

Submission for the Commission of Inquiry into Queensland's Child Safety System with a focus on Complaints Systems

"They won't start helping you unless you're standing out for the wrong reasons. Once police or ambulances get involved, then they'll take you seriously."

Young person, CREATE Youth Advisory Group 2025

"Listen to the young person. It took me from 9 years old until I was fourteen years old to say that this is not a safe environment for me and my siblings (with my foster parents at the time). I would go to Child Safety myself and tell them to remove me from that placement. I said 'you guys will get sued if you don't move me.'"

Young person, CREATE Youth Advisory Group 2025

July 2025

CREATE Foundation

A Yuggerra and Turrbal Country

15 Lever Street,

Albion QLD 4010

T (07) 3317 6020

E advocacy@create.org.au



About CREATE Foundation

The CREATE Foundation is the national consumer peak body for children and young people with an out-of-home care experience. We represent the voices of over 45,000 children and young people currently in care, and those who have transitioned from care, up to the age of 25. Our vision is that all children and young people with a care experience reach their full potential. Our mission is to create a better life for children and young people in care.

To do this we:

- **CONNECT** children and young people to each other, CREATE and their community to
- **EMPOWER** children and young people to build self-confidence, self-esteem, and skills that enable them to have a voice and be heard to
- **CHANGE** the systems impacting children and young people, in consultation with them, through advocacy to improve policies, practices and services and increase community awareness.

We achieve our mission by facilitating a variety of programs for children and young people with a statutory care experience and advocating for system changes to improve their experiences and outcomes.



Introduction

CREATE Foundation welcomes the opportunity to provide feedback and recommendations regarding the adequacy of existing complaints systems, procedures and incident reporting guidelines for those wishing to raise safety concerns about children under the care of the state, including in relation to residential care facilities.

Robust complaints systems and procedures are crucial to support the safety, health and wellbeing of the 12,700 young people growing up in Queensland's out-of-home care system. CREATE believe that children and young people's voices must be at the center of all decisions and systems that impact their lives. This submission addresses questions around the adequacy of existing systems and procedures based on young people's perspectives shared with us through our core programs and consultations.

Insights and recommendations

The insights from children and young people in care and with care experience in Queensland and recommendations for consideration are provided across the following themes in this submission:

1. Addressing young people's fears and concerns before they escalate into serious complaints and incidents.
2. A youth friendly and culturally sensitive complaints process.
3. Addressing serious complaints and incidents in an ethical and culturally sensitive manner that draws on lived experience.
4. Complaints and incidents specific to residential care facilities.

Child-friendly complaints process guide and toolkit developed for Queensland

CREATE Foundation was commissioned by the Queensland Department of Families, Seniors, Disability Services and Child Safety to design a child-friendly and contemporary complaints process for the child protection and out-of-home care system in Queensland as part of broader quality and safety reforms and system redesign.

A supporting toolkit was developed to ensure that implementation of the improvements to the complaints system is supported by child-friendly materials. The toolkit is designed by young people to encourage complaints, promotes supportive and engaging communication about the new process and changes for children and young people, is safe, and leads to clear actions and outcomes.

This work was undertaken as part of the 2024-2025 service contract between the department and CREATE Foundation. It was formally submitted to the department during the financial year. CREATE is continuing to work with the department to finalise details to support implementation of the report and toolkit. During the 2025-2026 financial year the department is expected to adopt and implement the guide.

The Child-friendly Complaints Process Guide and Toolkit is provided to assist the Commission of Inquiry at [Attachment 1](#). Please note that the documents have not yet been finalised, with minor edits underway prior to publication and distribution throughout Queensland's out-of-home care settings.



Insights and recommendations

1. Addressing young people's fears and concerns before they escalate into serious complaints and incidents

Young people have shared with us that they feel unheard, powerless, let down and sometimes even unsafe or out of control when the adults in their life and broader system do not listen to their fears and concerns. When not attended to in the early stages, these can escalate into serious complaints and incidents which all too often, are not adequately addressed. More specifically, young people with lived experience and expertise in the out-of-home care system have shared:

"[Ideally] you would feel validated, you would know that you can count on the workers and that you can go to them with any problems that you are having, and they will help you." Young person, CREATE Consultation 2025.

