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25 March 2026

Dear Commissioner, Honourable Paul Anastassiou KC,

Re: Commission of Inquiry into Queensland's Child Safety System: Supporting Aboriginal Community-Controlled Organisations (ACCOs)

YFS acknowledges and pays respect to the Yuggera and Yugambah speaking peoples on the land we work alongside our First Nations colleagues and clients and make this submission.

YFS is not an Aboriginal Community Controlled Organisation (ACCO) and thus prior to making this submission, we have spoken with some of our local ACCO's we work alongside; - *Jinndi Mibunn* and *Gunya Meta*. Aunty Faith Green from *Gunya Meta* also suggested the Logan Local Decision Making Body funded by the Department of Women, Aboriginal and Torres Strait Islander Partnerships and Multiculturalism, would be supportive of this submission also.

We sought from *Jinndi Mibunn* and *Gunya Meta* guidance on the appropriateness and content of this submission to ensure we could lend our voice to the issues, context and challenges to improving the outcomes of children, young people and families of First Nation peoples in contact with the Child Protection system. They are supportive of the reflections and recommendations of this submission and thanked us for involving them.

YFS is committed to seeing the Closing of the Gap between First Nations peoples and non-Indigenous Australians in all areas of our society. It is unacceptable to YFS to not speak up when inequity is not addressed. We hope our contribution goes towards considerations for a different approach to supporting ACCO's in their vital roles in addressing the over representation of First Nations people with the Child Protection System.

Thank you for the opportunity to make a submission on this topic.

Sincerely



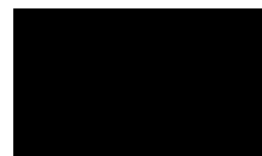
Christopher John

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Executive Summary

YFS Ltd is a placed-based community services organisation operating in Logan, Queensland, delivering integrated support to children, young people, and families experiencing vulnerability. Each year, YFS works with approximately 9,000 clients each year in the Logan region, 17% of whom are Aboriginal and Torres Strait Islander peoples. Through our delivery of family support, youth services, housing, legal assistance, and related services, YFS has witnessed first-hand the structural inequities and cumulative impacts faced by First Nations children and families in the child protection system. We welcome the Commission of Inquiry's focus on improving Queensland's child safety system and addressing the *overrepresentation* of Aboriginal and Torres Strait Islander children in out-of-home care.¹

This submission seeks to inform the Commission's recommendations by identifying reforms that are demonstrably necessary to achieve measurable and sustained reductions in the overrepresentation of First Nations children in the child protection system. It contends that without deliberate, sustained investment in Aboriginal Community Controlled Organisations (ACCOs), reforms to Queensland's child safety system will continue to underperform for First Nations children and families.

Our submission seeks to highlight that;

1. ACCOs are essential, not supplementary to achieving safe, effective, and culturally grounded preventative child protection outcomes for First Nations children and young people.
2. Existing funding, commissioning, and system design settings actively limit ACCO capacity, scale and influence; and
3. Enduring reform requires genuine partnership, delegated decision-making authority, and sustained long-term investment in ACCO capability and leadership.

Our focus is on ensuring that Queensland's child protection system, both Departmental and non-First Nations providers included, moves beyond respectful engagement with ACCOs, to instead position them as central, empowered and properly resourced leaders within the child safety system. This shift is essential if reforms are to meaningfully respond to the significant overrepresentation of First Nations children, young people, and their families, in the child protection system.

First Nations children comprise almost half of all children in state care, yet only a small proportion of child protection funding is directed to First Nations community-run services.

This structural imbalance undermines reform efforts and limits the system's ability to deliver culturally safe, effective and preventative responses. Addressing overrepresentation requires a deliberate rebalancing of investment towards ACCOs as the organisations best placed to support children and families within their communities.

