

Commission of Inquiry into Queensland's child safety system

Submission – July 2025



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Acknowledgement of Country

SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

Background

SSI welcomes the opportunity to provide this submission to the Independent Commission of Inquiry into Child Safety System in Queensland (the Inquiry).

SSI is a national not-for-profit organisation that delivers a range of human services that connect individuals, families, and children from diverse backgrounds with opportunities – including settlement support, disability inclusion programs, community engagement initiatives and training and employment pathways. At the heart of everything we do is a drive for equality, empathy, and celebration of every individual.

SSI was founded in Sydney in 2000 with the aim of helping newly arrived refugees settle in Australia. Over time, our expertise in working with people from diverse cultural and linguistic backgrounds served as the foundation for a gradual expansion into other social services and geographical areas.

In 2018, SSI merged with the Queensland-based Access Community Services, and in 2019 opened in Victoria, providing an extensive footprint across the eastern coast of Australia. In 2023-24, SSI supported more than 60,000 people across almost 60 programs and community-based services nationally. We are also a leading provider of evidence-based insights into the social sector and are known as an organisation that can reach communities considered by many to be 'hard to reach'.

SSI has a track record of delivering culturally responsive and trauma informed support to children and families, particularly to migrants, refugees and others from culturally and linguistically diverse (CALD) backgrounds. We build trusted relationships with local communities, service providers and government agencies and employ a culturally diverse, multilingual workforce with deep community ties and lived experience.

With respect to child safety, SSI brings expertise and experience from the Multicultural Child and Family Program which has been delivering family preservation and restoration as well as foster and kinship care across New South Wales (NSW) for more than 10 years. In FY24, 295 children were supported in foster and kinship care with 24 children supported in family preservation and restoration.

We also deliver a range of child and family initiatives across Queensland. SSI is a partner in Logan Together, a place-based initiative with a focus on early childhood which was established in 2015. In addition, in May 2025, the Queensland Government approved SSI to deliver the Queensland Kin Care Program.

Culturally and linguistically diverse children have diverse strengths and barriers, which need to be considered across the policy, procedures and practices to strengthen child safety in Queensland. SSI welcomes the Commission of Inquiry's consideration of broader, long-term opportunities to improve models of care and support safer communities and SSI has directed its response to several of the Terms of Reference (b) to e) inclusive).

Summary of SSI Recommendations

SSI urges the Commission to make the following recommendations:

Recommendation 1:

The Queensland Government and associated child safety portfolio departments routinely collect data on the cultural background and language spoken by children, birth parents and carers. This would be consistent with the priority to improve data development and analysis under the National Framework for Protecting Australia's Children 2021-2031.

Recommendation 2:

The Queensland Government and associated child safety portfolio departments invest in scaling-up flexible, local, community-led and place-based initiatives in early intervention and expand community engagement with culturally diverse communities to deepen cultural safety and responsiveness in child safety initiatives.

Recommendation 3:

The Queensland Government build the capacity and capability of the child safety system workforce through investing in:

- the recruitment and retention of people from culturally and linguistically diverse backgrounds.
- upskilling the current workforce in culturally responsive practice.

Recommendation 4:

Where parental responsibility of a child is with the Department, that a wider set of practices are developed and implemented to ensure that children in care have opportunities to meaningfully maintain cultural connections. This would be consistent with the National Standards for Out-of-Home Care and Australia's international obligations to safeguard children's rights.

Recommendation 5:

The Queensland Parliament reforms the Child Protection Act 1999 and Adoption Act 2009 and associated regulations and departmental procedures and guidelines, to:

- incorporate flexible definitions of kin and family, and the ability to permit placements with extended or community kin where appropriate. The definition used in NSW should be considered.¹
- explicitly include a requirement for cultural care plans for non-Indigenous CALD children in care.
 - require the collection of indicators of cultural and linguistic background (e.g. language spoken at home, country of birth of parents) for all children in care, to inform policy, program design, and accountability.

