



Queensland Aboriginal and Torres Strait Islander  
Child Protection Peak Limited

# **Anchored in Culture, Driven by Community**

DECEMBER 2025

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## Acknowledgement of Country

Queensland Aboriginal and Torres Strait Islander Peak (QATSICPP) acknowledges the Traditional Custodians across all the lands that make up the State of Queensland. We acknowledge the oldest living cultures of Aboriginal and Torres Strait Islander peoples and the continued connections to Country, language and tradition. We pay our respect to Elders past and present and acknowledge future generations of Aboriginal and Torres Strait Islander children and young people and the bright future they will have.

# 1. Executive Summary

Aboriginal and Torres Strait Islander families and communities have nurtured children and young people in culture and strength for thousands of generations, and most continue to grow up safe and connected within their families today. Yet, Aboriginal and Torres Strait Islander children and young people remain disproportionately represented in Queensland's child protection system. More than a decade on from the Child Protection Commission of Inquiry (Carmody Inquiry), the system continues to be structurally misaligned with the cultural, legal and human rights of Aboriginal and Torres Strait Islander children, young people and families.

The absence of culturally anchored governance, inconsistent implementation of the Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP) and the underinvestment in community-controlled organisations have left critical gaps in accountability, transparency and outcomes. Without formal recognition and resourcing of peak-led leadership, the system risks perpetuating structural inequities and missing the opportunity to embed enduring, community-driven reform.

This submission responds directly to the Commission of Inquiry's Terms of Reference regarding the role of peak bodies in Queensland's child protection system. It outlines the unique and essential role of the Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP) and its member organisations in shaping, monitoring and reforming the system to make sure it is culturally strong, community-led and accountable to the members it serves.

QATSICPP is the recognised peak body for Aboriginal and Torres Strait Islander child protection services, and Youth Justice, in Queensland. It represents a network of 38-member community-controlled organisations, in addition to the over 54 organisations providing youth justice services across the state. QATSICPP provides strategic leadership, sector coordination and system accountability for cultural governance, based on member-led advocacy.

This submission highlights five core contributions of QATSICPP and its members:

1. *Cultural authority and sector leadership*: As the cultural anchor for reform, the stabilising reference point making sure Aboriginal and Torres Strait Islander worldviews, rights and governance remain central, QATSICPP makes sure these foundations are embedded in system design and oversight.
2. *Member-led reform*: QATSICPP's strength lies in its member network, community-controlled organisations that deliver culturally appropriate services and drive local solutions.
3. *Strategic influence and policy*: Through research, data analysis and by making sure our sector's unique knowledge and practice wisdoms inform and influence reform, QATSICPP influences legislation, investment and practice standards across government and non-government systems.
4. *Community-led oversight and cultural governance*: QATSICPP provides mechanisms for Aboriginal and Torres Strait Islander communities to shape and monitor reforms, making sure are culturally strong, transparent and responsive to lived experience.
5. *Data-informed sector insight*: By interpreting data through a cultural lens, QATSICPP highlights emerging trends and areas for improvement. This approach strengthens collective understanding of sector outcomes and supports reform efforts consistent with data sovereignty principles.

The submission also identifies key challenges that continue to constrain reform, including inconsistent ATSICPP implementation, underinvestment in ATSICCOs, lack of widespread and embedded cultural governance mechanisms and limited access to disaggregated data. These barriers must be addressed if Queensland is to deliver a child protection system that is safe, just and culturally responsive.

Key recommendations:

- ✓ Legislative recognition of peak bodies as essential partners in child protection governance
- ✓ Sustainable investment in peak functions, including strategic influence, member coordination, sector development and cultural oversight
- ✓ Partnership protocols to embed shared decision-making between government and peaks



- ✓ Data access and sovereignty to enable peaks to interpret system performance and highlight culturally informed reform opportunities
- ✓ Cultural governance mechanisms that privilege peak-led leadership and community accountability.

QATSICPP and its members are not stakeholders, they are rights-holders, cultural leaders and system partners. This submission calls for a recalibration of the child protection system that centres cultural authority, invests in community-led solutions and embeds enduring accountability to Aboriginal and Torres Strait Islander children, young people, families and communities.

## 2. Introduction

Anchored\* in culture and driven by community, the Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP) is Queensland's recognised peak body for Aboriginal and Torres Strait Islander child and family services. Established in 2009, it upholds the rights, safety and wellbeing of Aboriginal and Torres Strait Islander children, young people and families by leading the development of a culturally strong, community-led child protection system.

This submission addresses the Commission of Inquiry's Terms of Reference by demonstrating how QATSICPP provides cultural leadership, sector coordination and ensures accountability to Aboriginal and Torres Strait Islander communities through cultural governance.

In addition to its core child protection mandate, QATSICPP delivers the Queensland Youth Justice Peak, a newly established entity that provides strategic leadership, coordination and advocacy across the youth justice sector. The Youth Justice Peak represents all children and young people involved in the youth justice system and supports 54 organisations delivering 94 services across Queensland. This expanded role reflects QATSICPP's commitment to whole-of-system reform and its capacity to lead inclusive, cross-sector collaboration that improves outcomes for children and young people regardless of whether families have been here five years, five generations or 50,000 generations.

*\*Anchored refers to governance, leadership and reform that is firmly grounded in Aboriginal and Torres Strait Islander cultural authority, ensuring stability, legitimacy and accountability. To be anchored in culture is to embed community-defined values and rights as the immovable foundation for system design, oversight and transformation.*

### 2.1 QATSICPP's Mandate and Role

QATSICPP is the recognised peak body for Aboriginal and Torres Strait Islander child protection and youth justice in Queensland. Guided by cultural authority and community trust, its mandate is to make sure that systems affecting children, young people and families are culturally strong, community-led and accountable to Aboriginal and Torres Strait Islander peoples. Through representation, policy influence, sector coordination and cultural governance, QATSICPP provides the stabilising anchor that connects reform to the lived experience and rights of the communities it serves.

QATSICPP's mandate and role include:

- Representing Aboriginal and Torres Strait Islander child and family service providers and making sure their voices shape system reform
- Influencing policy, legislation and practice to embed cultural safety and responsiveness across child protection and youth justice systems
- Supporting inclusive, evidence-informed youth justice reform through the Queensland Youth Justice Peak, coordinating 54 organisations delivering 94 services statewide
- Building sector capability through workforce development, research and practice leadership, strengthening the sustainability of community-controlled organisations

- Promoting the implementation of the Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP) and the broader rights of children and young people to grow up safe, connected and supported in culture
- Providing strategic advice to government and system leaders, making sure reforms are informed by cultural authority and member-led expertise
- Leading sector-wide initiatives to improve practice, strengthen cultural safety and embed continuous improvement
- Facilitating knowledge exchange and collective leadership across its member network, ensuring community-defined standards guide reform
- Monitoring and responding to systemic issues affecting Aboriginal and Torres Strait Islander children, young people and families, ensuring accountability to community priorities.

Together these functions position QATSICPP as the cultural anchor and strategic leader for Aboriginal and Torres Strait Islander child protection and youth justice in Queensland.

## 2.2 Our ways of working

QATSICPP's leadership is grounded in the following values:

- *Self-determination*: Upholding the right of Aboriginal and Torres Strait Islander peoples to lead and shape the systems that affect their lives
- *Cultural integrity*: Embedding cultural knowledge, practices and leadership in all aspects of child protection
- *Collaboration*: Working in partnership with communities, member organisations, government and other stakeholders to achieve shared outcomes
- *Accountability*: Advocating for transparent, evidence-informed and outcomes-focused systems that serve children, young people and families with respect and dignity
- *Leadership*: Driving innovation, reform and excellence in Aboriginal and Torres Strait Islander child protection and broader youth justice policy and practice.

Through its work, QATSICPP continues to drive transformative change towards systems that are just, inclusive and responsive to the strengths and needs of all children young people and families.

## 3. Understanding Key Terms

Throughout this submission, QATSICPP uses terms that carry specific meaning within the Aboriginal and Torres Strait Islander child protection sector. These terms reflect the lived experience, cultural authority and practice wisdom of our member organisations, and are influenced by decades of advocacy, reform and community-led service delivery. While some terms may be used differently across government, academia or mainstream systems, this section outlines how QATSICPP defines and applies them, ensuring clarity, consistency and cultural integrity in our contributions to the Inquiry.