"They did not take me seriously. It got to the point where I had to nearly take my own life before they took me seriously." Young person, CREATE Youth Advisory Group 2024.

A common theme that young people have shared with us is around the impacts of under resourcing and high staff turnover within Child Safety, which means that they often lack positive relationships with skilled, stable and engaged caseworkers. This leads to a lack of relational safety in being able to raise and address concerns in the early stages. Conversely, young people who felt that they had a strong and consistent relationship with their Child Safety Officer (CSO) felt safe and supported.

"I have had about nine CSOs since I have been in care." Young person, CREATE Youth Advisory Group 2025

"For prolonged periods of time I had no caseworkers. You'd get appointed a new caseworker and wouldn't be told. Then they would leave or never turn up and you would find out you got a new one, but you'd never met the old one." Young person, Youth Advisory Group 2024


"I had a good CSO. She was phenomenal and went above and beyond. She would always advocate for us kids. Unfortunately she had too much of a case load and had to drop out. It happens a lot. People get burned out." Young person, CREATE Youth Advisory Group 2024

Additionally, young people have described not understanding how the Community Visitor Program works or have reported that they do not receive regular visits. This undermines trusting relationships that may otherwise facilitate conversations about concerns before they escalate into serious complaints.

"I haven't seen her [Community Visitor] for a while. She used to come to the house and talk to me but I am not sure why." Young person, Youth Advisory Group 2025

"I thought that Community Visitors worked for Child Safety until I did the [CREATE] Speak Up program and now I am more likely to ask for things I need." Young person, CREATE Youth Advisory Group 2025

First Nations young people have shared that they believe that increased visits from Aboriginal and Torres Strait Islander Liaison officers or similar roles would also facilitate the disclosure of concerns in the early stages and bolster feelings of safety and the capacity to raise concerns about matters of importance.



“There needs to be more Aboriginal Liaison Officers coming into residential care homes. There needs to be better communication between Child Safety and their mob because right now the communication is not happening.” Young person, CREATE Youth Advisory Group 2025

Young people have highlighted that despite the above concerns, sometimes there are a range of trusted others who might be able to advocate for young people’s needs. This may include family members, carers, workers, friends, teachers or leaders of recreational programs.

“I have a really good teacher at school. She checks on me most days.” Young person, CREATE Youth Advisory Group 2025

CREATE recommends:

1.1 Boosting the Community Visitor program to ensure regular visits that provide young people with information about their rights in care and support to address concerns and complaints in the early stages.

1.2 Bolster the capacity for Aboriginal and Torres Strait Islander Cultural Practice Advisors and Child Safety Support Officers to engage with young people regularly in order to build trust, facilitate the sharing of concerns and to support complaints processes in the early stages.

1.3 Provide clear and accessible information about complaints processes and mechanisms to schools and community groups that young people come into contact with. In many instances young people share their concerns with trusted others outside of the child safety system in the first instance. These individuals may be able to support young people to reach resolutions or access complaints systems.

1.4 Consider a peer navigator model to enable young people with lived experience of out-of-home care to be trained and supported to provide education about complaints systems, support and advocacy to other young people still in care, to enhance feelings of being understood and to provide relational continuity when staff turnover is high.



2. A youth friendly and culturally sensitive complaints process

Based on many years of consultation with young people around best practice complaints systems, CREATE has long advocated for a robust complaints systems that is youth-centered, accessible, independent and transparent.

Young people have shared with us some of the barriers to making complaints, including not knowing how, not believing that anything would change, or perceiving it to be a difficult or daunting process. Young people have also shared with us their ideas for what would constitute a good complaints system.

“The complaints service needs to be followed through. I feel like a lot of complaints don’t get followed through by a lot of people.” Young person, CREATE Youth Advisory Group 2024

“Young people should be involved in all of it. Receive regular updates of where in the process it’s sitting.” Young person, CREATE consultation 2025

“Our complaints don’t get resolved. They don’t believe us kids in care.” Young person, CREATE Youth Advisory Group 2024

CREATE recommends:

2.1 A complaints process that provides information in simple and age-appropriate language and that is available through a range of youth friendly forms (e.g. simple written language, infographics and videos).