Response to Terms of Reference

b) Fixing a broken system: reviewing the effectiveness of Queensland’s child safety system to keep children safe

An effective child safety system requires better data; a commitment to cultural safety and responsiveness; and a focus on prevention, early intervention and community engagement

Better data

The rate of children in Australia who are the subject of notifications for child safety concerns has increased from 49 to 53 per 1,000 between 2019-20 and 2023-24, while substantiations of maltreatment decreased from 8.7 per 1,000 to 7.3 per 1,000 in the same period.² Existing datasets collected by government and non-government agencies across Australia do not consistently capture indicators of the cultural and linguistic diversity of children in contact with child protection systems or in Out-of-Home Care (OOHC). This has flow-on effects on the design, implementation and funding of child safety systems, early intervention services and statutory care.

For example, national child safety notification data which is collated by the Australian Institute of Health and Welfare (AIHW) on behalf of Australian governments includes a breakdown of several important characteristics of children (e.g. Indigenous status, gender, age, socioeconomic background and location of residence) and types of maltreatment (e.g. emotional abuse, neglect, physical, sexual abuse). However, while the Royal Commission into Institutional Responses to Child Sexual Abuse recommended in 2017 that Australian governments should prioritise changes to the Child Protection National Minimum Data Set to include data identifying children from culturally and linguistically diverse backgrounds;³ to date, the annual child protection reports collated by the AIHW do not include this data.

Similarly, while the Queensland Government collates data for First Nations and some Pacific Islander children in statutory care, it does not include data on cultural and linguistic background for other children.⁴ This means that critical information on the cultural and linguistic diversity of non-Indigenous children who have been notified for a child protection concern or are living in care is not available to inform child safety systems and responses in Queensland. Accurate identification and documentation of the child’s cultural background is vital to ensure that appropriate services and supports can be provided and to inform the design and funding of early intervention, child protection and OOHC services.

Cultural safety and responsiveness

An effective child safety system needs to be culturally responsive and provide cultural safety for children at risk of harm including those from CALD backgrounds. Implementing culturally responsive practice in child protection and child safety systems requires changes at multiple levels including policy, organisational procedures and casework practices⁵ to improve engagement and relationships with children and families from culturally diverse backgrounds.⁶ These approaches involve a deeper consideration of ethnicity, faith, language, and settlement journey and involve working with interpreters, community leaders and/or bicultural workers. Culturally responsive training can also provide opportunities to enhance skills and competencies of the child safety workforce.

Prevention, early intervention and community engagement

Early intervention with vulnerable children prevents the escalation of issues and avoids more intensive and costly responses including OOHC, homelessness, disability and justice systems and has been shown to generate significant savings.⁷ Early intervention can take a range of forms such as parenting programs, family support, community hubs, and place-based initiatives.

Place-based initiatives are collaborative, long-term approaches to building thriving communities in a particular location and address a range of intersecting issues that draw on the strengths of the community. SSI is a partner in Logan Together which was established in 2015 and is an example of a place-based initiative focused on early childhood which is being implemented using a collective impact model. The success of Logan Together saw it receive funding in 2019 through Stronger Places, Stronger People which provided a 5-year funding agreement with the Australian and Queensland Governments.

A measure of the success of Logan Together as an established, place-based initiative is evidence of a 3.4 per cent reduction between 2015 and 2021 in developmental vulnerability in one or more domains among children in the pre-school years in Logan.⁸ Further, since 2019, the Walk Together initiative has focussed on child safety and protection in Logan.⁹

Walking together for Logan's Children Group – an example of Queensland-based innovation in child safety and development

The Walking together for Logan's Children Group (the Walk Together project) came together in 2019 when, after decades of investment in the child protection systems, it was clear that the system was not wrapping support around Logan families in ways that would best help them raise their children to thrive in life.

The Walk Together Project group convened and together invited Cultural Leaders, young people, families, and government and non-government partners, to sit together in Circle and on Country, to hear truths, build understandings and heal from the community's histories.