### 3.1 Cultural Safety

Cultural Safety is not a static definition or checklist, it is a lived experience, defined by Aboriginal and Torres Strait Islander peoples and grounded in their right to feel spiritually, socially, emotionally and physically safe in all interactions with systems and services<sup>1</sup>. There are many terms that are used in policy, legislation and practice, but essentially, it doesn't matter what term we use, it's what we mean by it. This submission refers to cultural safety as encompassing individual and institutional obligations, as well as enabling self-determination and the improved outcomes that arise when connection to culture is strong. Cultural safety has been informally described by community as simply the absence of racism.

The legislative evolution of cultural safety in Queensland marks a decisive shift from discretionary practice to enforceable obligation. Prior to 2023, cultural safety was referenced in sector-specific frameworks, particularly in health, education, and child protection, but lacked statutory force.

The *Public Sector Act 2022* (Qld), which commenced on 1 March 2023, introduced the first whole-of-government legislative framework requiring public sector entities to support a reframed relationship with Aboriginal and Torres Strait Islander peoples. While the Act does not define cultural safety, Section 21 (2) (c) explicitly requires reframing entities to promote cultural safety for Aboriginal and Torres Strait Islander peoples as part of the State's commitment to truth-telling, reconciliation and respectful engagement. This obligation is supported by Section 19, which requires the development of a culturally capable workforce and culturally safe workplaces, and Section 33, which imposes leadership duties to foster inclusive, respectful and culturally informed organisational cultures.

Although the Act embeds cultural safety as a statutory obligation, the absence of a consistent or operationalised definition across Queensland Government creates variability in interpretation and implementation. This legislative shift nonetheless requires agencies to embed culturally safe systems, policies and leadership accountability as part of their core public sector responsibilities.

The introduction of the *Child Safe Organisations Act 2024* (Qld) further strengthens Queensland's commitment to cultural safety, particularly for Aboriginal and Torres Strait Islander children and young people. Commencing from 1 October 2025, the Act mandates compliance with ten Child Safe Standards, including the Universal Principle, which requires organisations to create environments where children feel welcome, safe, valued, included and respected. While the Act does not define cultural safety, it embeds the concept through enforceable obligations that extend beyond cultural competence. Sector guidance from the Queensland Family and Child Commission (QFCC) reinforces that cultural safety involves recognising and protecting cultural identity, embedding culturally responsive governance and ensuring children and young peoples lived experiences are respected and upheld. As with the broader public sector, the absence of a consistent, legislated definition underscores the need for clear, context-specific operationalisation to ensure compliance and cultural integrity across diverse service systems.

In Queensland's child protection system, cultural safety must be understood as both a protective factor and a reform imperative. It is inseparable from self-determination and must be embedded in legislation, policy, practice, procurement and measurement systems. As Nooria, a young Aboriginal woman with lived experience powerfully stated:

*"The phrase cultural safety goes beyond awareness and sensitivity. To me, it means enriching cultural respect, values and understanding in an environment. It is beyond just tolerating, but it is celebrating and embracing. It goes beyond representation. To be culturally safe, I'd have no fear of judgement or discrimination. I know I'm culturally safe when my perspective and circumstances are reflected in policies, services and interactions."* <sup>ii</sup>

### 3.1.1 Principles of Cultural Safety

Drawing on national and international literature, QATSI CPP identifies the following core principles of cultural safety<sup>iii</sup>:

- *Reflexivity and Responsiveness*: Practitioners must understand their own cultural positioning and commit to ongoing learning and improvement
- *Systemic Commitment*: Cultural safety must be embedded in governance, leadership, staff training, anti-discriminatory policies and accountability mechanisms
- *Community-Led Definitions*: Cultural safety is defined by those receiving care, not by service providers. It must reflect local knowledges, histories, languages and protocols
- *Cultural Sovereignty and Self-Determination*: Aboriginal and Torres Strait Islander peoples must lead decisions, programs and policies that affect their children, young people and families.



### 3.1.2 Evidence of Impact

Research consistently affirms that cultural connection improves wellbeing<sup>iv</sup>. A 2017 systemic review found that cultural interventions, such as language learning, connection to Country and cultural expression, led to measurable health improvements<sup>v</sup>.

QATSICPP's own sector data shows that programs such as the Family Wellbeing Services (FWS) and Family Participation Programs (FPP), when culturally led and properly resourced, reduce statutory intervention and strengthen family outcomes.<sup>vi</sup>

### 3.1.3 Current Challenges

Despite legislative commitments, cultural safety remains inconsistently implemented across Queensland's child protection system. Key challenges include:

- Underutilisation of Aboriginal and Torres Strait Islander Community-Controlled Organisations (ATSICCOs) in prevention activities and decision-making
- Inconsistent application of the QATSICPP
- Limited investment in Independent Entities and cultural governance mechanisms
- Systemic breaches of cultural rights, including dislocation from kin and Country<sup>vii</sup>

### 3.1.4 QATSICPP's position

Cultural safety is not optional, it is an ethical and cultural obligation. QATSICPP's belief is that truly culturally safe services can only be delivered by ATSICCOs. Mainstream services may take steps toward cultural responsiveness, but the legacy of colonisation and assimilation demands a deeper structural shift.

To realise cultural safety in practice, Queensland must:

- Guarantee long-term investment in ATSICCOs ensuring they have the stability and resources to effectively deliver culturally safe services at scale
- Endorse QATSICPP's cultural governance model (see section Cultural Authority and Sector Leadership) and its role in embedding cultural safety
- Ensure that cultural safety is defined, led and evaluated by Aboriginal and Torres Strait Islander communities.

Only through these measures can the child protection system become a place where Aboriginal and Torres Strait Islander children and young people feel proud, safe, and connected, not just protected, but empowered.

## 3.2 Self-Determination

Self-determination is not a principle of consultation; it is a cultural and human right. For Aboriginal and Torres Strait Islander peoples, self-determination means having the authority to lead decisions that affect their children, young people, families and communities. In the context of child protection, it is the foundation for culturally safe systems, accountable governance and enduring reform.

In Queensland, self-determination is recognised in legislation, policy and national agreements. Section 5C of the *Child Protection Act 1999*<sup>viii</sup> affirms the right of Aboriginal and Torres Strait Islander peoples to self-determination, and the *Human Rights Act 2019*<sup>ix</sup> reinforces this through Section 28, which protects cultural rights including kinship, knowledge and connection to Country.

Despite these commitments, implementation remains inconsistent. QATSICPP continues to observe systemic failures where Aboriginal and Torres Strait Islander communities are excluded from decisions about their children and young people, particularly in early intervention, removal and reunification processes. These breaches are not just policy gaps; they are violations of cultural rights and of the legal obligations owed by government and statutory child protection authorities to Aboriginal and Torres Strait Islander peoples.

### 3.2.1 What Self-Determination Looks Like in Practice

Self-determination must be operationalised through structural mechanisms that embed Aboriginal and Torres Strait Islander voice and leadership in every level of the child protection system.

These mechanisms include:

- *Community-Controlled Decision-Making*: Aboriginal and Torres Strait Islander organisations must lead intervention planning, care decisions and service design, not be consulted after the fact
- *Delegated Authority*: As one pathway to self-determination, Delegated Authority enables the transfer of statutory child protection powers to ATSICCOs. This allows decisions to be made by those with cultural knowledge, kinship ties and community trust. While implementation is underway in Queensland, full realisation requires legislative commitment and reform, sustained investment and cultural governance structures to support decision-making at both case and system levels and release of power in decision-making by the department
- *Independent Entities*: Families must have access to culturally safe advocacy and support through independent Aboriginal and Torres Strait Islander entities
- *Cultural Governance*: Aboriginal and Torres Strait Islander peoples, individuals, families, organisations, specific roles (such as Cultural Practice Advisors) and other decision-making bodies must hold formal roles in oversight, planning and accountability. Cultural governance ensures that communities guide not only individual decisions but system-wide reform
- *Legislative and Funding Reform*: Self-determination must be embedded in law and resourced through long-term, guaranteed investment in both frontline services and peak functions.

### 3.2.2 Evidence of Impact

Research confirms that self-determination is the single most important factor in improving health and social outcomes for Indigenous peoples globally<sup>x</sup>.

### 3.2.3 QATSICPP's Position

Self-determination is foundational to effective outcomes and is not discretionary. It must be operationalised across all levels of the child protection system, from legislation and funding to practice and oversight. QATSICPP asserts that:

- Aboriginal and Torres Strait Islander peoples are rights-holders, not stakeholders
- Self-determination must be embedded, not aspirational
- Reform must be led by community, not imposed by system actors.

Only through genuine self-determination can Queensland build a child protection system that is culturally strong, accountable and capable of healing the legacy of harm.

