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Reference: [REDACTED]

Committee Secretariat
Education, Arts and Communities Committee
George Street
BRISBANE QLD 4001

Via email: [REDACTED]

Dear Committee Secretariat

The Queensland Family and Child Commission (QFCC) appreciates the opportunity to provide feedback on the *Education (General Provisions) Amendment Bill 2025* (the Bill). The proposed amendments align with the QFCC's legislated responsibilities to improve the child protection system and to advocate for the rights and welfare of children, particularly those who are vulnerable. I welcome the Bill's focus on inclusivity, including the removal of gendered language and the improvements to home education regulations. These reforms reflect a commitment to diversity and equality, ensuring that all children, regardless of their background or circumstances, can access an education system that respects and supports their rights and identities.

Mandatory Transfer Notes and Principal Powers

The QFCC supports the proposed introduction of mandatory transfer notes for students transitioning between Queensland schools, which is especially crucial for children in out-of-home care (OOHC) who may experience frequent enrolment changes due to placement movements. Mandating that key details such as educational performance, support needs, behavioural issues, and custody/guardianship orders are transferred provides for schools to be better equipped to provide continuity of education.

The proposed amendments align with the recommendations from the Child Death Review Board (the Board) in its 2023-24 annual report¹. The Board highlighted the need for systemic data-sharing processes between key agencies, such as the Queensland Police Service, the Department of Child Safety, and schools, to support vulnerable students. The proposed amendments contribute to this recommendation, particularly in the regulation of home education and the inclusion of support for children with complex needs. The QFCC also supports the amendments that enhance the use of approved online services in state schools,

¹ Child Death Review Board, Queensland Family and Child Commission (2023). *Annual report 2023-24*.
<https://www.qfcc.qld.gov.au/sites/default/files/2025-02/Child%20Death%20Review%20Board%20Annual%20Report%202023-24.pdf>

ensuring the protection of student data and privacy while facilitating efficient data management. The proposed amendments will simplify the process for transfer of enrolment between state special schools, reducing administrative delays and helping to ensure that students with disabilities experience smoother transitions to schools that can meet their specific educational needs. This change will lessen the burden on principals, parents, and students, facilitating more timely and appropriate placements.

Home Education

The QFCC supports the proposed extension of the age eligibility for home education registration to 31 December in the year the student turns 18. The extension of home education registration to the end of the calendar year in which a student turns 18 aligns the system with the age eligibility for students in state and non-state schools, offering greater flexibility for students, particularly those with complex learning needs. This reform will allow students to complete their final year of schooling in a manner that best suits their needs, which is especially important for those who may face challenges in traditional school settings or need additional time to reach academic milestones.

The QFCC's 2024 *Regulation of Home Education*² report highlighted critical gaps in the systems supporting home-educated children. In particular, the review revealed that while parents have the right to choose the most appropriate learning environment for their children, there are insufficient mechanisms to ensure the safety, wellbeing, and educational engagement of home-educated students. The review found that 7 per cent of a random sample of 500 home-educated children were living in high-risk home environments, with issues such as domestic violence or child protection concerns. These findings underscore the importance of better data sharing between agencies, including the Home Education Unit, the Department of Education, the Department of Child Safety, Seniors and Disability Services, and the Queensland Police Service, to help identify potential safety risks early and provide timely support.

eKindy and Procedures

The QFCC supports provisions in the Bill that aim to enhance procedural fairness in disciplinary decisions, introduce student support plans, and simplify the enrolment process for students transferring to state special schools. These measures are critical for ensuring that vulnerable students, including those with complex needs or those in care, receive the necessary support to succeed in their educational journey. As highlighted in the 2024 *Growing Up in Queensland*³ report, vulnerable children often face significant barriers in accessing education. The reforms introduced by the Bill will help to overcome these barriers, ensuring that children are not only

² Queensland Family and Child Commission (2024). *Regulation of Home Education. Insights Paper*.

<https://www.qfcc.qld.gov.au/sites/default/files/2024-12/QFCC%20Regulation%20of%20Home%20Education%20in%20Queensland%20Insights%20Paper%200.pdf>

³ Queensland Family and Child Commission (2024). *Growing Up in Queensland: A story of child and family wellbeing*.

https://www.qfcc.qld.gov.au/sites/default/files/2024-02/9022_QFCC_Growing%20Up%20in%20Queensland.WCAG%20reading%20order_01%20COMPRESSED.pdf



supported but are given opportunities to thrive in a supportive, inclusive educational environment.

The *Growing Up in Queensland*⁴ report emphasises the importance of high-quality early childhood education in laying a strong foundation for children's social, cognitive, and emotional development. Kindergarten is more than just academic preparation; it fosters essential life skills such as social interaction, self-regulation, and problem-solving. For vulnerable children, access to quality early learning can provide critical support and access to secondary services⁵, helping to mitigate disadvantages children may be facing at home and ensuring they enter formal schooling with a stronger foundation for long-term success. The proposed amendments will further support these early learning opportunities and streamline pathways into education for vulnerable children, ultimately contributing to improved educational outcomes.

The proposed amendments align with the QFCC's ongoing commitment to ensuring that all children, regardless of their background or circumstances, can access high-quality education that meets their individual needs. The QFCC hopes that the proposed amendments will contribute to better outcomes for Queensland's most disadvantaged students as part of a broader commitment to educational equity, ensuring every child has the opportunity to achieve their full potential in a supportive, inclusive, and equitable educational environment.

If you have any queries in relation to this matter, please don't hesitate to contact me directly on [REDACTED] or via email at [REDACTED]

Yours sincerely

Luke Twyford
Principal Commissioner
Queensland Family and Child Commission
April 2025

⁴ Queensland Family and Child Commission (2024). *Growing Up in Queensland: A story of child and family wellbeing*. https://www.qfcc.qld.gov.au/sites/default/files/2024-02/9022_QFCC_Growing%20Up%20in%20Queensland.WCAG%20reading%20order_01%20COMPRESSED.pdf

⁵ Queensland Family and Child Commission (2023). *Lessons from the life-story timelines of 30 Queensland children who have died: A small sample review of commonalities in child and family trajectories considered at the Child Death Review Board*. [Lessons from the life-story timelines of 30 Queensland children who have died](#)

