

Hon Dr S.E. Talbot, MLC
Parliament House
4 Harvest Terrace
West Perth WA 6005
Via – jsccecyp@parliament.wa.gov.au

28 February 2019

Dear Dr Talbot,

Thank you for your invitation to the West Australian Council of Social Service to make a written submission addressing the terms of reference for the Inquiry into the monitoring and enforcing of Child Safe Standards. Our submission is enclosed.

WACOSS would welcome the opportunity to present in person to the Inquiry given the relatively short period of time made available to provide a written submission.

If you would like to discuss this submission further, please contact Sue Nye, Manager Social Policy, sue@wacoss.org.au, 08 94207222.

Yours sincerely,

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Chief Executive Officer
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Submission to *The Joint Standing Committee*
on the Commissioner for Children and Young People on
An Inquiry into the Monitoring and Enforcing of Child Safe Standards

February 2019

Background to this submission:

The Western Australian Council of Social Service Inc. (WACOSS) welcomes the opportunity to make a submission to The Joint Standing Committee on the Commissioner for Children and Young People on the *Inquiry into the Monitoring and Enforcing of Child Safe Standards* (Hereon referred to as The Committee). A response to The Committee terms of reference is provided below.

WACOSS is the peak body of community service organisations and individuals in Western Australia. WACOSS stands for an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians and to strengthen the community services sector that supports them. WACOSS is part of a national network consisting of ACOSS and the State and Territory Councils of Social Service, who assist people on low incomes and experiencing disadvantage Australia wide.

This submission has been informed by members of the Children's Policy Advisory Committee (CPAC) comprised of WACOSS members who provide services and support to children and their families across Western Australia. Their 'on the ground' experience has informed the response to this submission. A list of those agencies who have contributed is provided at Appendix 2.

Members who informed this submission specifically requested that we draw Committee members' attention to the [Uluru Statement from the Heart](#), in the hope that this statement will guide, inform and direct members' deliberations. The Statement provides profound and important advice from Aboriginal leaders and their voice for social justice applies equally to their children and young people.

We would like the Committee to note that this is a preliminary and necessarily brief response, as the request for submissions was received on the 19th of December and, due to the Christmas New Year holiday period, this resulted in limited capacity and time to prepare a comprehensive response by 28 February. WACOSS would appreciate the opportunity to follow up this written submission by presenting to the Committee at a future date.

WACOSS notes that the terms of reference for submissions to the Inquiry are:

The Committee will examine the scope and direction of the work currently being undertaken by government agencies, regulatory bodies and non-government organisations to improve the monitoring of child safe standards and the role of the Commissioner for Children and Young People in ensuring Western Australia's independent oversight mechanisms operate in a way that makes the interests of children and young people the paramount consideration. In particular, the Committee will consider the following:

- *The recommendations made by the Commissioner for Children and Young People in the report 'Oversight of services for children and young people in Western Australia';*

- *The recommendations from the ‘Royal Commission into Institutional Responses to Child Sexual Abuse’ relating to an independent oversight body responsible for monitoring and enforcing child safe standards; and*
- *The response from the State Government of Western Australia to the above recommendations.*

In this report we have described what we believe to be some of the key issues that are most important to the safety and wellbeing of children and young people.

Our Broad Position:

All children and young people deserve to be safe, treated with dignity and respect and be nurtured and grow to their full potential. WACOSS fully endorses the Royal Commission into Institutional Responses to Child Sexual Abuse statement below:

We believe government and institutional investment to prevent institutional child sexual abuse is justified. Institutional child sexual abuse often has lifelong repercussions and can have significant social and economic consequences on victims and survivors, their family and friends, and the community. Significant social and economic costs of institutional child sexual abuse include costs related to healthcare, lost earnings and tax revenue; increased need for welfare and child protection; an added burden on the criminal justice system; and higher rates of crime.¹

WACOSS endorses the importance of setting minimum standards for the protection of children and young people. We also recognise that standards can assist in shaping a minimum set of requirements or a benchmark for a minimum level of service a provider must meet (assuming that there are audit and compliance mechanisms in place to oversight adherence to minimum standards). While acknowledging these benefits, we advise caution around an exclusive focus on standards because:

- The adherence to a set of standards cannot, in and of itself, guarantee the safety of children and young people. A multiplicity of factors must be considered as the antecedents and causes of harm are varied and complex.
- There is a need for robust and intentional efforts to ensure children and young people are kept safe and live good lives. That is, wherever possible we want our most marginalised and vulnerable children and young people out of institutions, off the streets and living within nurturing and safe families. While it is understandable that the standards address the needs of children accessing a variety of services it is important to recognise that some services have a profound and enduring impact on children and young people’s lives, particularly if they are in care or incarcerated. The draft² Child Safe Standards do not currently provide for an active, sustained and intentional effort to reconnect and reunify children and young people with safe families. For example, many Aboriginal children currently in care, could be placed with safe and secure family members if further connections and relationships were built with Aboriginal placement agencies.
- It is critical that any processes of standards monitoring, accreditation or assessment do not become barriers in themselves to the ability to place or keep children (particularly Aboriginal

¹ *Royal Commission into Institutional Responses to Child Sexual Abuse: Making Institutions Child Safe Vol. 6. P 275*

² At time of writing the standards had not been endorsed by COAG.

children) safe in the care of their family and community. We would not want child safe standards to become a perverse incentive to place children in accredited institutional or foster care ahead of other options more conducive to their social and emotional well-being and consistent with the priorities of Aboriginal child placement principle.

- We note that the first child safe standard *Standard 1: Child safety* is embedded in organisational leadership, governance and culture. We strongly support this standard because, despite the advantages of a rigorous selection process described earlier, employees can become disempowered by systemic practices and culture of the workplace leading to ‘desensitisation’ to the signals of abuse. For example, staff being inhibited from speaking up if they are concerned about another staff member behaving inappropriately with a child or young person. Creating a culture where staff feel safe to do this, and there are the systems in place to respond, is critical for an organisation to be child and youth safe. In NSW and Victoria there are ‘reportable conduct schemes’ whereby the Ombudsman has oversight of abuse and neglect of children and young people by staff in an organisation.

Key Considerations, Child Safe Standards:

Notwithstanding the comments above, WACOSS is keen to support initiatives that will result in improved oversight including child safe standards. Below we have identified ‘headline’ considerations. These issues are provided in a summary form and a more comprehensive response could be provided on request to at a future Committee hearing.

1. We need a system monitored by a single independent oversight body that ensures the safety of children and young people, gives them a voice and hears their grievances, and advocates on their behalf by providing a child and youth focused complaints handling process. It is essential that the system developed for keeping children safe is completely independent and autonomous. The proposed advocacy and grievance mechanism must be independent of Government, but also include the capacity for de-identified and aggregated issues to be reported to Parliament.
2. It is the case that adults who love and care for children keep them safe. While a system of oversight is required and supported, for abuse to be prevented, children need to be surrounded by people who love and care for them and have their best interests at heart. We recommend that an oversight system include care plans that are underpinned by intentional strategies to build informal networks of support around children, through maintenance of connection and relationship to, or reunification with, trusted family members and carers. Where this is not possible, we need to adequately remunerate skilled support workers and peer workers, capable of walking alongside children and young people to build their relationships with trusted adults in their communities.
3. Aboriginal and Torres Strait Islander children may be less likely to disclose abuse due to a lack of cultural safety and a fear of authorities intruding into their family and community, based on historic experiences of systemic racism and abuse. The final report of the *Royal Commission into Institutional Responses to Child Sexual Abuse* states: “...the ongoing impacts of racially discriminatory policies combined with ongoing systemic racism means that Aboriginal and Torres

*Strait Islander children are likely to face heightened risks of sexual abuse in institutions.*³

For these reasons it is critical that:

- As a matter of urgency, along with other Australian jurisdictions, Western Australia should appoint an Aboriginal Commissioner for Children.
 - An independent oversight body based on an appropriate and culturally secure model co-design with Aboriginal people.
4. The oversight system must have the capability and capacity to ensure the safety of individual children, to support them to come forward with complaints about abuse and neglect, and for those concerns to be taken seriously and acted upon. Individual advocacy, including the opportunity to seek redress, is vital to ensure children and young people reporting harm, abuse and neglect are supported to receive the help they need. Individual advocacy should proactively monitor the safety and wellbeing of children and young people. This is in addition to services having a child and youth focused complaints handling system, and policies and procedures in place to ensure children and young people are taken seriously. Consideration should be given to a central complaints register where an institution has to register any complaints relating to safety of children and report on how the concerns were addressed to provide external accountability and monitoring.
 5. The oversight system must have the capacity to aggregate de-identified information to inform systemic advocacy policy, regulatory and legislative reforms and report directly to Parliament providing actionable recommendations to improve outcomes for children and make communities safer places for children to live.
 6. The system of oversight should be co-designed in partnership with children, families, communities, government and non-government stakeholders. Special consideration will need to be given to ensure strong engagement with Aboriginal leaders, community-controlled services, advocates and other stakeholders so that the proposed system is culturally secure and is safe and trusted by Aboriginal children and their families.
 7. The system will require strong leadership with statutory powers that ensure oversight is not compromised or 'hamstrung' by legal or bureaucratic impediments that would prevent access to information to inform the work required. This should incorporate investigatory powers, similar to those recommended regarding an expanded *Health and Disability Services Complaints Office* in the Consultation Paper on a National Code of Conduct for Health Care Workers⁴. This would enable the oversight body to conduct targeted research and investigations to target problems in WA and create a more robust system.
 8. WACOSS notes that this Inquiry is in relation to the Child Safe Standards identified on the Committee website. Our understanding is that these standards are draft and will be considered at a forthcoming Council of Australian Governments Meeting (COAG). WACOSS notes that other standards are in place for children's services for example the Education and Care Standards, the National Standards for Out of Home Care and the Disability Standards. Consideration will need

³ *Final Report: Making institutions child safe*. Royal Commission into Institutional Responses to Child Sexual Abuse. P173

⁴ https://www.hadscow.gov.au/docs/HaDSCO_National%20Code%20Consultation%20Paper_December%202017.pdf

to be given to ensuring the safety of children, while minimising the reporting burden of services and avoiding gaps and duplication in reporting. One comprehensive system of independent oversight for all children and young people (as favoured by WACOSS) could potentially minimise reporting burden as well as avoiding gaps and duplications

9. We note that the proposed child safe standards are not an accreditation-based system. There may be accreditation programs that incorporate consideration of the standards, however the process for reviewing or approving accreditation programs is not clear. Consequently, receiving accreditation under a quality assurance program does not necessarily guarantee that an organisation or service will be compliant with the standards.
10. The issues of accreditation, accountability to children and monitoring to improve service quality are complex. This is due in part to factors such as:
 - multiple contractual and funding arrangements as services may receive funding from multiple sources including State and Federal Government, corporate and philanthropic funders;
 - siloed data gathering and sharing protocols making it difficult to 'track' outcomes for children as they 'move through the system'; and
 - a lack of investment in building the capability and capacity of the children's services sector to build processes that can increase transparency and accountability.

Factors such as these can undermine accountability and transparency. Children deserve standards and a system that they can easily access, feel confident is accountable, is monitored and reported on in a way that provides individual advocacy and addresses their concerns and leads to quality improvement and reforms.

Further consultation, with the sector, Aboriginal leaders and communities is required if we are to improve the level of accountability and adherence to standards and to ensure a consistent, timely and robust improvement of the service system.

11. Once children and young people have disclosed abuse and/or neglect it is essential that those children are supported through a process of healing, counselling, or therapy. Many of these children will need support over extended periods of time. The process of healing is unique for every child and responses need to be flexible and timely. It is important to recognise that most abuse is disclosed many years after it occurs, and systems will need the flexibility to respond over time.

Aboriginal Community Controlled Organisations (ACCOs) have a key role to play here. The success of ACCOs is grounded in their ability to provide services that emphasise connectedness through relationships with family, community and country; health and material wellbeing underpinned by resilience and strong spirit; and self-determination, including freedom from stigma and discrimination.⁵ These approaches are inherently culturally specific and demonstrate why Aboriginal Community Controlled Organisations are best placed to deliver therapeutic healing.

⁵ Clare Tilbury (2015) *Moving to Prevention research report: Intensive Family Support Services for Aboriginal and Torres Strait Islander children*, SNAICC and Griffith University.