## 4. Responding to the Terms of Reference: The role of QATSICPP and its members

### 4.1 Role of Peak

Peak bodies play a critical role in strengthening sectors, elevating member voices and shaping long-term reform. As the statewide peak for Aboriginal and Torres Strait Islander child and family wellbeing services, QATSICPP unifies the collective expertise and cultural authority of its members into a credible and respected voice that can influence policy, legislative reform and investment priorities at every level of government. Through this collective policy development and ability to envision and shape system reform, members are represented in key decision-making processes, so that reforms reflect community priorities and uphold the rights and aspirations of Aboriginal and Torres Strait Islander peoples.

QATSICPP also builds sector capability and service quality. It leads the development of practice standards, promotes continuous improvement and leads workforce planning and skills development initiatives that support a culturally strong, sustainable workforce. These efforts strengthen accountability, embed cultural integrity and support best practice across the community-controlled sector.

QATSICPP's role fosters innovation, collaboration and strategic risk management. Through its networks, Communities of Practice, workforce development activities, research and partnerships, the peak fosters shared learning, local solutions and sector-wide problem solving, helping organisations anticipate and respond to emerging challenges.

Most critically, QATSICPP provides a long-term strategic vision for the community-controlled sector in child protection. QATSICPP helps guide statewide priorities, amplify member voices and strengthen organisational capability, so that Aboriginal and Torres Strait Islander self-determination remains at the centre of system reform and ongoing delivery of the services that work best for communities.

### 4.2 Cultural Authority and Sector Leadership

Cultural governance is a structured approach to making sure that Aboriginal and Torres Strait Islander peoples lead decisions, monitor outcomes and hold systems accountable to cultural standards and community priorities.

At the core of QATSICPP's governance structure is its Board, comprised of representatives from ATSICCOs across the state. This collective governance approach ensures that regional voices and community perspectives shape statewide policy, advocacy and service reform. It reflects a commitment to member-led leadership, cultural legitimacy and sector-wide accountability.

QATSICPP's leadership and authority are centred in a cultural governance model that operationalises Aboriginal and Torres Strait Islander self-determination and community control across Queensland's child protection and youth justice systems. Cultural governance is not symbolic - it is inherent in Aboriginal and Torres Strait Islander ways of working, it is a structural mechanism that embeds cultural authority in system design, oversight and reform. It makes sure that cultural governance is further enacted through the leadership of Aboriginal and Torres Strait Islander peoples, individuals, families, organisations, specific roles (such as Cultural Practice Advisors) and other decision-making bodies. These roles are not advisory, they are authoritative.

QATSICPP's member organisations also play a critical role in cultural governance. Through elected Aboriginal and Torres Strait Islander committees, members oversee quality assurance processes, drive continuous improvement and ensure that services remain culturally safe and responsive. This governance model privileges community accountability over bureaucratic compliance and strengthens trust between families and service systems.

Cultural governance extends beyond the child protection system to youth justice and broader social policy domains. QATSICPP advocates for culturally governed responses to youth offending, including justice reinvestment, therapeutic programs and restorative practices led by ATSICCOs. It also leads policy reform, legislative advocacy

and system monitoring in partnership with government making sure that cultural authority is embedded in every level of decision-making.

Through this governance model, QATSICPP provides a unifying and authoritative voice for Aboriginal and Torres Strait Islander child and family wellbeing services across Queensland. Cultural governance is the foundation of reform, it makes sure that systems are not only culturally informed but culturally led.

### **4.3 Member-Led Reform**

QATSICPP's strength lies in its extensive network of ATSICCOs, which drive reform through innovation, collaboration and cultural leadership. These members hold deep connections to community and bring forward local solutions that are responsive to the specific needs of Aboriginal and Torres Strait Islander children, young people and families. Through shared learning, peer support and collective advocacy, the network delivers services that reflect community values while improving outcomes across the child protection and family support systems.

The member network contributes to reform by leading culturally appropriate initiatives that demonstrate the value of community-controlled service delivery. Across Queensland, member organisations deliver culturally grounded services such as the Waijungbah Jarjums midwifery model and the HALT Collective's early intervention partnership. These initiatives exemplify the strength of community-led design and collaboration in improving outcomes.

Member organisations have also led reforms that strengthen family and kinship connections. Through kin finding, member organisations are increasing the number of kinship carers and building community capacity to support children within their cultural networks. This approach reflects the commitment of QATSICPP members to keeping children connected to family, culture and Country.

Continuous learning and adaptation are central to the network's reform efforts. Member organisations collect feedback and qualitative data from communities to refine their practices. This process promotes innovation based on lived experience and fosters accountability to families rather than systems alone.

Cultural safety and local leadership are embedded within member-led practice through the involvement of Elders and practitioners who are part of their communities and who provide guidance on maintaining cultural integrity and relevance across services. Their participation helps strengthen trust between families and service providers and supports the development of community-driven solutions that reflect local priorities.

Collectively, these examples demonstrate how QATSICPP's member network is transforming the child and family support system through local innovation, culturally informed practice and shared responsibility. By leading reform from within their communities, members are achieving tangible improvements in family wellbeing, cultural connection and outcomes for Aboriginal and Torres Strait Islander children and young people across Queensland.

### **4.4 Strategic Influence and System Advocacy**

QATSICPP plays a central role in shaping policy, legislation and investment priorities that affect Aboriginal and Torres Strait Islander children, young people and families in Queensland. Through consistent advocacy, collaboration and sector leadership, QATSICPP has influenced major reforms that embed self-determination, strengthen the community-controlled sector and promote culturally responsive approaches within the child protection system.

A key achievement has been QATSICPP's long-standing advocacy for the ATSICPP, which is enshrined in the *Child Protection Act 1999* and strengthened through 2019 amendments to enable the delegation of statutory functions to ATSICCOs. This reform was one of the key recommendations made by the Royal Commission of Inquiry into Aboriginal Deaths in Custody and was further supported by recommendations the 1997 Bring Them Home Report following the National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children From their Families<sup>xi</sup>, marking a major shift toward community decision-making and cultural authority in child protection. Building on this foundation, QATSICPP co-designed with the Department of Child Safety, the Delegated Authority Implementation Plan, which outlines the transfer of a range of decision-making powers to ATSICCOs by 2032. This plan represents a critical pathway for embedding local governance and accountability across the system.

QATSICPP also played an influential role in the introduction of Cultural Recognition Orders through the *Meriba Omasker Kaziw Kazipa Act 2020*. These orders provide a culturally appropriate legal framework for recognising Torres Strait Islander customary child-rearing practices, advancing cultural continuity and affirming the rights of families to maintain their cultural identity and practice custom within the child protection system.

Beyond legislative influence, QATSICPP has shaped whole-of-government long-term system vision through its leadership in the development of *Our Way: A generational strategy for Aboriginal and Torres Strait Islander children and families*. Co-designed between the Queensland Government and ATSICCO's, led by QATSICPP and Family Matters, the *Our Way* sets a 20-year horizon to ensure all Aboriginal and Torres Strait Islander children and young people in Queensland grow up safe and cared for in family, community and culture.

QATSICPP's strategic leadership extends to improving sector capability and investment in community-controlled service delivery. Through its Practice Standards and Supervision Framework, QATSICPP promotes service standards, and capacity building across its member network. These efforts strengthen accountability, service quality and cultural responsiveness, supporting organisations to lead reforms from within their communities.

As part of its sector development leadership, QATSICPP has championed initiatives that build a sustainable Aboriginal and Torres Strait Islander workforce across child and family services. This includes partnerships with education and training providers to create career pathways, investment in trauma-informed practice and cultural capability programs and advocacy for funding that supports the transition of statutory and service functions to community-controlled organisations.

Through submissions, policy engagement and direct collaboration with government, QATSICPP continues to lead transformative system reform. Its advocacy prioritises equitable investment, community-led service design and legislative change that upholds the rights, voices and aspirations of Aboriginal and Torres Strait Islander children, young people, families and communities across Queensland.

## **4.5 Accountability and Oversight**

QATSICPP's accountability and oversight approach places community leadership and transparent governance at its core. Through culturally responsive structures and participatory processes, QATSICPP maintains a clear line of sight across reform implementation, system performance and sector development outcomes.

QATSICPP provides community-led oversight by embedding local governance mechanisms within reform processes. The implementation of Delegated Authority is central to this approach, allowing ATSICCOs to assume decision-making powers in child protection matters. This transition strengthens local accountability and enables communities to directly monitor and influence outcomes for their children and families.

