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Consultation Team
Department of Social Services

Via email:

Dear Consultation Team

The Queensland Family and Child Commission (the Commission) welcomes the opportunity to contribute to the development of the Second Action Plans under *Safe and Supported: The National Framework for Protecting Australia's Children 2021–2031*.

Over the past four years, the Commission has published and commissioned many reviews into Queensland's child protection system. The voices and experiences of children in care, foster and kinship carers, parents, and the frontline workers responsible for protecting and supporting them have been heard and captured in our work. We have examined the circumstances of more than 1500 child deaths, many of whom were known to the child protection system and have provided several submissions and more than 3000 pages of evidence to the Queensland Commission of Inquiry into Child Protection.

A central and consistent theme across the Commission's work is that Australia's current child safety architecture remains fragmented, reactive, and insufficiently connected. Effective reform requires the development of a fully integrated, intelligence-led safeguarding system, underpinned by nationally consistent data, cross-sector information sharing, and strengthened worker screening and regulatory frameworks. This includes closing critical gaps that allow unsafe individuals to move between sectors undetected and establishing governance and accountability mechanisms at a national level to drive coordinated action.

The Commission has further emphasised that child sexual abuse must be addressed as a national, systemic issue, requiring coordinated legislative, policy, and operational reform across jurisdictions. This includes strengthening safeguarding obligations, improving child-centred disclosure and complaints mechanisms, enhancing national capability to detect and disrupt abuse, and establishing accessible, specialist supports for children and families.

Finally, across all reform domains, the Commission underscores the importance of genuine partnership with Aboriginal and Torres Strait Islander communities, including through community control, delegated authority, and the full implementation of the Aboriginal and Torres Strait Islander Child Placement Principle. Embedding cultural safety and supporting self-determination are essential to achieving improving outcomes for First Nations children.

Taken together, these priorities reinforce that the Second Action Plans under Safe and Supported must move beyond incremental reform to system-wide transformation, addressing the social drivers of harm, strengthening early support, and building an integrated national child safeguarding system that is accountable, data-informed, and centred on children's safety, wellbeing, and rights.

The evidence to support my responses to the questions posed by this consultation sit across scores of reports and submissions. To simply summarise these in response to such an important review would be an injustice. Copies of the following work of most relevance to the review have been attached:

- **Fixing the Foundations: Seven reset reforms for Queensland's Child Protection System:** The Commission's final submission to the Child Safety Commission of Inquiry proposes seven pillars for reform including prioritising efforts to keep families together, improving the quality of child protection investigations and case management, guaranteeing the quality of places where children in care live, improving the life outcomes of children in care, establishing a system capable of transformation and continuous improvement, reforming departmental structures to support quality and improvement, and strengthening oversight and accountability mechanisms
- **2025–26 Annual Report on the Performance of Queensland's child protection system:** The Commission's annual report on Queensland's performance against state and national goals for the child protection system, in line with its legislative requirement under s40 of the *Family and Child Commission Act 2014*.
- **In Plain Sight: Review into System Responses to Child Sexual Abuse:** This report is a product of a 12-month review completed by the Child Death Review Board which reviewed system responses to child sexual abuse using a convicted offender of child sexual abuse as a case study. Of particular relevance to this consultation are Part F (Preventing child sexual abuse) and Part G (Safeguarding the future).
- **Submission to the Second Action Plans under the National Plan to End Violence against Women and Children 2022–2032:** Of relevance to this consultation, the submission calls for earlier intervention, integrated systems to protect children and culturally safe assessment, genuine partnership with Aboriginal and Torres Strait Islander organisations and explicit alignment with Our Ways – Strong Ways – Our Voices and Closing the Gap reforms.
- **Submission to the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030:** Of relevance to this consultation, the submission called for stronger national action, including integrated sharing of worker-screening, misconduct and safeguarding information, a Child Safeguarding Intelligence Hub to identify patterns of risk earlier, consistent safeguarding education across child-facing sectors and stronger organisational and leadership accountability.
- **Submission to the Select Committee on Intergenerational Housing Inequity in Australia:** The submission highlighted the existence of discusses fragmented policy settings, reactive rather than preventative investment and gaps in program design and delivery, leading to child protection and youth justice systems which are increasingly responding to issues fundamentally driven by housing instability and poverty.

- **2024–25 Child Death Review Board Annual Report:** This annual report provides an overview of key characteristics of the 64 children and young people whose cases are reviewed in the reporting period. The report examines several themes and service system issues relevant to this consultation, including early intervention, the need for interagency collaboration and information sharing, barriers to service access in remote communities and highly mobile families and working with families who are going through Sorry Business.
- **Too little, too late:** The Commission’s response to the implementation of the Residential Care Roadmap. I particularly draw attention to the *Residential Care Expert Advisory Council workshops* section which amplifies the views of young people with a lived or living experience of the residential care system. Further lived experience anecdotes can be found in related reports – “I was raised by a checklist”, “I Became My Own Carer”, and Treated as Broken.

Meaningful reform requires cultural as well as structural change—supported by better data, transparency, and sustained investment—to create a system that is responsive, accountable, and capable of improving long-term outcomes for all vulnerable children and families. If you would like to discuss this matter further, please don’t hesitate to contact me directly on xxxx xxx xxx or via email at xx@qfcc.qld.gov.au.

Yours sincerely

Luke Twyford

Principal Commissioner

Queensland Family and Child Commission

30 September 2026