YFS strongly supports the principle – reflected in Queensland and national policy frameworks – that Aboriginal and Torres Strait Islander peoples have the right to self-determination in matters affecting child and family welfare. ACCOs are not merely service delivery partners; they are expressions of First Nation self-determination, cultural authority and community accountability. A genuine partnership with ACCOs, including delegated authority and long-term investment, is essential to redesign a child safety

¹<https://nit.com.au/23-07-2025/19257/indigenous-kids-in-focus-for-broken-care-system-probe>



system that keeps children safe, connected to culture, and supported to thrive within family and community.²

As such we make the following recommendations.

Recommendation 1: Embed ACCOs as equal partners with delegated authority within the child safety system

1. The Commission should recommend that the Queensland Government mandate ACCO involvement in significant decision-making for First Nations children, expand ACCO led family led decision-making, and progressively increase delegated authority where ACCOs demonstrate readiness.
2. Success would be evidenced by ACCOs being resourced to lead, not merely attend, decision-making processes affecting First Nations children and families.

Recommendation 2: Provide sustainable, long-term core funding and dedicated capacity building investment for ACCOs

1. The Commission should recommend multi-year, indexed funding arrangements for ACCOs, accompanied by dedicated capacity-building funding to strengthen governance, workforce development, quality systems, and organisational infrastructure.
2. Funding models should explicitly recognise the additional system load placed on ACCOs through mandated partnership requirements with non-First Nations organisations.
3. This investment in funding must be additional to the current investment in service delivery, not through a diversion of existing funding.

The Role and Importance of ACCOs in the Child Safety System

Aboriginal and Torres Strait Islander Community-Controlled Organisations (ACCOs) are independent, not-for-profit entities operated by and for Aboriginal and Torres Strait Islander communities. They provide a range of activities and services – including family support, early intervention, mentoring, training and employment, child protection case management, foster/kinship care support, cultural advisory services, and healing programs – delivered in way that is grounded in *culture, community knowledge, and accountability to First Nation governance structures*.

In the child safety system, ACCOs embody the values of the Aboriginal and Torres Strait Islander Child Placement Principle (ATSICPP) – especially the elements of Prevention, Partnership, Placement, Participation, and Connection – by working to keep children safely at home, involving families in decisions, placing children with kin or First Nation carers, and maintaining strong and ongoing connection to culture.³

Why ACCOs are vital: Decades of evidence and community experience show that outcomes for First Nations children improve when First Nations people design and drive the solutions. ACCOs are uniquely positioned to provide culturally safe, holistic support that mainstream agencies often struggle to deliver.

²<https://nit.com.au/23-07-2025/19257/indigenous-kids-in-focus-for-broken-care-system-probe>

³<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>



Their role is not supplementary, but foundational to an effective and equitable child safety system. Key strengths of ACCOs in the child safety context include:

- **Cultural Expertise and Safety:** ACCOs ground their services in culture, language, and healing practice, creating environments where families feel safe, understood, and respected. This cultural authority and competence leads to greater trust and engagement from First Nations families. In practice, this means families are more willing to seek help early, participate in case planning, and work collaboratively toward solutions when supported by an ACCO they trust.
- **Community Connection and Trust:** ACCOs are governed by First Nations leaders and staffed largely by First Nations professionals and community members. They often have deep-rooted relationships within the communities they serve. This local legitimacy enables them to engage families who might distrust government agencies, leading to earlier intervention and more effective family support. Evidence from other jurisdictions shows that transferring decision-making and resources to First Nations organisations can dramatically improve family engagement. For example, trials in Victoria where child protection authority was delegated to ACCOs (under section 18 of the Victorian Act) resulted in improved family participation, increased kin placements, and better safety outcomes – due in large part to the focus on respectful relationships, cultural healing, and Aboriginal leadership in those services.⁴
- **Holistic, Family-Centred Approaches:** ACCOs typically deliver holistic child and family welfare programs that address underlying issues (such as housing, health, and parenting support) rather than focusing only on child removal or crisis management. These programs align with First Nation concepts of family and community responsibility for children’s wellbeing. Notably, Queensland’s network of Aboriginal and Torres Strait Islander Family Wellbeing Services (local ACCO-run family support services) has demonstrated success in keeping children safely at home or reunifying them with family.⁵ By providing culturally tailored parenting support, domestic violence assistance, and connection to Elders and kin, ACCOs help address risks before they escalate to child removal.
- **Accountability to Community:** As community-governed entities, ACCOs are directly accountable to the families and communities they serve. This accountability drives a level of responsiveness and innovation that is difficult for large statutory systems to replicate. For example, many ACCOs have created local programs (e.g. healing circles, on-Country camps, culturally informed foster care recruitment) precisely because they are attuned to local needs and guided by First Nations knowledge. This community-driven approach complements government-led services and ensures solutions are not one-size-fits-all.⁶