Community feedback mechanisms such as Yarning Circles, communities of practice and peer networks provide regular opportunities for dialogue between QATSICPP, member organisations and community members. These forums facilitate open discussion on workforce development, cultural training and service delivery, creating an avenue for continuous reflection and reform monitoring. Insights gathered through these conversations directly inform the evolution of QATSICPP's advocacy, strategies and policy positions.

At the organisational level, QATSICPP's Board oversees strategic direction and resource allocation in line with its constitutional objectives. This structure reinforces transparent governance and collective responsibility across all member organisations.

Transparency and responsiveness are maintained through strong partnerships and collaboration with government, sector leaders, and community-controlled organisations. These relationships allow for shared monitoring of reform implementation and promote the ongoing refinement of policy and practice.

Through these interconnected mechanisms such as community-led oversight, governance structures, evaluation frameworks and participatory feedback processes, QATSICPP upholds transparency, accountability and responsiveness across all levels of its work. This approach reflects a commitment to community empowerment and

the continuous improvement of systems that affect Aboriginal and Torres Strait Islander children, young people and families.

## 4.6 Data-Informed Governance and Impact Analysis

QATSICPP's governance and advocacy are shaped by a strong commitment to data sovereignty, sector voice and intelligence and evidence-based practice. The organisation's approach recognises that data is a powerful tool for community empowerment and policy influence when Aboriginal and Torres Strait Islander peoples have control over how it is collected, interpreted and used.

Central to this approach is the principle of data sovereignty, which positions Aboriginal and Torres Strait Islander communities as the rightful custodians of their information. QATSICPP recommends shared access to locally relevant data, enabling communities to develop and monitor their own implementation strategies. This shared control fosters targeted responses to community priorities and strengthens the evidence base that guides both local decision-making and system-level recommendations.

Through a community-controlled approach to data use, QATSICPP collaborates with ATSICCOs to collect and interpret data that reflects lived experiences and cultural perspectives. This partnership strengthens the reliability and relevance of evidence used to advocate for reform, while also reinforcing self-determination.

The organisation's Monitoring and Evaluation Framework provides the structure for continuous data collection and analysis. It uses quantitative indicators drawn from qualitative insights provided through community engagement, helping to assess outcomes.

Communities of Practice (CoP) play a vital role in translating data into shared learning and sector development. These forums bring together practitioners from across ATSICCOs to reflect on progress, discuss barriers and enablers to implementation, and identify opportunities for innovation. Action learning cycles within CoPs allow participants to adapt their approaches in response to emerging evidence, supporting continuous improvement across the sector.

Insights from thematic surveys and member reporting provide additional layers of intelligence for system monitoring and impact assessment. Thematic surveys explore key areas such as workforce capability, Delegated Authority implementation and community outcomes, generating evidence that highlights systemic challenges and successes. Member reporting, meanwhile, creates a process for input into planning, funding priorities and quality enhancement. Each member organisation contributes to QATSICPP's governance by sharing data and reflections on their operational and community experiences, which directly inform collective policy positions and advocacy efforts.

These processes are complemented by strong feedback and culturally safe mechanisms such as Yarning Circles, where community perspectives are shared on program effectiveness and emerging needs.

## 5. The Role and Value of Peaks

### 5.1 Strategic Role of Peaks

Peak bodies are the cornerstone of Australia's governance and reform landscape. They provide sector leadership, cultural authority and operational coordination, making sure reforms are nationally aligned while responsive to local needs. Peaks exist across all industries – health, housing, legal services, education, child protection – and their collective value is recognised through the Coalition of Peaks, which partners with all Australian governments under the Closing the Gap agreement.

For every industry, national and state peaks work in partnership to coordinate national frameworks while responding to local priorities. Mainstream peaks provide industry-wide coordination, while Aboriginal and Torres Strait Islander

peaks make sure reforms are culturally strong and community-led. Together, they form a sophisticated network that strengthens systems and delivers outcomes for communities.

Examples across industries include:

- Health: The National Aboriginal Community Controlled Health Organisation (NACCHO) works with state-based health peaks such as QAIHC in Queensland to coordinate national health reform while responding to state-based needs
- Housing: National and state peaks collaborate to influence housing policy and to ensure culturally appropriate responses to Aboriginal and Torres Strait Islander housing needs
- Legal Services: Aboriginal and Torres Strait Islander Legal Services are supported by peaks that strengthen sector capability and ensure culturally safe access to justice.

## 5.2 Child Protection Peaks

In child protection, Aboriginal and Torres Strait Islander peaks add strong value and leadership nationally, connected through SNAICC as the national voice. State and territory peaks provide localised leadership and reform coordination, including:

- Victoria: VACCA
- South Australia: Aboriginal Child Protection Peak
- Western Australia: Noongar Family Safety and Wellbeing Council
- Northern Territory: APONT and AMSANT
- Australian Capital Territory: Our Booris Our Way

Alongside Aboriginal and Torres Strait Islander peaks, QATSICPP also works collaboratively with mainstream child protection peaks such as PeakCare in Queensland, CREATE Foundation and Families Australia. These organisations bring complementary perspectives on system reform, advocacy for children and young people and sector capability. Together they form a broad network of child protection leadership that makes sure that reforms are coordinated, inclusive and responsive to the diverse needs of children, young people and families across Australia.

In Queensland, Aboriginal and Torres Strait Islander peaks across housing, health, legal and child protection work together to enable Closing the Gap. QATSICPP's role within this network is to provide cultural authority and sector leadership in child protection and youth justice, complementing the contributions of other peaks and strengthening the collective impact of Queensland's Aboriginal and Torres Strait Islander leadership.

QATSICPP's positioning enables the organisation to act as both a cultural and policy intermediary, so that ATSICCOs are central to decision-making processes that affect their children and families. While bodies such as SNAICC advocate at the national level, QATSICPP's jurisdictional focus allows it to drive on-the-ground implementation, workforce leadership, and systemic accountability in partnership with Queensland's government and sector stakeholders.

## 6. Clarifying the Core Functions and Reform Roles of QATSICPP and QFCC

Queensland's child protection system relies on multiple forms of oversight, leadership and accountability. QATSICPP and the Queensland Family and Child Commission (QFCC) both play essential roles, but they do so from different mandates, cultural foundations and legislative responsibilities. Understanding these distinctions is critical to making sure that reform is coherent, culturally strong and aligned with the rights and best interests of Aboriginal and Torres Strait Islander children and young people.

## 6.1 Distinct by Complementary Oversight Roles

Oversight is not a single function in Queensland, it is delivered through statutory oversight, cultural governance, community accountability and system advocacy. QATSI CPP and QFCC contribute to this ecosystem in different, complementary ways.

### 6.1.1 QFCC – Statutory, Child-Rights Oversight

QFCC's oversight role is established in legislation and is grounded in a child-rights framework. Its core accountability is to children and young people, particularly in upholding their rights, safety and best interests. QFCC exercises this mandate through:

- monitoring, review and reporting functions
- inquiries and systemic investigations
- submissions to parliamentary committees
- advice to government on structural reform
- promoting the participatory rights of children and young people
- education and regulatory functions under the *Child Safe Organisations Act 2024*.

QFCC's influence is strongest at the architecture level – identifying systemic risks, recommending legislative or policy changes, and strengthening the conditions that enable safe, rights-affirming systems.

### 6.1.2 QATSI CPP – Cultural Governance and Community-Led Accountability

QATSI CPP's oversight role is grounded in cultural authority, community trust and member-defined priorities. Its accountability is to Aboriginal and Torres Strait Islander children, young people, families and communities, expressed through:

- cultural governance mechanisms
- member-led system monitoring
- practice leadership and sector capability building
- community-defined standards of cultural safety
- advocacy for self-determination and QATSI CPP implementation
- interpreting system performance through a cultural lens.

QATSI CPP's oversight is not statutory – it is cultural, relational and informed by lived experience. It focuses on practice, commissioning, cultural integrity and community-led reform – areas where community-controlled leadership is essential and where QFCC has acknowledged it is not best placed to provide detailed advice.

Together, these roles form a dual accountability structure:

- QFCC ensures the system upholds the rights and best interests of all children and young people.
- QATSI CPP ensures the system is culturally strong, community-led and accountable to Aboriginal and Torres Strait Islander peoples.

## 6.2 Addressing Areas of Overlap and Legislative Misalignment

The Children's Commission has identified that the capacity-building function assigned to QFCC creates unnecessary duplication. This is a legislative design issue, not a conflict between agencies. Capacity building of the sector is a core function of a peak body, and QATSI CPP is best placed to lead:

- workforce development

- practice improvement
- cultural capability
- sector coordination
- commissioning and service design advice.