2.2 A process that allows complaints to be lodged through multiple formats (online, telephone and in person).

2.3 A process that is culturally safe and trauma informed.

2.4 Design and implement a digital mechanism for young people to track and see the ‘status’ of a complaint. This would ensure that even if complaints cannot be responded to or addressed quickly, that information is available, enabling young people to feel that ‘somebody is listening.’

2.5 Clear and transparent timelines should be communicated, with all complaints receiving a response.

2.6 Supporting young people to understand that different complaints may be triaged differently depending on severity and provide transparency about this. For example, when lodging a complaint electronically, young people could be invited to rank the severity using a scale with relevant symbols threshold questions, or examples. Severe concerns are where a risk of harm exists or an inability to access vital physical or mental health care.

2.7 Clear information should be provided about options if young people have additional concerns through the process, enabling them to raise further complaints if their level of risk escalates. This should include a complaints body that is independent of the government department or service provider organisation where the complaint originated.

2.8 Mechanisms to enable input from other individuals who might be able to support or advocate for the young person in the complaints process.



3. Addressing serious complaints and incidents in an ethical and culturally sensitive manner that draws on lived experience

CREATE has heard from young people that when matters escalate and become serious complaints or incidents, it is important to them to be able to raise complaints outside of the service provider organisation or government department where the complaint originated. This is due to young people's experiences of and worries about not being believed and adverse consequences of complaining (which could include impacts on their quality of care or decisions that impact their lives). Young people have even shared with us examples of being 'punished' for making complaints.

First Nations young people have shared with us that it is important to them to be able to speak to and receive support from other Aboriginal and Torres Strait Islander people when they raise sensitive matters such as complaints.

"I want to feel like they believe me." Young person, CREATE consultation 2025

"[When a complaint is made] youth workers get angry and turn it against you and lash out at you." Young person, CREATE Youth Advisory Group 2024

"I'm Aboriginal myself, and going through the complaints line, black people get picked on the most and you get judged for being black... It would be better if my culture was more okay and I could talk to similar people." Young person, CREATE Youth Advisory Group, 2024

CREATE recommends:

3.1 The establishment of an independent, external complaints body to manage complaints that cannot be addressed and must be escalated beyond the service provider organisation or government department where the complaint originated. This would support young people, as well as workers and other parties, to raise serious complaints (included those related to health and safety) without fear of retaliation.

3.2 A model that prioritises the inclusion and support of Aboriginal and Torres Strait Islander workers within an external complaints body to support cultural safety for First Nations young people and community members engaging in the complaints process.

3.3 Ensuring that a young person lived experience oversight group is developed to work with the independent complaints body to co-lead the monitoring of complaints received and the responses to and outcomes of the complaints process.

3.4 Collaboration with Aboriginal and Torres Strait Islander Community Controlled Organisations and peak bodies such as QATSICPP to ensure that First Nations ways of knowing and lived experience is incorporated into the design and ongoing governance of complaints systems.

3.5 The independent complaints body should regularly review recurring themes to address systemic issues that are identified.

4. Complaints and incidents specific to residential care facilities

Based on feedback from children and young people, CREATE believes that there is significant room for improvement in relation to complaints processes for children and young people growing up in residential care. Young people have shared that they want to be consulted with and included in the processes and decisions that impact them.

“I feel like a lot of complaints don’t get followed through by a lot of people. I was in resi care myself and every time I made a complaint, it wouldn’t go to Child Safety – it would just go to the General Manager of the resi house.” Young person, CREATE Youth Advisory Group 2024

“I felt like I wasn’t heard. Every time I made a complaint, they would believe the workers over me.” Young person, CREATE Youth Advisory Group 2024

In addition to the general recommendations already outlined in this submission, the following should be considered to improve the complaints systems and procedures that relate to residential care facilities.

CREATE recommends:

4.1 Introduce a regulatory model for all residential care providers in Queensland and mandate the requirement for robust feedback and complaints processes for all residential care providers.

4.2 In addition to internal complaints mechanisms, ensure that complaints can be escalated to an independent, external complaints body where necessary.

4.3 As a part of regulating residential care providers, mandatory clinical supervision for all residential care staff should be considered as a crucial mechanism in ensuring that workers receive appropriate support to respond sensitively when informal concerns or complaints are raised by young people on a daily basis. This may also help to prevent unnecessary escalation.