In summary, ACCOs play an indispensable role in the child safety system as essential partners who bring cultural integrity, community trust, and preventive approaches. Strengthening their role is not only a matter of respecting First Nations peoples’ rights – it is also sound policy for improving child safety outcomes. As SNAICC (the national peak for First Nations children) has consistently found, jurisdictions that empower and resource ACCOs see reductions in child removals and better long-term outcomes.⁷

⁴<https://academic.oup.com/bjsw/article/56/1/473/8324433>

⁵<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>

⁶<https://thesector.com.au/2022/11/30/family-matters-report-shows-when-accos-are-in-child-protection-outcomes-are-better>

⁷<https://thesector.com.au/2022/11/30/family-matters-report-shows-when-accos-are-in-child-protection-outcomes-are-better>



Systemic Barriers and Gaps Limiting ACCOs' Effectiveness

Despite broad agreement on the importance of ACCOs, our current system has not yet created an environment where ACCOs can thrive at scale. Through our work and consultations, YFS has identified several critical systemic barriers and gaps:

- **Governance and Infrastructure Gaps:** Operating a child and family welfare service to required standards involves significant organisational infrastructure – from governance systems (financial management, risk management, HR policies) to data collection, quality assurance, and service integration with the broader child protection system. Many smaller ACCOs, especially new ones, have not been supported to develop this infrastructure. For example, Queensland has seen the recent establishment of new First Nations-run family services (such as *Jinndi Mibunn*, an Aboriginal-led child safety service in Logan) as part of reform efforts. However, these new services are often set up without parallel investment in strengthening their organisational foundations.
- **Chronic Under-Funding and lack of capability building support:** There is a significant mismatch between the over-representation of First Nations children in the system and the funding provided to First Nations-controlled services. Nationally, Aboriginal and Torres Strait Islander children comprise roughly 40% of all young people in care, but ACCOs receive only about 6% of child protection funding.⁸ In Queensland, the previous government sought to lift the share of child protection investment in ACCOs from a very low base of ~7% toward a 10% target – still far short of parity with need. This financial marginalisation means many ACCOs must operate programs with limited scope, on short-term funding cycles, and with insufficient resources for infrastructure or growth.
- **Capacity and Workforce Challenges:** ACCOs frequently face workforce constraints that larger mainstream NGOs or government departments do not. Many operate in rural or high-need communities with a *limited pool of qualified staff*. The legacy of past exclusion means there are relatively few First Nations child protection practitioners in some professional categories (e.g. licensed child safety officers, social workers), and those who do exist are in high demand.⁹ Moreover, ACCO staff often carry the dual burden of Western-system expectations and community expectations, contributing to risk of burnout. We have observed high turnover and “workforce fragility” in some emerging ACCOs, where a small team of dedicated workers is expected to respond to very complex family needs with minimal back-up. Without targeted support for recruitment, training, and staff wellbeing, ACCOs’ capacity to consistently deliver quality services is constrained.
- **Systemic and Attitudinal Barriers:** Lastly, we must acknowledge that certain less tangible barriers persist. These include instances of paternalistic attitudes or lack of trust toward ACCOs within mainstream agencies, which can marginalise First Nations-led input. Although Queensland’s Child Protection Act and policies endorse partnership with First Nation agencies, in practice ACCOs report that they are sometimes brought into cases too late or their advice is not given equal weight. The Partnership and Participation elements of the ATSI CPP are not uniformly implemented – e.g., family-led decision-making processes are not always facilitated by ACCOs, and First Nations participation in child safety decision-making is often “overlooked” or treated as