QFCC's role in capacity building is primarily educative, particularly under the *Child Safe Organisations Act 2024* where it supports organisations to understand and meet regulatory obligations. This is distinct from the sector-building role of a peak.

QATSICPP submits that legislative reform should:

- remove or refine QFCC's capacity-building function
- align functions with organisational expertise
- ensure peaks lead sector capability and cultural governance
- preserve QFCC's statutory oversight and child-rights education role

This alignment would strengthen the system and reduce duplication.

### 6.3 Shared Commitment to System Reform

Both QATSICPP and QFCC undertake system advocacy, but from different perspectives:

- QFCC advocates for structural reform that upholds children's rights and strengthens system safety.
- QATSICPP advocates for reforms that embed cultural authority, self-determination and community-led decision-making.

These roles are mutually reinforcing. QFCC's structural recommendations can create the enabling environment for cultural governance, while QATSICPP's cultural leadership makes sure reforms are grounded in community priorities and lived experience.

### 6.4 The Need for Clear, Legislated Partnership

The current system relies heavily on goodwill and policy-level commitments. To ensure enduring, accountable relationships between government, QFCC and Aboriginal and Torres Strait Islander peaks, Queensland must embed:

- partnership protocols
- cultural governance mechanisms
- legislated roles for peaks
- shared decision-making structures.

This would align Queensland with national commitments under the Closing the Gap Partnership Agreement, where governments and Aboriginal and Torres Strait Islander peaks work through formalised partnership arrangements to drive system reform.

## 7. Evidence and Member Contributions

### 7.1 Case Studies

#### 7.1.1 Delegated Authority

Delegated Authority represents a transformative step towards self-determination for Aboriginal and Torres Strait Islander communities in Queensland's child protection system. It shifts decision-making power from government departments to ATSICCOs and local leaders, enabling communities to take the lead in decisions that affect their children, young people and families.

At its core, Delegated Authority recognises the right of Aboriginal and Torres Strait Islander peoples to determine their own futures. It embeds cultural identity and belonging within child protection processes, so that decisions are supported by cultural knowledge, kinship systems and community values. The approach is supported by QATSICPP through advocacy, capacity building, policy development and partnership facilitation which means that ATSICCOs are equipped to assume and sustain their roles effectively.

Implementation of Delegated Authority relies on strong partnerships between ATSICCOs and the Department of Families, Seniors, Disability Services and Child Safety, adequate resource allocation and an ongoing commitment to evaluation and adaptation. Evaluations have found that when communities have greater control, the outcomes for Aboriginal and Torres Strait Islander children, young people and families improve significantly, resulting in more culturally relevant, responsive and effective services.

Early outcomes from Delegated Authority demonstrate:

- Enhanced community engagement and trust, as decision-making becomes locally driven and culturally competent
- Improved cultural competency and safety across the sector, fostering environments where families feel respected and supported
- Better outcomes for children and young people, including stronger connections to family, culture and Country, and increased success in family reunification efforts.

While challenges remain, Delegated Authority offers a powerful framework for rebalancing power and embedding cultural governance within the child protection system. This reform demonstrates how transferring power to communities creates lasting structural change.

#### 7.1.2 Aboriginal and Torres Strait Islander Child Placement Principle

The Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP) is a cornerstone of culturally safe child protection policy and practice in Queensland. The ATSICPP was legislated in the *Child Protection Act 1999*, as recommended by the Royal Commission of Inquiry into Aboriginal Deaths in Custody and the 1997 Bring Them Home Report following the National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children From their Families<sup>xii</sup>. The ATSICPP is built on five interconnected elements: prevention, partnership, connection, placement, and participation. These elements collectively uphold the rights of Aboriginal and Torres Strait Islander children to remain connected to family, community, culture and Country.

The principle reflects a fundamental shift toward self-determination, recognising that Aboriginal and Torres Strait Islander children and young people have the best opportunity to thrive when raised within their own cultural environments. Its implementation seeks to redress the historical impacts of child removal and means that culturally responsive practices guide all decisions and interventions affecting Aboriginal and Torres Strait Islander children, young people and families.

QATSICPP has played a pivotal role in embedding and strengthening the ATSICPP across Queensland. Much of the national policy, practice guidance and resource development attributed to SNAICC has been shaped and informed

through QATSICPP's expertise and leadership. This includes contributions to the Active Efforts Guide, which provides practical steps for practitioners so that there is compliance with the ATSI CPP and to operationalise its intent in everyday practice.

Through collaboration and capacity building, QATSICPP works alongside the Department of Child Safety and ATSI CCOs to promote consistent and meaningful application of the principle. QATSICPP supports ATSI CCOs to deliver family services, build workforce capability and strengthen their role in case decision-making so that children, young people and families have a genuine voice in processes that affect them.

Ongoing monitoring and evaluation are also central to QATSICPP's work, highlighting areas where implementation remains uneven and advocating for systemic reform. This includes pushing for sustained government commitment to active efforts that prioritise prevention, strengthen partnerships and uphold children's cultural connections.

SNAICC argues that the consistent and culturally informed application of the ATSI CPP leads to better outcomes such as reducing family separation, improving trust between communities and the child protection system, so that Aboriginal and Torres Strait Islander children and young people maintain strong cultural identities and a sense of belonging<sup>xiii</sup>.

Ultimately, the ATSI CPP embodies a child protection system centred in cultural integrity, community leadership and self-determination. QATSICPP's leadership in shaping, implementing and advocating for the principle demonstrates how community-controlled governance can transform policy into practice that genuinely serves Aboriginal and Torres Strait Islander children, young people and families.

### **7.1.3 Family-Led Decision-Making**

Family-Led Decision-Making (FLDM) represents a major reform in Queensland's child protection system, designed to strengthen family and community participation in decisions affecting Aboriginal and Torres Strait Islander children and young people. The model draws on traditional Indigenous consultative methods centred on collective discussion, respect and consensus so that families are empowered to take an active role in safeguarding their children and young people's wellbeing.

The FLDM approach marks a shift away from top-down, government-led decision-making towards a process centred in self-determination, cultural integrity and shared responsibility. Formal FLDM meetings bring together families, support workers and child protection representatives to identify solutions that prioritise the child or young person's safety, stability and family and cultural connection. These formal structures are complemented by more informal practices, such as yarning circles, which create culturally safe spaces for families to share their perspectives and make collaborative decisions.

QATSICPP has been instrumental in the rollout of FLDM across Queensland, advocating for a culturally led model and supporting ATSI CCOs to facilitate these processes. QATSICPP's leadership includes developing culturally centred frameworks and building practitioner capability so that family voices are central to decision-making. Its partnership work has shaped how cultural competence, family empowerment and accountability are embedded into the FLDM model.

Cultural competence remains a cornerstone of effective FLDM. Practitioners are encouraged to understand family histories, community dynamics and cultural values so that decisions are meaningful and contextually relevant. QATSICPP continues to drive workforce development and training initiatives that strengthen cultural safety and support ATSI CCOs to lead family engagement processes with confidence and integrity.

Evaluations of FLDM demonstrate several key benefits:

- *Empowerment and Self-Determination*: Families report feeling respected, heard, and involved in decisions that impact their children and young people
- *Stronger Family Connections*: FLDM helps identify kinship placements and community supports that enable children to remain connected to family, culture, and Country

- *Improved Trust and Collaboration:* The process enhances relationships between families, ATSCCOs, and government agencies, fostering shared accountability
- *Better Child, Young Person and Family Outcomes:* Increased cultural safety and family participation lead to more sustainable, less intrusive child protection responses.

QATSICPP's ongoing leadership ensures that FLDM continues to evolve as a culturally responsive, evidence-informed practice that honours Aboriginal and Torres Strait Islander ways of decision-making. Its leadership in embedding FLDM across Queensland's child protection system exemplifies how sector reform can align with cultural authority, strengthening both family capability and systemic accountability.

## 7.2 Sector Development

### 7.2.1 Workforce Strategy

QATSICPP is leading a significant sector development agenda through the rollout of its Aboriginal and Torres Strait Islander Community-Controlled Child and Family Sector Workforce Strategy (2025). The strategy establishes a long-term framework for building a strong, skilled and culturally responsive workforce that reflects and responds to the communities it serves. By investing in local capability, partnerships and workforce pathways, QATSICPP is strengthening the foundations of a sustainable, community-led child and family support system.

