights of tamariki and rangatahi whaikaha (disabled children and young people) and whānau hauā (disabled families). This work will help enhance our understanding of the prevalence, and experience, of disabled tamariki and rangatahi.

## 6. Caregivers continue to tell us that they need more support.

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Caregiver support is a collaboration between all kaimahi in the Service Delivery team, with a robust kete of supports provided to caregivers. These form part of a Caregiver Support Plan, which is developed with individual caregivers and tailored to their needs in relation to caring for tamariki placed with them.

### Progress since the last report

The rollout of the Caregiver Information System (CGIS) has been completed and from 1 July 2022 has been used to record all caregiver-related information. The system provides high levels of confidence by way of structured data and reporting. This assurance is relevant to the NCS Regulations – Part 3 and carries the expectation that applicants are supported and guided by our kaimahi through their enquiry, application, and assessment stages.

An induction package on how to use the new system has been developed and all new users of the system have completed the induction. The induction package also includes important information on how to use CGIS in conjunction with CYRAS, our case management system.

Oranga Tamariki has provided financial support for caregivers, including making caregivers aware of their entitlements to financial support at the time of assessment and approval. The Caregiver Kete (provided to all Caregivers at time of approval and available on our website and as a physical copy) contains this information as well. Changes to Board Rates are communicated with social workers and caregivers using our website and in writing using the fortnightly 'Care Matters' newsletter.

Oranga Tamariki has provided 3,382 days of respite care for tamariki and rangatahi who are placed with caregivers. We actively support caregivers to have rest periods when they feel they need this.

We have delivered 'Prepare to Care' training to 385 new caregivers in the last six months, 242 of whom are whānau, 141 non whānau and two-family home caregivers. Trauma Informed Learning opportunities were taken up by 155 caregivers in 2022 (to November). More than 1,000 caregivers have undertaken this learning since its inception as part of the Budget 2019 initiatives.

The Caregiver Assistance Programme has been used by 112 caregivers, representing 207 hours of counselling and support services.

### What we will do

Over the next year we will continue to look for any changes in the way caregivers speak about their experiences and how they are being supported to provide care to the tamariki in their care.

We will seek to better understand the support themes that caregivers report as not being met.

Our expectation is that change and continuous improvement will be evident in future reports from the Monitor and the provision of information to the Monitor will be more fulsome.

## 7. Connections between Oranga Tamariki, health and education providers and communities remain splintered.

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Oranga Tamariki social workers, alongside all kaimahi working with whānau, need support from other agencies to do their job and build trust with children, young people, families, whānau, and communities. There needs to be good cross-agency relationships at the frontline. The Monitor acknowledged that quality care requires the help of other agencies.

### Progress since the last report

In July 2022, the Minister for Children announced the first Oranga Tamariki Action Plan (OTAP), issued under the Children's Act 2014. The purpose of OTAP is to define how the chief executives of children's agencies will work together to improve the well-being of the "core populations of interest" as defined in the Children's Act, and their shared responsibilities for achieving this.

Through OTAP, children's agencies are working together to towards a place where:

- Tamariki, rangatahi and whānau, get the help they need, when they need it, no matter where they live, experience a coordinated, unified approach in having their needs met and know about the supports and services available to them, have confidence in using them, and believe their needs are being addressed and their views heard.
- Iwi and communities are enabled to provide tailored and flexible supports for tamariki and rangatahi, and are supported and resourced to develop collective child wellbeing objectives and implement collaborative local prevention responses.
- Social workers, carers, and others who work with children and young people are able to access services and supports for the tamariki and rangatahi they are advocating for, in a timely way, and able to collaborate across agencies and with whānau and local communities to pursue the best solutions for tamariki and rangatahi they work with.
- The children's system is a cohesive system where collaboration across agencies and with iwi and communities is the norm and is prioritised, has a good foundation of information sharing and is underpinned by evidence-based decision-making and is equipped with effective policies, processes, structures and tools to enable agencies to deliver good outcomes, and hold agencies accountable (individually and collectively).