⁸<https://nit.com.au/21-11-2024/14972/underfunding-of-indigenous-led-child-protection-services-continues-despite-growing-need-snaicc-report-reveals>

⁹<https://academic.oup.com/bjsw/article/56/1/473/8324433>



a mere formality.¹⁰ There have also been Departmental requirements and expectations of non-First Nation organisations to engage with ACCOs in the design and delivery of service models, with no corresponding financial support for the ACCO in the requirement to engage with non-First Nations organisations. Additionally, bureaucratic processes can be onerous – smaller ACCOs often lack the dedicated staff to meet complex reporting or compliance requirements imposed by funding bodies. Without adjustments or supports, this can divert already scarce resources away from frontline work. YFS has long advocated that new initiatives be mindful of “*client choice*” – meaning families should not be forced into or out of services based on rigid funding directives.

The above barriers collectively limit the impact ACCOs can have, despite their proven potential. In practical terms;

- ACCOs often struggle to recruit staff, retain expertise, invest in robust systems, and scale up services when funding is insecure or not commensurate with demand.
- Under-resourced and under-supported ACCOs may be unable to accept all referrals (leading to First Nations families being diverted to less culturally appropriate services or receiving no service).
- They may also struggle with compliance or service targets, which in turn can erode confidence among government partners.
- Worst of all, without strong ACCOs, the system misses its best chance to reduce the growing overrepresentation of First Nations children.
- Most critically, without strong, sustainable ACCOs, the system forfeits its best opportunity to reduce the ongoing overrepresentation of First Nations Children in care.

The Queensland Family and Child Commission’s Aboriginal and Torres Strait Islander Children’s Commissioner has noted that it is a “*significant omission*” when system reforms fail to directly address the root causes of overrepresentation and the need for community-led supports.¹¹ As long as these barriers persist, First Nations children remain more likely to be removed from family and less likely to receive a truly culturally safe, preventive response. Effective reform must strengthen – not destabilise – the ACCO sector and must avoid an unintended disruption of services that First Nations children families rely on.

Evidence of the Benefits of ACCO-led Approaches

There is compelling evidence – from research, inquiries, and on-the-ground outcomes – that strengthening ACCO involvement leads to better results for children and families. YFS urges the Commission to consider the following evidence and examples, which reinforce the case for expanding and supporting ACCOs in Queensland’s child safety system:

- **Improved Child and Family Outcomes:** The Family Matters Report 2022 found clear correlations between strong First Nations-led services and positive trends in child protection. States or countries that have empowered ACCOs, through measures such as delegated authority, ACCO-led family group conferencing, or community-designed support services

¹⁰<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>

¹¹<https://www.qfcc.qld.gov.au/sites/default/files/2025-08/Child-safety-commission-of-inquiry-complaints-Commissioner.pdf>



demonstrated lower rates of child removal and stronger family reunification.¹² Conversely, the failure to invest in “programs and projects that work” including ACCOs delivering family programs, - contributes to the widening gap in outcomes.¹³