The broad literature on Aboriginal and Torres Strait Islander child safety suggests that ‘provided the necessary social conditions’ are in place, Aboriginal and Torres Strait Islander cultures ‘act as a protective force for children and families’.⁶ Aboriginal and Torres Strait Islander cultures – where children are the collective responsibility of the community – are highly protective of children. Strong culture is also protective because it builds resilience in communities to help mitigate the negative consequences of past policies and contemporary racism. When Aboriginal and Torres Strait Islander children are disconnected from their culture in institutional settings, they face fewer protective factors against child sexual abuse, such as strong attachments with multiple caregivers, a high self-esteem and positive social connections.

12. WACOSS supports the development of an Education Strategy that could help influence communities’ views about the value and status of children and establish a broader culture shift around keeping children safe. The child abuse research literature supports the view that children are more at risk of abuse and neglect when they lack status, dignity and respect.

For example, Polonko and Lombardo said “..violating and not supporting human dignity in childhood helps produce a world populated by adults who, having been harmed as children, go on to harm and violate others as adults.”⁷ If we are to break the potential cycles of abuse and neglect of children then the oversight system must have the capacity, capability and resources to report on and influence the standing of children in Western Australia.

We acknowledge the importance of campaigns such as [The Valuing Children’s Initiative](#) in influencing a shift in societal attitudes about the rights of children and the role we can all play in keeping children safe. We refer the Committee to the valuable work being developed in regard to culture change within communities by VCI.

13. Once the system of oversight is established, it will be important to equip children and young people with knowledge of the standards. This is important for their empowerment, ability to advocate on behalf of themselves, as well as improve service navigation. Standards, as a broad and clear framework for the basic requirements of services, provide an opportunity for the State to empower young people, who are often denied agency and understanding. By developing a clear and robust set of standards, an opportunity presents itself to communicate these standards and rights to the young people they are intended to serve.

Effective and appropriate communication will be critical to ensuring that children and young people understand what their rights are, how they can stay safe, how to respond and where to go for help when their safety and wellbeing is threatened. These efforts need to be well designed and resourced to reach children and young people effectively.

14. WACOSS supports the development, using a co-design process, of a Child Safe Standards Workforce Strategy. The strategy would address the recruitment, appointment, selection, appointment induction and ongoing training and development of a child safe workforce. Staff appraisal processes should include identifying the key behaviours expected of staff that

⁶ Strengths of Australian Aboriginal cultural practices in family life and childrearing. S. Lohoar, N. Butera and E. Kennedy CFCA Paper No. 25 September 2014 AIFS

⁷ *Human Dignity and Children: Operationalizing a Human Rights Concept*. Polonko K. A. & Lombardo L.X. Department of Sociology and Criminal Justice Old Dominion University Norfolk, Virginia, USA. P1

demonstrate the standards are being applied in practice within services. A lack of ongoing training and understanding of how trauma may manifest in a child often results in uninformed and inadequate responses by either workers or the broader system adding to the existing trauma and the child's sense of feeling unsafe.

The recruitment, selection and appointment of people who bring the right set of values, who can empathise with children and young people, show compassion, negotiate responsible and reasonable boundaries and resolve conflict are some of the values staff need in order for children to feel safe. Child safe standards that apply from the commencement of recruitment can be useful when those standards are used to underpin the selection processes. For example, when applicants are required to demonstrate behaviours and actions that are consistent with the standards.

We note too that the Royal Commission emphasises the importance of appropriate advertising, recruitment, selection induction, processes that include behavioural standards training and support for staff working with children accompanied by comprehensive policies and procedures that address child safety⁸. Although the standards refer to values based recruitment, further emphasis on staff selection is required, for example asking specific child and youth safe questions in interviews.

15. Child safe standards need to apply to all organisations and institutions that come into significant contact with children and young people. WACOSS is concerned that an approach that relies on a voluntary system of registration, or focuses compliance activities through State Government service contracts does not have sufficient reach to keep all children safe in WA. Independent private and community organisations, such as sporting and cultural clubs or ballet schools, have significant levels of contact with children and young people where they can be placed at risk. Legislation may be required to ensure all relevant private and civil society institutions are also covered.