Over time there was a growing acknowledgement that child safety was everyone's responsibility. Together we identified what it would take to work differently for our children. While the collaboration started with First Nations communities in Logan, the opportunity for locally designed solutions began rippling out to Pasifika and CALD communities. Over time, the following changes unfolded:

- *Child safety practice shifted under a commitment to community leadership, wherein it was understood that:*
 - *no one has the right to 'offer authority' to community. Country has the authority and when Country is strong, community is strong.*
 - *every child should have a cultural plan.*
 - *they listen to, create a space for, and prioritise First Nations people always.*
 - *they preference community-led solutions owned by community.*
 - *cultural understanding is the responsibility of everyone, and both individuals and agencies need to invest in growing their cultural understanding and cultural responsiveness.*
 - *Different commissioning models with Child Safety were co-designed with community who already hold the relationships with First Nations, Pasifika and Multicultural communities.*

Following an ongoing dialogue and building relationships involving hundreds of Logan community members, there was a strong shared understanding of what Logan's children and families felt was most important for children to help them be happy, healthy and thriving in life.

To generate momentum and translate this in a way that further deepened community buy-in and engagement, a SPLASH! Event was held where this work, embodied in the community-led and robust Collective Plan, was launched.

This Collective Plan has been distilled into a Roadmap – organising community priorities by Australian Research Alliance for Children and Youth (ARACY) Nest domains across the life stages of a child. This Roadmap identifies what the community sees as key signs of success, and how to measure impact.¹⁰

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The Queensland Government and associated child safety portfolio departments routinely collect data on the cultural background and language spoken by children, birth parents and carers. This would be consistent with the priority to improve data development and analysis under the National Framework for Protecting Australia's Children 2021-2031.

Recommendation 2:

The Queensland Government and associated child safety portfolio departments invest in scaling-up flexible, local, community-led and place-based initiatives in early intervention and expand community engagement with culturally diverse communities to deepen cultural safety and responsiveness in child safety initiatives.

c) Safer Children: failures both systemic and policy that have impeded the ability of the Department responsible for the Child Safety portfolio (the Department) to provide support to families and protection to children at risk of harm in Queensland

The demography of Queensland is changing which requires all levels of the child safety system to prioritise and resource cultural safety and responsiveness

Queensland's child safety system needs to be culturally safe and culturally responsive to the diversity of the Queensland community, where about 2 in 5 were either born overseas or had a least one parent born overseas.¹¹ Correspondingly, the 2021 Australian Early Development Census (AEDC) reported that 16 per cent of children in their first year of full-time school were from CALD backgrounds in Queensland, up from 9 per cent in 2009.¹² Children and families from CALD backgrounds face additional challenges in child safety systems that demand tailored responses. These challenges can include disrupted social networks and loss of family supports due to migration, language difficulties, and cultural dislocation which may impact parenting in a new country. These require a tailored assessment and response that also addresses the child protection risk factors that are common across populations such as socio-economic disadvantage, parental and family mental health issues.¹³

In SSI's experience, the systemic and policy challenges of Departments responsible for child safety to support families and protect CALD children at risk of harm, are not unique to Queensland. These challenges include:

- A lack of substantial and sustained investment in culturally safe and community-led approaches, perpetuating a one-size-fits-all model that does not meet the needs of culturally diverse families.
- Insufficient recruitment and retention of a diverse workforce, limiting cultural understanding and trust-building with communities. Similarly, the existing workforce is not sufficiently resourced to build and maintain its cultural responsiveness capability.
- Limited research to guide practice for non-Indigenous children from culturally and linguistically diverse backgrounds in care, creating barriers to family preservation and reunification.
- Poor data and reporting on cultural and linguistic diversity, leading to blind spots in planning, decision making and accountability.
- System navigation and trust: Many families are unfamiliar with Australian child safety law and processes. The power imbalance between the child safety system and families creates fear and reluctance to engage, especially among people such as migrants and refugees, who have experienced persecution or lacked formal systems in their countries of origin. Correspondingly, there has been little support for families navigating the system, including those from CALD backgrounds.