- **Success of Early Intervention and Family Support Services:** A core strategy for preventing child abuse and neglect is providing timely, culturally appropriate family support. First Nations community-controlled agencies have pioneered models that excel in this area. Queensland’s own Family Wellbeing Services (FWS) – operated by ACCOs across the state – are a case in point. These services have been shown to keep children safe and support family reunification, yet they remain under-resourced and often receive referrals only after problems have become acute.¹⁴ These outcomes arise because ACCOs and First Nations facilitators are able to meaningfully include family networks and community cultural leaders in decisions – something a purely statutory process often struggles to achieve
- **Cultural Connection and Identity:** Numerous studies have documented that maintaining a child’s connection to culture and community is a protective factor that supports resilience, healing, and long-term wellbeing for First Nations children.¹⁵ ACCOs, by design, ensure that cultural identity is nurtured throughout a child’s involvement with the system. For children in care, ACCO-run foster and kinship care programs recruit First Nations carers, facilitate regular family contact, and incorporate cultural plans that go beyond tokenism. The Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP) emphasises that “cultural connection must be central, not secondary, to care and protection”.¹⁶ Where First Nations children are supported by ACCOs, they are more likely to be placed with kin or Aboriginal foster families, and to participate in language, Country and cultural activities. This, in turn, mitigates the identity trauma that often accompanies removal. The positive impact of such practices is evident in research – First Nations children in culturally matched placements experience greater placement stability and improved psychosocial outcomes than those placed in non-First Nations care, as shown in longitudinal studies in both Australia and the United States (e.g. outcomes from tribal-managed child welfare programs in the USA that incorporated tradition and community in care showed higher reunification rates and improved child wellbeing measures).¹⁷
- **Accountability and Advocacy:** ACCOs are often at the forefront of advocating for system improvements, precisely because they are close to the families affected. Lived experience and community-led advocacy demonstrate that supporting ACCOs is not a fringe proposition; it is a widely endorsed response to systemic failures. Similarly, past inquiries (such as the 2013 Carmody Commission of Inquiry) and national reports have recommended boosting the role of ACCOs. The ongoing Closing the Gap reform (Target 12) commits governments to reduce the overrepresentation of First Nations children in out-of-home care by 45% by 2031, and a key strategy to achieve this is to partner with and fund community-controlled services to design better responses.^[18] There is clear consensus across policy, practice and reform agendas that without

¹²<https://thesector.com.au/2022/11/30/family-matters-report-shows-when-accos-are-in-child-protection-outcomes-are-better>

¹³<https://nit.com.au/21-11-2024/14972/underfunding-of-indigenous-led-child-protection-services-continues-despite-growing-need-snaicc-report-reveals>

¹⁴<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>

¹⁵<https://thesector.com.au/2022/11/30/family-matters-report-shows-when-accos-are-in-child-protection-outcomes-are-better>

¹⁶<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>

¹⁷<https://academic.oup.com/bjsw/article/56/1/473/8324433>



strong ACCOs this target cannot be achieved – and that with them, there is a far greater likelihood of success.

- **Examples of Progress in Queensland and Beyond:** There are encouraging steps to build on. In Queensland, the Department has supported an Aboriginal and Torres Strait Islander family-led decision-making (FLDM) trial in recent years, which empowered families (with ACCO facilitators) to develop their own solutions for safety. Early feedback from these pilots indicates improved engagement of parents and extended kin, creative safety plans that prevented removals, and high satisfaction among participants. Other jurisdictions offer models to learn from: Victoria’s Aboriginal Children in Aboriginal Care program (permitting ACCOs to assume legal guardianship for children on orders) has shown promising results in its pilot phase, and Western Australia’s statutory child protection law now mandates consultation with an ACCO for all significant decisions about a First Nations child. Internationally, New Zealand’s child welfare reforms (2017–2020) introduced concepts of Māori partnership and leadership in child protection decision-making – responding to findings that Māori children (similarly overrepresented) fared better when Iwi-led organisations were involved.

Across these examples, a consistent lesson emerges: child protection systems are more effective when First Nation organisations are trusted, resourced and enabled to lead responses for their own communities.

In light of this evidence, YFS strongly supports scaling up both the role and capacity of ACCOs in the Queensland child safety system. We also stress that this must be done thoughtfully. It requires not only a shift in resources, but sustained reform in how government and mainstream services partner with ACCOs at every level of the system.