We acknowledge that it may take time and resources for independent organisations and institutions to understand and implement relevant child safe standards and practices. This may require a strong statement of commitment from Government and a target compliance date with sufficient lead time, complimented by a flexible outreach and support strategy to support understanding and implementation.

CCYP Report: *Oversight of services for children and young people in Western Australia*. Some additional considerations.

A single oversight body:

WACOSS acknowledges the comprehensive nature of the Commissioner for Children and Young People's Report *Oversight of services for children and young people in Western Australia*.⁹ We note that this report makes recommendations across a number of key government portfolio areas and that in doing so, provides a useful snapshot of the oversight landscape.

⁸ *Royal Commission of Inquiry into Institutional Child Sex Abuse*. Vol 6, page 181 Mr Marcus Erooga quote.

⁹ *Oversight of services for children and young people in Western Australia*. Commissioner for Children and Young People WA November 2017.

WACOSS agrees with the statement made in this report that: *previous inquiries have shown that independent oversight bodies are the most effective means of preventing abuse and maintaining high standards of care.*¹⁰

We also believe that multiple oversight bodies or systems are not in the best interests of children and young people, as each person's circumstances needs and are unique, and don't always fit neatly into government and non-government programs and services. Children's needs cannot be compartmentalised to suit the 'siloed' structures we have created through compartmentalised funding and contracting, and overlapping regulatory systems.

WACOSS recommends one oversight system capable of providing an overarching, holistic, flexible and accessible approach across a range of government and non-government jurisdictions and services. WACOSS does not recommend initiatives intended to enhance or 'work thru' existing oversight bodies or mechanisms. Various government statutory authorities often have separate governance and regulatory frameworks and may report to different Ministers. Reliance on existing public service agencies oversight mechanisms does not offer the level of accountability and transparency required to build trust across the community that children are being kept safe.

The multiple existing oversight mechanisms currently overlap, leave gaps and can be time consuming and daunting to access. More consideration needs to be given to how a single independent child safety oversight mechanisms will interact with existing reporting and accountability structures to ensure enhanced and coordinated accountability and reporting, rather than a confusion or diffusion of responsibility.

Preventative Oversight

WACOSS agrees with the views of the CCYP about the near absence of preventative oversight and monitoring in order to prevent abuse.

*"This lack of preventive monitoring is, in many respects, characteristic of Western Australia's oversight arrangements generally..... few Western Australian service providers are exposed to a wide-ranging regime of preventive oversight... the general lack of proactive individual advocacy can compromise their effectiveness, particularly with respect to organisations that provide services to or have frequent contact with vulnerable or disadvantaged children and young people."*¹¹

WACOSS is particularly concerned about children and young people who are not protected by enduring loving relationships from adults whom they trust. This is most likely to include children in the child protection and juvenile justice systems, homeless children and young people all of whom experience high-risk environments for abuse. WACOSS supports a trauma-informed, proactive oversight mechanism that is accessible to the most vulnerable cohort of children and young people growing up in statutory systems. It is imperative that individual advocacy is accessible to these children in order to prevent abuse.

Proactive approaches that could include independent visitors or advocates for children and young people in care or justice systems that are part of the overarching oversight body that can monitor compliance with child safe standards and take complaints from children and young people, are recommended.

¹⁰ Ibid p.2

¹¹ Ibid p1.

WACOSS supports a proactive system that includes a strong network of individual advocates that actively monitor the wellbeing of individual children in order to prevent abuse.

Response to the Royal Commission into Institutional Responses to Child Sexual Abuse.

We note the State Government response to date to the Royal Commission recommendations has focused in the first instance on priority responses to the National Redress Scheme and legislative change on civil liability for historical sexual abuse, as well as a public apology from the Premier for those experiencing abuse in Government Institutions. An implementation framework has been created and a *2018 Progress Report* provided with a focus on next steps.

WACOSS and members of our Children's Policy Advisory Committee attended the recent update forum provided to the sector by the Minister, Department of Premier and Cabinet, and Department of Communities on 25th February. At the forum we raised the issue of the recommendations from the Royal Commission relating to an independent oversight body responsible for monitoring and enforcing child safe standards. The initial focus of the WA Government has been firstly on the development and implementation of policy and associated training within Government departments and institutions, as reflected in the first progress report. The work plan going forward and response to the questions around implementation highlighted a focus on implementation of child safe standards being included as contractual requirements within State service contracts.