At the heart of the strategy is a commitment to recruitment, retention and advancement of Aboriginal and Torres Strait Islander workers. QATSICPP supports its member organisations to recruit locally, engage young people in community-based career pathways and share best practice approaches across the network. Tailored regional initiatives are also being developed to increase male participation and workforce diversity.

Accessible, culturally relevant education pathways are central to workforce capability. Through partnerships with universities, VET providers and government, QATSICPP is co-designing initiatives such as micro-credentials, Certificate IV pathways, "Train the Trainer" programs and the streamlined Recognition of Prior Learning (RPL) process. These efforts mean that existing skills and cultural knowledge are formally recognised, while new learning opportunities remain in community realities.

QATSICPP's Scholarship Program further strengthens the education-to-employment pipeline by removing financial barriers and connecting study directly with sector-based placements, mentoring and professional experience. This initiative builds confidence and career readiness among Aboriginal and Torres Strait Islander students, while contributing to the long-term leadership capacity of the sector.

The strategy also focuses on rural and remote workforce sustainability, recognising the unique challenges faced by ATSCCOs in these contexts. QATSICPP supports the development of Local Implementation Plans to identify workforce needs and local solutions, alongside networks for collaboration and resource sharing. This place-based, partnership-driven approach means that service delivery remains culturally strong and locally led.

Importantly, the workforce strategy embeds a phased implementation framework from immediate groundwork to medium- and long-term initiatives so that there is accountability, momentum and measurable progress. QATSICPP's leadership in coordinating these efforts reflects its broader role as the sector's peak body: building collective capability, embedding cultural authority, and making sure that Aboriginal and Torres Strait Islander voices continue to lead reform across the child and family system.

### 7.2.2 Scholarships

QATSICPP's scholarship initiatives form a key component of sector development, supporting the creation of sustainable educational pathways for Aboriginal and Torres Strait Islander students pursuing careers in child and family support services. The program focuses on increasing access to education, strengthening workforce capability and fostering a culturally competent sector.

Through collaboration with the Queensland Government and universities, QATSICPP works to expand opportunities for student placements, traineeships and scholarships that remove financial and structural barriers to participation. These initiatives are designed to create direct links between study and employment, offering practical experience and mentoring that build confidence and career readiness.

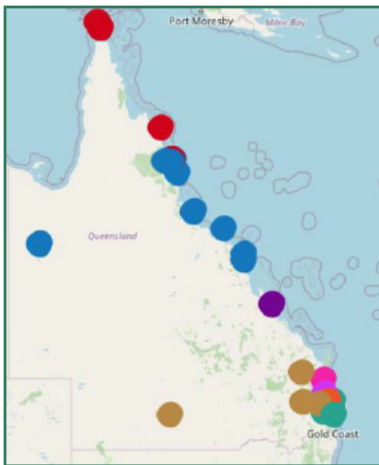
A central feature of the program is the Recognition of Prior Learning (RPL) framework, which acknowledges the formal and informal skills already held by Aboriginal and Torres Strait Islander peoples. This approach allows existing workers to convert their experience into recognised qualifications, providing clear pathways for professional growth.

The scholarship program also contributes to long-term educational pipelines, supporting tailored and stackable training pathways that connect school, tertiary study and employment. These pathways aim to build a highly skilled, culturally informed workforce capable of leading reform and delivering services that reflect the strengths and priorities of their communities.

Overall, the QATSICPP Scholarship Program strengthens both individual opportunity and collective sector capacity, supporting the next generation of Aboriginal and Torres Strait Islander professionals to lead in child and family support.

## 7.4 Data on Member Reach & Impact

QATSICPP has 38 members, providing over 80 services across Queensland.



12+ delegated authorities

17+ family participation programs, accounting for 100% of FPP services in QLD and offering support to approximately 1,450 families each year.

24+ family wellbeing services, accounting for 89% of FWS in QLD and offering support to approximately 4,900 families each year.

Additional services provided by members span across foster and kinship care services, education, employment, leadership, healthcare, domestic and family violence, mental health, community services, accommodation support, youth justice programs, NDIS support, residential care.

## 8. QATSICPP's role since the Carmody Inquiry

Since the 2013 Queensland Child Protection Commission of Inquiry (Carmody Inquiry), QATSICPP has played a central role in advancing culturally responsive, community-led reform across the child protection system. As the peak body representing ATSICCOs in Queensland, QATSICPP has worked to make sure that systemic change is grounded in the rights of First Nations children and young people to grow up safe, connected and cared for within their families, communities and cultures.

### 8.1 Key contributions

#### 8.1.1 Embedding the ATSI CPP

QATSICPP has led sustained advocacy and active partnership for the full implementation of all five elements of the ATSI CPP – prevention, partnership, placement, participation and connection. This work has not only shaped legislative reform, policy development and practice frameworks across government and non-government systems, but also involved collaborating with government on training, workforce development and program design to embed the ATSI CPP in practice.

#### 8.1.2 Strengthening the role of the ATSI CO's

QATSICPP has championed the expansion and resourcing of ATSI CO's to lead early intervention, family support and child protection services. This includes supporting the rollout of FPP, DA pilots and culturally responsive FWS.

#### 8.1.3 Embedding cultural governance

The organisation has consistently advocated for cultural governance mechanisms that uphold the self-determination of Aboriginal and Torres Strait Islander peoples. This includes shared decision-making panels, community-led oversight and the formal recognition of cultural authority in decisions affecting children and young people.

#### 8.1.4 Monitoring reform and elevating community voice

QATSICPP has played a critical role in monitoring the implementation of Carmody reforms through a cultural lens, identifying gaps, advocating for course correction and ensuring that lived experience informs systemic change. Through statewide consultations and member engagement, QATSICPP has amplified community voice in reform process.

#### 8.1.5 Building sector capability

QATSICPP has developed culturally informed practice frameworks, delivered workforce development initiatives and strengthened the cultural capability of both ATSI COs and mainstream services. This work has supported continuous improvement and built a more culturally safe and competent child protection workforce.

## 9. Challenges and Unfinished Reform

Despite significant progress since the Carmody Inquiry, QATSICPP continues to face systemic barriers that limit the full realisation of culturally safe, community-led child protection reform. These challenges reflect enduring structural inequities, fragmented implementation and a lack of sustained commitment to transformative change.

### 9.1 Key Challenges

#### 9.1.1 Inconsistent implementation of ATSI CPP

While the ATSI CPP is embedded in legislation, its application remains fragmented. Critical elements, particularly participation and partnership, are often poorly operationalised, not only through limited authority granted to

ATSICCO's, but also through inadequate and misdirected resourcing. Without appropriate investment to sustain kinship placements and support early intervention and reunification, these commitments break down and the ATSICPP is not upheld in practice.

### **9.1.2 Underinvestment in ATSICCOs**

Funding for ATSICCOs remains insufficient relative to the scale of overrepresentation and community need. Many organisations operate under short-term contracts with limited infrastructure support, constraining their ability to grow, innovate or influence systemic decisions.

### **9.1.3 Absence of cultural governance**

Cultural governance mechanisms are not embedded as core accountability structures within the child protection system. Shared decision-making panels and community-led oversight remain discretionary, inconsistently applied and vulnerable to shifting departmental priorities.

### **9.1.4 Data sovereignty and transparency gaps**

Communities lack access to timely, disaggregated data on Aboriginal and Torres Strait Islander children and young people in care. Government retains control over data systems, limiting transparency, community-led analysis and culturally informed accountability.

### **9.1.5 Workforce limitations**

While recruitment of Aboriginal and Torres Strait Islander staff has improved across both government and non-government sectors, retention and progression remain limited. Cultural capability training is often compliance-driven and fails to create meaningful shifts in institutional culture or frontline practice.

### **9.1.6 Fragmented reform accountability**

There is no coherent, culturally accountable framework to track progress against reform recommendations. Reform fatigue, shifting priorities and the absence of transparent monitoring have diluted momentum and obscured outcomes.

### **9.1.7 Limited influence in system design**

QATSICPP is often engaged late in policy development processes, limiting its ability to shape foundational decisions. Co-design is inconsistently applied, and power imbalances persist in government and community partnerships, undermining genuine collaboration.

## **10. System levers and reform opportunities**

To address the persistent challenges outlined in this submission, Queensland's child protection system must activate structural levers that embed cultural governance, elevate peak body leadership and ensure community-led accountability. These levers are not peripheral—they are essential to building a system that is safe, just and responsive to the rights of Aboriginal and Torres Strait Islander children, young people, families and communities.

### **10.1 Legislative Recognition of Peak Bodies**

Formal recognition of Aboriginal and Torres Strait Islander peak bodies in child protection legislation is critical. This includes embedding QATSICPP's role in governance, oversight and decision-making processes, making sure that cultural authority is not discretionary but mandated.