Recommendations

YFS proposes the following key reforms to ensure the child safety system better supports ACCOs in a respectful, sustainable, and capacity-building manner. These recommendations align with the themes of respectful engagement, shared decision making and sustainable funding. We urge the Commission to consider inclusion of these in its final report and recommendations to the Queensland Government.

1. A Genuine Partnership with ACCOs

Mandate ACCO involvement in key case decisions, co-design policy and practice settings with ACCOs, expand family-led decision-making and delegated authority, and establish joint advisory committees at both strategic and operational levels.

Putting “Participation” and “Partnership” principles into practice: This reform ensures First Nations voices lead and shape all aspects of child protection, ensuring more culturally informed decisions and greater family trust in the system.¹⁸ Shared decision-making with ACCOs will improve risk assessment and safety planning by incorporating cultural knowledge and community context. Over time, this collaborative approach will rebuild confidence in the system among Aboriginal and Torres Strait Islander families, encouraging them to seek support earlier.

¹⁸<https://www.qatsicpp.com.au/2025/07/23/child-safety-inquiry-the-knowledge-and-vision-we-will-bring-to-the-commission/>



It also gives practical effect to Queensland's commitments under Closing the Gap to transform government agencies through genuine partnership with First Nation peoples, rather than consultation after decisions are made.¹⁹

2. Sustainable, Long-Term Core Funding for ACCOs

To be able to achieve Recommendation 1 by enabling *genuine partnership*, the system must invest in increased and sustained core funding for ACCOs, including multi-year funding agreements and dedicated capacity-building resources to strengthen governance, workforce capability, and quality systems.

Addresses under-resourcing and instability: Dedicated capacity-building funds will allow ACCOs to recruit and retain staff, build capabilities to embed HSQF systems and capabilities, and invest in organisational infrastructure, allowing them to engage meaningfully and appropriately with the Departmental and non-First Nations systems. Multi-year funding and indexation guard against the disruption of short-term pilots and create the stability required for long-term impact. Sustainable funding recognises ACCOs as core pillars of the child safety system, rather than as peripheral or supplementary providers, and will result in more families receiving culturally safe and effective support.

It is neither reasonable nor equitable to require non-First Nations organisations to formally consult with ACCOs under government contracts without proportionate and ongoing investment in ACCO capacity. Genuine partnership requires resourcing that reflects the responsibilities placed on community-controlled organisations.

Conclusion

YFS seeks a stronger, fairer child safety system – one that genuinely respects and resources Aboriginal and Torres Strait Islander families and community-controlled organisations. Importantly, these reforms are interconnected and mutually reinforcing. With appropriate funding, ACCOs can build workforce capability and governance strength. With genuine partnership and delegated authority, ACCOs can lead culturally grounded responses that prevent harm and reduce unnecessary child removal. Together, these changes will strengthen the effectiveness, legitimacy, and sustainability of Queensland's child safety system as a whole.

Supporting ACCOs is not a zero-sum proposition. It is a sound, evidence-based investment that improves outcomes for First Nations children while enhancing system performance overall. By embedding ACCOs as leaders within the system, Queensland has an opportunity to move beyond piecemeal reform and toward a truly transformative, community-led child safety framework. This will help ensure that no Aboriginal or Torres Strait Islander child is disconnected from family, community, or culture, and that all children are afforded the safety, belonging, stability, and support they deserve.

YFS appreciates the opportunity to contribute to this Inquiry. We are committed to continuing our work alongside ACCOs, government agencies, and other partners to support the implementation of these reforms. The children and families at the heart of this system deserve nothing less than a comprehensive, culturally strong response – one that truly “keeps our kids safe” by empowering families, strengthening communities and enabling First Nations organisations to lead.

¹⁹<https://www.qfcc.qld.gov.au/sites/default/files/2025-08/Child-safety-commission-of-inquiry-complaints-Commissioner.pdf>