Since publishing the first OTAP, Child and Youth Wellbeing Ministers have agreed accountability arrangements to monitor and ensure that the children's agencies chief executives are held accountable for delivering its actions.

Oranga Tamariki has worked with other agencies to establish the relationships and connections needed to deliver the broader OTAP and has also delivered on its own short-term actions, which are set out in OTAP's accompanying Implementation Plan, including: four in-depth assessments of need in the areas of education, health and housing (Action Three), with a focus on tamariki and rangatahi whaikaha, developed a Prototype Evidence and Indicators Dashboard (Action Four), led a cross-agency response to the first in-depth assessment of need (Action Six) and provided advice to Ministers on initiating a review of the Gateway assessment process.

### What we will do

We will work with Regional Public Service Commissioners on how they can help drive support for and engagement in OTAP and actions through regional leadership (agencies, iwi, local government and partners) to enable locally-led solutions.

We will provide the first six-monthly OTAP implementation progress report to Child and Youth Wellbeing Ministers. The latest version of the Evidence and Indicator Dashboard will be provided with the report.

We will also progress the next tranche of in-depth assessments and provide cross-agency responses to the in-depth assessments that were completed in 2022.

The actions in OTAP and the Implementation Plan range from immediate activities (the next six months) to work programmes that may span many years. Given impacts are seen in the outcomes of cohorts of tamariki and rangatahi as they transition from children's services to adult services and onwards, broad improvements in outcomes follow on a similar timescale.

### 8. Lack of availability and access to mental health services continues to be a barrier.

Government agencies are committed to improving mental health and wellbeing of tamariki and rangatahi involved with Oranga Tamariki. There are significant mental health and wellbeing initiatives underway which will both directly and indirectly contribute to the mental health and wellbeing of tamariki and rangatahi involved with Oranga Tamariki. We will continue to support these key initiatives.

### Progress since the last report

Under Action Three of OTAP, Oranga Tamariki delivered an in-depth assessment of health needs, particularly mental health needs, for the cohort of tamariki and rangatahi who are in care. It identified five focus areas for government agencies to help improve mental health and wellbeing for tamariki and rangatahi involved with Oranga Tamariki and their whānau and families, and support them to be prioritised for access to services within the system. These are:

- Identify what a good system response looks like including the roles of relevant agencies.
- Build frontline workers' and caregivers' knowledge in identifying and addressing needs.
- Improve collaboration and navigation of the system.
- Increase the capacity of existing services and supports for moderate to high needs.
- Investigate current levels of unmet mental health and wellbeing needs.

### What we will do

Under Action Six of OTAP, we will deliver the cross-agency response to the in-depth assessment of need, for consideration by the Social Wellbeing Board. The cross-agency response sets out options to improve access to services to meet the needs of this cohort, including critical indicators to measure progress.

9. Oranga Tamariki are not always assessing caregivers and their households before tamariki are placed with them.

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Our policy on caregiver and adoptive applicant assessment and approval is that caregivers must be assessed and approved as suitable before tamariki or rangatahi can be placed with them. In urgent situations, this may be a provisional assessment.

The requirement for an assessment to occur is clear, and mechanisms are in place as part of CGIS for the assessment and approval process to happen.

The finding by the Monitor that this practice is not always happening is concerning, and we are remedying this with urgency. We are reviewing when and why this is happening and following up with practitioners to ensure the approval process is being adhered to and identify the tools and resources required by practitioners meet Regulation 47.

**What we will do**

We will determine when and why assessment and approval is not occurring as it should to understand what further support needs to be provided to assist our kaimahi to meet Regulation 47. We will also communicate with practitioners, via established channels, to improve awareness and understanding of the policy and practice guidance.

We expect to see improvements within six months as a consequence of better understanding of the policy and practice guidance. Other timeframes to realise change will depend on the outcome of the work identified above.