Legislative recognition of Aboriginal and Torres Strait Islander peak bodies is essential to embedding cultural authority, reform leadership and system accountability. While Queensland has made policy-level commitments to self-determination, these remain inconsistently implemented and lack statutory force. Other jurisdictions have taken steps to formalise the role of Aboriginal peak bodies in child protection governance. The following case study

from the Northern Territory demonstrates how legislative reform can embed peak-led leadership and cultural governance into the structure of the child protection system.

**CASE STUDY: Legislative Recognition of Peak Bodies – Learning from the Northern Territory**

The Royal Commission into the Protection and Detention of Children in the Northern Territory (2017) affirmed the critical role of Aboriginal organisations in child protection reform. It recommended that Aboriginal Peak Organisations NT (APO NT) and similar bodies be formally recognised in legislation and embedded in system governance, oversight and policy design. While this recommendation has not yet resulted in direct legislative recognition of a single peak body, the Northern Territory has taken steps to strengthen Aboriginal and Torres Strait Islander leadership through structured partnerships and legislative reform.

Recent amendments to the *Care and Protection of Children Act 2007* (NT) reflect a growing commitment to culturally responsive governance. These reforms support greater engagement with Aboriginal organisations in decision-making, planning and oversight, and respond to coronial findings that highlighted systemic failures in protecting Aboriginal children and young people. The NT model demonstrates how formal partnership protocols and legislative reform can work together to embed Aboriginal leadership in system architecture, even without naming a specific peak body in statute.

QATSICPP submits that Queensland must build on this precedent by legislating the role of Aboriginal and Torres Strait Islander peak bodies in child protection governance. This recognition must go beyond consultation, positioning peaks as rights-holders and co-governors with cultural authority and sector expertise. Formal legislative recognition would ensure that peak bodies are resourced and empowered to lead reform, monitor system performance and uphold cultural integrity across all levels of decision-making.

**Opportunity: Amend the *Child Protection Act 1999* to define and protect the role of Aboriginal and Torres Strait Islander peaks in system design, monitoring and reform.**

## 10.2 Investment Reform

Strategic investment is needed to support the full scope of peak body functions, advocacy, member coordination, sector development, cultural oversight and reform leadership. Funding must be long-term, flexible and aligned with the scale of overrepresentation.

Despite decades of inquiry and reform, Aboriginal and Torres Strait Islander children and young people remain significantly over-represented in Queensland's child protection system. This over-representation is not simply a failure of frontline services, it reflects systemic gaps in governance, accountability and cultural leadership. Yet, peak bodies such as QATSICPP remain under-resourced to lead the very reforms they are tasked with shaping.

QATSICPP submits that investment in peak functions must be recognised as a core system lever, not a discretionary or programmatic expense. This includes sustained funding for:

- Strategic policy leadership and reform design
- Sector-wide capability building and continuous improvement
- Monitoring, evaluation and thematic analysis of system performance
- Cultural governance, co-design and community engagement

- Development of tools, frameworks and practice guidance aligned to sector values.

Investment in peak functions is a structural response to over-representation. It ensures that Aboriginal and Torres Strait Islander communities are not only consulted but resourced to lead. It enables reform continuity, cultural accountability and sector-wide alignment, all of which are essential to reducing the disproportionate impact of the child protection system on our children and families.

**CASE STUDY:** Learning from the Canadian FNCFS Funding Overhaul

The long-running Canadian Human Rights Tribunal case on First Nations Child and Family Services demonstrates how systemic discrimination cannot be addressed without structural reform of funding arrangements. Tribunal findings confirmed that Canada’s previous funding model created adverse impacts for First Nations children, leading to chronic under-resourcing, gaps in service access and persistent inequities. In response, First Nations leadership, technical experts and the First Nations Child & Family Caring Society have worked to design a reformed funding system capable of preventing the recurrence of discrimination.

The Agreement in Principle (2021) committed \$19.807 billion over five years as baseline funding to address harms that were not resolved through earlier Tribunal orders. However, ongoing non-compliance (particularly in the implementation of Jordan’s Principle) demonstrated that one-off allocations and time-limited commitments are insufficient. In December 2023, the Caring Society brought a non-compliance motion after identifying serious harms arising from Canada’s failure to uphold Tribunal-mandated safeguards. This highlighted the limits of funding arrangements vulnerable to interpretation, political shifts and administrative discretion.

The proposed Reformed Funding Approach reflects a move toward transparent, multi-year, evidence-informed funding that is insulated from political fluctuations. Key features include block funding with flexibility and carry-forwards, calibrated funding adjustments based on population, inflation and community needs, and mandatory review mechanisms designed to detect and correct discriminatory impacts. Additional structural elements—such as Special Purpose Allotments, regional and national First Nations technical secretariats, and independent five-year public funding reviews—are intended to protect against regression and ensure that discrimination does not recur.<sup>xiv</sup>

This case demonstrates that investment reform must go beyond increases in funding levels. Structural changes, accountability mechanisms and long-term legislative protections are essential to safeguarding the rights and wellbeing of First Nations children. QATSICPP submits that Queensland should draw on these lessons by embedding secure, long-term funding arrangements for Aboriginal and Torres Strait Islander peak bodies. Recognising peak functions as core system levers rather than discretionary expenditures, would support the stability, authority and continuity required to lead reform, monitor system performance and uphold cultural governance across the child protection system.

**Opportunity:** Establish a dedicated funding stream for peak bodies, separate from service delivery, to support system-wide leadership and reform continuity.

### 10.3 Partnership Protocols

Clear, enforceable protocols are needed to guide how government departments engage with peak bodies. These protocols must embed shared decision-making, co-design principles, and cultural governance standards across all stages of policy and program development.

The national Closing the Gap agreement demonstrates that governments and Aboriginal and Torres Strait Islander peaks can work under formalised partnership arrangements. While the Agreement refers to partnership agreements and policy partnerships rather than protocols, the function is the same – they are structural tools that embed shared decision-making, co-design and accountability. Queensland embedding partnership protocols in legislation would align with this national precedent and make sure that commitments to child protection targets are delivered consistently and enduringly.

While Queensland has made policy-level commitments to self-determination and partnership, these remain inconsistently applied and vulnerable to shifts in leadership, priorities or departmental interpretation. QATSICPP submits that formal partnership protocols must be embedded in legislation and system architecture to ensure enduring, accountable relationships between government and Aboriginal and Torres Strait Islander peak bodies.

Partnership protocols are not symbolic. They are structural tools that define how decisions are made, how priorities are set, and how reform is governed. They clarify roles, responsibilities, and expectations making sure that Aboriginal and Torres Strait Islander communities are not merely consulted, but co-lead the design, delivery and evaluation of child protection systems.

#### **CASE STUDY:** Partnership Agreement – AbSec and NSW Government

In New South Wales, AbSec and the Department of Communities and Justice (DCJ) have established a formal Partnership Agreement that outlines shared governance arrangements, decision-making protocols and joint accountability mechanisms. This agreement includes defined roles for AbSec in policy development, reform oversight and system monitoring; joint planning forums and co-chaired governance structures; commitments to transparency, shared data access and cultural accountability; and mechanisms for dispute resolution and continuous improvement.

This model demonstrates how partnership protocols can move beyond consultation to embed Aboriginal leadership in system governance. Queensland must adopt a similar approach – legislating partnership protocols that recognise QATSICPP’s role as a co-governor, not a stakeholder.

**Opportunity:** Co-develop a statewide partnership framework between government and Aboriginal and Torres Strait Islander peaks, with accountability mechanisms and joint authority.

### 10.4 Data Access and Sovereignty

Peak bodies must have access to timely, disaggregated data to monitor system performance, identify gaps, and advocate for reform. Data sovereignty is essential to ensuring that analysis is culturally guided and community controlled.

Data access is not simply about information sharing, it is a structural lever for reform. When Aboriginal and Torres Strait Islander peak bodies are granted formal access to disaggregated child protection data, they are empowered

to monitor system performance, evaluate reform impact and uphold cultural accountability. Without this access, communities are excluded from the very evidence base that drives decisions about their children and families.

Data sovereignty affirms the right of Aboriginal and Torres Strait Islander peoples to determine how data is collected, stored, interpreted and used. It makes sure that evidence is not extracted or imposed, but informed by cultural knowledge, lived experience and community priorities. Embedding data sovereignty into system design is essential to self-determination and reform integrity.