Concern was expressed at the forum about the need to move beyond a reliance on voluntary child safe standards and look to State regulation that would equally apply to institutions with significant contact with and responsibility for the wellbeing of children who are not reliant on State funding or not otherwise governed by service contracts – for example ballet schools, scouts, sporting or social clubs. A proactive example was also given of an aged care service provider who has developed child safe policy, standards and training because of the frequent presence of young children within their services. This is a service type that is not delivering services directly to children and might not expect to either have state contracts or to have child safety highlighted in their service model and contractual arrangements.

This is why we believe consideration needs to be given to State legislation and regulation that applies to all institutions where children are present and potentially at risk, not simply those with state contracts or identified specifically as providers of services to children.

Concluding Remarks:

The implementation of Child Safe Standards requires a comprehensive process for systemic oversight, monitored by a single independent body that can ensure the safety of children and young people, gives them a voice and hears their grievances, and advocates on their behalf. A child and youth focused complaints handling process with individual advocacy, including the opportunity to seek redress, is vital. The system should be co-designed in partnership with children and young people, service providers and Aboriginal leaders and communities.

The independent oversight mechanism needs to be adequately resourced to be effective, and have the capacity to make recommendations to the Parliament that are actionable.

Once children and young people have disclosed abuse and/or neglect it is essential that those children are supported through a process of healing, counselling, and/or therapy.

Oversight and analysis alone will not deliver better outcomes for children and young people in WA in the absence of appropriate services and supports for the most vulnerable and disadvantaged. Reporting on child safety in WA needs to include consideration of the adequacy and effectiveness of the service and support system for those at risk and those who have experienced abuse.

The system will require strong leadership with statutory powers that ensure oversight is not compromised or 'hamstrung' by legal or bureaucratic impediments. Consideration will need to be given to ensuring the safety of children, while minimising the reporting burden of services and avoiding gaps and duplication in reporting. One comprehensive system of independent oversight for all children and young people is recommended. WACOSS supports the development, using a co-design process, of a Child Safe Standards Workforce Strategy.

We note that the process for reviewing or approving accreditation of services to children, both within the context of Child Safe Standards and more broadly, requires further exploration and discussion.

WACOSS strongly supports the implementation of an education and engagement strategy that influences communities' views about the value and status of children and establishes a broader culture shift around keeping children safe.

Appendix 1: CHILD SAFE STANDARDS

Standard 1: Child safety is embedded in organisational leadership, governance and culture.

Standard 2: Children participate in decisions affecting them and are taken seriously.

Standard 3: Families and communities are informed and involved.

Standard 4: Equity is upheld and diverse needs are taken into account.

Standard 5: People working with children are suitable and supported.

Standard 6: Processes to respond to complaints of child sexual abuse are child focused.

Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.

Standard 8: Physical and online environments minimise the opportunity for abuse to occur.

Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved.

Standard 10: Policies and procedures document how the organisation is child safe

Appendix 2: CHILDRENS POLICY COUNCIL CONSULTATION

Sub-group contributors to submission from the Children's Policy Advisory Council:

Anglicare WA
Communicare Inc
Goodstart Early Learning
Mission Australia
Parkerville Children and Youthcare Inc
Phoenix Support and Advocacy Service
UnitingCare West
Valuing Children Initiative
Youth Affairs Council WA
WA Council of Social Service

Full Children's Policy Advisory Council Membership:

Alliance for Children at Risk / MercyCare
Anglicare WA
Centrecare
Child Australia
Communicare Inc
Connecting Community for Kids
CREATE Foundation
Children's Youth and Family Agencies Association
Developmental Disability WA
FINWA (Family inclusion network WA)
Goodstart Early Learning
Key Assets
Life Without Barriers
Mackillop Family Services
Ngala
Phoenix Support and Advocacy Service Inc
Playgroup WA
Save the Children
Uniting Care West
Parkerville Child and Youth Care Inc
Wanslea Community Services
Youth Affairs Council WA
YMCA WA
Parkerville Children and Youth Care
WA Council of Social Service