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Dear Madam/Sir

# ACTCOSS submission: Draft ACT Youth Justice Strategic Plan 2026-2031

ACTCOSS supports the direction of the draft Plan released for consultation by the Health and Community Services Directorate (HCSD). Raising the minimum age of criminal responsibility to 14 was a national first, a move ACTCOSS supported in evidence to the Senate inquiry into Australia's youth justice and incarceration system on 3 July 2026. The commitment to Closing the Gap Target 11, the human rights grounding and the consolidation of oversight findings into a single document are all welcome.

ACTCOSS also welcomes the Plain English and Easy Read versions released with the draft, including the offer of a phone call back for people who cannot respond in writing. This is appropriate given the intersection of youth incarceration and disability.

## Alignment with ACT Auditor-General report on Government long-term plans and strategies

Strategies are only as valuable as their implementation, which requires clear allocation of responsibilities, strong governance, evaluation and accountability through transparent reporting. The draft Plan currently repeats the weaknesses the Auditor-General identified across ACT Government long-term plans and strategies in Information Report No. 3 of 2025. That report set out five elements of an effective long-term plan or strategy:

1. roles and responsibilities are clearly allocated, so that accountability for delivery is clear;
2. a governance or oversight group coordinates delivery and is accountable for progress;
3. the plan identifies how information will be collected to show whether it is achieving its outcomes over time;
4. evaluation arrangements are set at the outset, so that effectiveness can be assessed objectively; and
5. performance reporting is accurate, timely and useful to stakeholders.

The Government response undertook that directorates would consider these findings when developing future long-term plans and strategies. This draft HCSD plan falls within the scope of that undertaking. ACTCOSS has applied the Auditor-General's framework to the draft Plan and benchmarked the result against the 55 plans in the audit sample.

**The draft Plan graded against the Auditor-General's five elements and benchmarked against the audit sample.**

| Element | The 55 plans considered by the Auditor-General | | | | ACTCOSS analysis of the draft Plan | | |
|---|---|---|---|---|---|---|---|
| | Met | Met in part | Not met | Sample median | Grade | Versus sample from audit | Comment |
| **Roles and responsibilities** | 39 | 7 | 9 | Met | **Partially met** | **Below median – 39 of 55 score higher** | Responsibility sits at HCSD level only. No specific agency is named against individual actions, and community sector and ACCO delivery partners have no defined role. This risks diffused accountability. |
| **Governance or oversight group** | 17 | 9 | 29 | Not met | **Not met** | **In line with median** | The draft Plan lists external scrutiny bodies but establishes no group to coordinate delivery or carry accountability for it. This risks strategic drift over the life of the Plan. |
| **How progress information will be collected** | 13 | 26 | 16 | Partially met | **Not met** | **Below median – 39 of 55 score higher** | Establishing baseline measures is itself a future action, so the draft Plan would commence without a baseline. Any later evaluation would have nothing against which to measure change, and would be exposed to selective reporting. |
| **Monitoring and evaluation** | 40 | 6 | 9 | Met | **Partially met** | **Below median – 40 of 55 score higher** | No evaluation of the Plan is committed. The only evaluation named is the 2028 statutory review of the minimum age amendments, which examines legislation rather than this Plan. |
| **Commitment to report performance** | 32 | 5 | 18 | Met | **Met** | **In line with median** | Annual written reviews from 2027, provided to the Minister and tabled in the Assembly. Without an evaluation framework, it is not clear what will be reported. |

ACTCOSS views the Auditor-General's five elements as the standard, and the community should be able to expect that a long-term plan or strategy meets all five. Applying the principles set out in the Auditor-General's report, ACTCOSS has assessed the draft Plan as currently only fully meeting one of the five elements (performance reporting) and partially meeting another two.

In preparing this submission, ACTCOSS also compared the performance of the Plan to the median of the 55 plans and strategies graded by the Auditor-General in the 2025 report. This second, lower benchmark describes ACT Government strategy design practice at the time of the Auditor-General's report. The draft Plan falls below that median benchmark on three of the five elements.

This draft is among the first strategies released for public consultation since the Auditor-General reported and since the Government undertook that directorates would consider the findings in developing future long-term plans and strategies. A strategy prepared after that undertaking would be expected to sit above the median, not below it. That it does not is concerning. The ACT community expects that:

- The Auditor-General’s findings are taken up and socialised within HCSD, and more broadly across the ACTPS, meaning that they are considered in developing the Plan; and
- There is strategic planning capacity within the ACT Public Service (ACTPS), and HCSD specifically, which will enable the draft Plan to effectively implement the elements identified by the Auditor-General.

## Contents of the draft Plan

The draft Plan contains 43 future actions. Of these:

- 23 (53 per cent) use language that commits only to exploring, investigating or considering rather than to delivering. An action is counted as exploratory where its operative verb is “explore”, “investigate” or “consider”, or where it commits only to examining options. The Easy Read version is helpfully more direct in this regard, describing commitments to “look at”.
- Only one action carries a delivery date.
- No action is costed, and the Plan does not identify which actions are funded, which are unfunded and which depend on future budget decisions.

The draft Plan does not provide for an action plan. The Auditor-General found that short-term action plans support accountability because they require directorates to allocate resources, assign responsibility and design evaluation, and that monitoring and evaluation are better planned at the outset than deferred. The Plan relies on *Next Steps for Our Kids* and the *Disability Justice Strategy*, both of which have published action plans.

As drafted, the annual reviews will report on the progress of exploration, with no deadlines and no framework against which to assess success. The community will have no firm commitments against which to assess Government performance, and Government itself is exposed to strategic drift.

## Recommendations

1. Revise the draft Plan so that it meets all five elements set out in the Auditor-General's report.
2. Provide for two-year action plans under the Plan and publish the first of these. It should be costed, name the directorate and delivery partners responsible for each action, carry delivery dates, and state which actions are unfunded.
3. Establish a governance group for the Plan in partnership with the Aboriginal and Torres Strait Islander community, and publish its terms of reference.
4. Publish baseline measures and quantified targets in the final Plan, and describe how the supporting data will be collected.
5. Commit in the Plan to an independent and funded evaluation, with the methodology published at commencement and a clear timeline for public release of the results.

6. Retain the commitment to annual tabled reviews, and strengthen it by reporting against the baselines and targets in recommendation 4.

We would welcome the opportunity to work with the Minister and HCSD on implementation.

Yours sincerely

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