Formal data access arrangements enable peak bodies to track trends, identify gaps and respond to emerging issues with agility and cultural insight. They support action learning cycles, thematic analysis and member-led evaluation, all of which are critical to reform continuity and system accountability.

Jurisdictions such as New South Wales have recognised this imperative by establishing formal data-sharing arrangements with Aboriginal peak bodies/organisations. These partnerships provide a precedent for Queensland to embed data access and sovereignty into legislation and system architecture.

#### **CASE STUDY:** Data Access and Reform Monitoring – New South Wales

Across jurisdictions, Aboriginal peak bodies are increasingly recognised as essential partners in system accountability, not only through consultation, but through formal access to data that enables reform monitoring, impact analysis and cultural oversight.

In New South Wales, AbSec has established formal data-sharing arrangements with the Department of Communities and Justice (DCJ). These agreements enable AbSec to access child protection and out-of-home care data to monitor system performance, inform policy reform and uphold cultural governance. This partnership reflects a growing recognition that Aboriginal peak bodies must be equipped with real-time, disaggregated data to lead reform and hold systems accountable.

This example demonstrate that data sovereignty and access are not aspirational, they are operational levers for reform. QATSICPP submits that Queensland must follow this precedent by embedding formal data access arrangements into legislation and partnership protocols, enabling peak bodies to monitor system performance, evaluate reform impact, and uphold cultural accountability.

#### **CASE STUDY:** Community-Controlled Data Governance – Learning from QAIHC’s Health Information Team

The Queensland Aboriginal and Islander Health Council (QAIHC) demonstrates how Aboriginal and Torres Strait Islander organisations can lead effective data governance when formally supported. Through its Health Information Team (HIT), established in 2007, QAIHC provides Community Controlled Health Services with structured data systems, reporting tools and workforce training.

HIT maintains Data Services Deeds and Data Governance Protocols that protect community information and ensure data is collected, stored and used in culturally appropriate ways. Regularly updated dashboards, clinical indicator reports and tailored data products enable services to track performance, identify issues and inform planning and advocacy.

This model shows how community-controlled data governance strengthens accountability and continuous improvement. QATSI CPP submits that Queensland should adopt similar principles in child protection by embedding formal data access and data sovereignty for peak bodies, ensuring culturally guided analysis and sector-led system monitoring.

#### **CASE STUDY: Missed Opportunities for Data Sovereignty in Delegated Authority (CQID)**

CQID's experience delivering the Delegated Authority demonstrates both the potential of the model and the systemic barriers that limit its full impact. Delegated Authority is designed to enable culturally led decision-making, yet the absence of real-time, consistent and complete data access prevents ATSI CCOs from exercising the full intent of the delegation.

CQID practitioners report that critical information, including safety concerns, reunification planning details, historical family mapping and placement history, is often delayed, incomplete or withheld. Delegated practitioners have, at times, been excluded from case planning meetings despite holding the appropriate delegations. These gaps create avoidable risks, undermine family trust and limit the ability of the ATSI CCO to make culturally informed decisions.

This is not simply a data-sharing issue, it is a missed opportunity for data sovereignty. If ATSI CCOs had full visibility of case information, automatic inclusion in departmental systems and access to historical and real-time data, Delegated Authority could operate as intended – culturally grounded, timely and responsive to children and young people's needs.

A data-sovereign approach would enable ATSI CCOs to:

- map kinship and cultural connections early and accurately
- identify patterns and risks through culturally informed lens
- support reunification and stability through better-informed decision-making
- build family trust through transparency and cultural accountability
- contribute to system-level insights that strengthen reform.

CQID's experience shows that when ATSI CCOs are empowered with the right information, Delegated Authority becomes a powerful mechanism for cultural safety, self-determination and better outcomes. When information is withheld, the model is constrained and the system misses the opportunity to realise its full potential.

**Opportunity: Establish data-sharing agreements and community-controlled reporting mechanisms that enable peaks to lead impact analysis and reform monitoring.**

## 10.5 Cultural Governance Mechanisms

Cultural governance must be embedded across the child protection system. This includes shared decision-making panels, regional oversight bodies and community-led review processes that privilege cultural authority.

While delegated authority enables Aboriginal and Torres Strait Islander community-controlled organisations (ATSICCOs) to make statutory decisions for individual children and families, cultural governance mechanisms operate at a broader level by centring culture and providing community-led oversight, strategic direction, and system accountability across regions and the entire child protection continuum.

Cultural governance is not simply about case-by-case decision-making. It is about embedding Aboriginal and Torres Strait Islander leadership into the architecture of the system itself. This includes formal roles for Elders, Cultural Practice Advisors, youth representatives and regional leaders in planning, monitoring, and reform evaluation. Cultural governance enables communities to shape priorities, interpret system performance through a cultural lens and guide investment and practice improvements in ways that uphold cultural standards and community-defined expectations for children's safety, belonging and wellbeing.

In jurisdictions such as the Northern Territory, legislative provisions under the *Care and Protection of Children Act 2007* (NT) enable Aboriginal organisations to assume delegated statutory functions, similar to provisions already available in Queensland. Following the Royal Commission into the Protection and Detention of Children (2017) recommendations were made for Aboriginal peak bodies to play a stronger role in system monitoring and policy design. While these reforms have been proposed, they have not been fully enacted. This highlights the needs for Queensland to move beyond policy-level commitments and embed cultural governance and partnership protocols in legislation, ensuring both delegated authority and regional reform leadership are consistently applied.

QATSICPP submits that cultural governance mechanisms must be embedded in Queensland's child protection legislation and system design. This includes:

- Statutory recognition of Aboriginal and Torres Strait Islander governance structures
- Formal roles for cultural leaders in oversight panels, planning forums and reform evaluation
- Co-governance protocols between government and peak bodies
- Cultural accountability embedded in funding, reporting and performance frameworks

Embedding cultural governance ensures that Aboriginal and Torres Strait Islander communities are not just involved in decisions – they are leading the system itself. It is a structural expression of self-determination, and a necessary lever for enduring reform.

**Opportunity: Mandate cultural governance structures in legislation and policy, supported by a statewide cultural governance model and resourcing for implementation across all regions.**

## 11. Conclusion and recommendations

QATSICPP submits that meaningful reform of Queensland's child protection system must be anchored in culture, driven by community and led by Aboriginal and Torres Strait Islander peoples. This submission has outlined the structural levers required to recalibrate the system including cultural governance, data sovereignty, investment reform and partnership protocols, and has demonstrated how QATSICPP and its member organisations are uniquely positioned to lead this transformation.

Throughout the submission, we have identified opportunities to embed cultural authority, strengthen community-led oversight and make sure that Aboriginal and Torres Strait Islander children, young people and families are not only protected, but empowered. These opportunities are explored in detail across the body of the submission and supported by case studies, member insights and sector evidence.

To support clarity and cohesion, QATSICPP's formal recommendations are consolidated below. These recommendations reflect the reform priorities outlined in the Executive Summary and are presented here as a foundation for enduring, community-led change.

## 11.1 QATSICPP's Recommendations

1. Legislative recognition of Aboriginal and Torres Strait Islander peak bodies as essential partners in child protection governance
2. Sustainable investment in peak functions, including strategic advocacy, member coordination, cultural oversight and reform monitoring
3. Formal partnership protocols to embed shared decision-making and co-governance between government and Aboriginal and Torres Strait Islander peaks
4. Data access and sovereignty to enable peak bodies to monitor system performance, evaluate reform impact and uphold cultural accountability
5. Embedding cultural governance mechanisms in legislation and system architecture to privilege Aboriginal and Torres Strait Islander leadership in oversight, planning and reform
6. Structural investment in community-controlled organisations to reduce over-representation and strengthen culturally safe early intervention and family support
7. Embedding cultural safety as a system-wide obligation, defined and led by Aboriginal and Torres Strait Islander communities
8. Operationalising self-determination across all levels of system design, funding, practice and accountability

QATSICPP approaches this Inquiry not as a stakeholder seeking inclusion, but as a system leader committed to transformation. The reform opportunities outlined in this submission reflect decades of advocacy, cultural leadership and community wisdom. They are not new ideas, they are long-standing calls for justice, accountability and structural change. As the Commission considers its findings, QATSICPP urges a shift from consultation to co-governance, from programmatic reform to systemic recalibration. Our children, young people and families deserve a system that reflects who they are, responds to what they need, and is led by those who know them best. The time for structural change is now, and QATSICPP stands ready to lead it.

## 12. Contact

For questions about this submission, please contact [REDACTED], DCEO Policy and Strategy on [REDACTED] or [REDACTED]

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