Recommendation 3:

The Queensland Government build the capacity and capability of the child safety system workforce through investing in:

- the recruitment and retention of people from culturally and linguistically diverse backgrounds.
- upskilling the current workforce in culturally responsive practice.

d) Safer Communities: Evaluate the effectiveness of the Department as a corporate parent and whether it is able to meet community expectations around parenting

When parental responsibility is with the Department, policies and practices need to be improved to meet community expectations around effective corporate parenting

Children living in OOHC are at particular risk of poor life outcomes and there is limited research on the experiences of children from CALD backgrounds in care. One recent study examined the outcomes of CALD children participating in the Pathways of Care Longitudinal Study - a large study of children in OOHC being undertaken in NSW. It found that children from CALD

backgrounds had different child protection pathways with less reports of significant harm before entering care; that they were more likely to be placed in foster care; and were less likely than non-CALD children to have contact with both of their parents.¹⁴

The National Standards for Out-of-Home Care¹⁵ promote safety and stability for children in OOHC, acknowledging the importance of belonging and identity and include a requirement flowing from Australia's obligations as a party to the United Nations Convention on the Rights of the Child - Article 20 requires that all children in care be able to maintain connections to their culture, language, faith and community.¹⁶ This could involve, for example, maintaining children's connections to religious practices and spiritual traditions, participation in significant cultural events, culturally appropriate diet, customs around dress, hair care and grooming or having opportunities to learn or maintain a birth language.

A recent national study found that while there is limited research to guide practice on supporting cultural connections for non-Indigenous children from CALD backgrounds in care, a combination of practices can improve corporate parenting by Australian governments in their delivery of statutory care.¹⁷ The key practices include: respectfully engaging with children's family members in cultural care planning; coaching and supporting carers to promote cultural connections; integrating culture into life story work; and identifying cultural mentors for non-Indigenous CALD children in care.¹⁸

Recommendation 4:

Where parental responsibility of a child is with the Department, that a wider set of practices are developed and implemented to ensure that children in care have opportunities to meaningfully maintain cultural connections. This would be consistent with the National Standards for Out-of-Home Care and Australia's international obligations to safeguard children's rights.

e) Reviewing Queensland legislation about the protection of children, including the Child Protection Act 1999 and Adoption Act 2009

Reforming child safety legislation to deepen Australia's international commitment to children's rights

All state and territory governments, should strengthen policy and practice to uphold the right of children from CALD backgrounds in care to maintain connections to their cultural heritage.

Australia, as a signatory to United Nations Convention on the Rights of the Child, is required to uphold children's rights to protection and participation irrespective of their abilities, any other status or family background and uphold the right to grow within and practice their cultural, linguistic and religious traditions.¹⁹ The Convention further stipulates that for children unable to live with their birth family, they must be provided with alternative care that is continuous and respects the child's culture, language and religion. Importantly, Australian governments have a duty to ensure that all children in Australia enjoy the rights set out in the Convention, without discrimination of any kind.

A recent national study led by researchers at Western Sydney University, in which SSI was a partner,²⁰ reviewed current legislation, policies and strategies across jurisdictions in Australia to maintain cultural connections for children from non-Indigenous CALD backgrounds in OOHC. It

found that, while all state and territory laws make some reference to cultural rights, only New South Wales and Western Australia make specific reference to cultural care planning for non-Indigenous CALD children in OOHC.²¹

To support the improvements to Queensland's child safety system recommended in this submission, SSI recommends the following:

Recommendation 5:

The Queensland Parliament reforms the Child Protection Act 1999 and Adoption Act 2009 and associated regulations and departmental procedures and guidelines, to:

- **incorporate flexible definitions of kin and family, and the ability to permit placements with extended or community kin where appropriate. The definition used in NSW should be considered.²²**
- **explicitly include a requirement for cultural care plans for non-Indigenous CALD children in care.**
- **require the collection of indicators of cultural and linguistic background (e.g. language spoken at home, country of birth of parents) for all children in care, to inform policy, program design, and accountability.**

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Date: 28 July 2025

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