4.4 As a part of regulating residential care providers, ensure that internal processes exist which support young people to learn about complaints processes and to provide regular feedback on organisation-specific complaints processes to ensure that they are working well and are ‘young person friendly.’ There is nobody better able to provide this feedback on whether internal feedback and complaints processes are working for young people than young people themselves.

4.5 As a part of regulation, residential care providers should be required to report on complaints and incidents and the organisations response to these.



Conclusion

Thank you for the opportunity to provide feedback on complaints systems as a part of the Commission of Inquiry into Queensland's Child Safety System.

By considering the implementation of the recommendations raised, young people would be better supported to raise fears and concerns early to help prevent escalation into serious complaints and incidents. In instances where serious complaints or incidents occur, through an accessible, youth-friendly, transparent and independent complaints process, young people would be better supported to collaborate around resolutions and have their serious safety concerns addressed.

Should you have any questions or require additional information, please contact the CREATE Foundation. E: advocacy@create.org.au

Attachments

1. Child-friendly Complaints Process Guide and Toolkit

1.1 Young Person Complaints Process overview: provides an overview of the process design for Queensland government, out of home-care providers, families and young people.

1.2 Young Person-Friendly Complaints Process: describes the recommendations and processes for young people.

1.3 Your rights in care: describes child rights and expectations of living in care.

1.4 You have a right to complain: describes the right to complain and supports speaking up.

1.5 Who should I complaint to?: describes who young people can complain to.



creating a better life
for children and young
people in care

Child-Friendly Complaints Process Guide and Toolkit

CREATE Foundation

A: Yuggera and Turrbal lands

15 Lever Street, Albion

Queensland 4010

T: (07) 3317 6020

E: create@create.org.au

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- The young people with lived experience of the care system and complaints mechanisms who shared their time and expertise to inform the project, including CREATE Young Consultants.
- The CREATE members who formed of the lived experience governance group, SHIFT Ministerial Youth Advisory Network, for their integral role providing oversight and direction.
- The [Department of Families, Seniors, Disability Services and Child Safety](#) for working with CREATE to ensure depth of child participation and insights to support quality and safety improvements and child protection system reforms. Including the Office of the Chief Practitioner and the Complaints Unit, for working closely with CREATE to ensure accuracy of information and immediately confirming and considering service changes and improvements in response to the insights and experiences of young people through this process.

About CREATE

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We achieve our mission by delivering a variety of programs and supports for children and young people with a care experience, and by conducting advocacy and research to improve experiences and outcomes.

For more information, see:

- CREATE's [Strategic Plan 2024-27](#), which outlines our strategic directions and goals.
- CREATE's [Menu of Programs](#), which outlines the range of programs, events and activities that CREATE runs.
- CREATE's [Menu of Consultations](#), which outlines our engagement, consultation and research offerings.



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Context

Child safe standards and complaints processes

The CREATE Foundation has been commissioned by the Queensland government to design a child friendly and contemporary complaints process for the child protection and out-of-home care system in Queensland as part of broader quality and safety reforms and system redesign.

CREATE Foundation is the national consumer body representing the voices of children and young people with an out-of-home care experience throughout Australia. Our vision is that all children and young people with a care experience reach their full potential. CREATE, with our child members and leaders with lived experience provide expert advice, insights and specialist expertise to government, sector and community partners. CREATE draws on deep practice expertise to ensure that children are provided with the space, voice, audience and influence to exercise fully their right to have a say over the systems, policies and legislative settings that impact their daily lives. We work collaboratively so that our partners are better equipped to understand the perspectives of children, and what needs to change so that children in care have positive childhood experiences and a enjoy a bright future.

Following the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse (2017), the [National Principles for Child Safe Standards](#) were adopted by each State and Territory nation-wide in 2019. Best practice and evidence-based complaints processes that are child-friendly form a vital part of safeguarding mechanisms and protections. A child-friendly complaints process in residential care is a critical part of safeguarding children's rights and safety. When a child, young person or their families have a concern, they need to be able to understand how to do that easily, trust that they will be heard and taken seriously, and that the issues they raise are responded to quickly and that response is shared with the child or young person who raised it – so that they know what will happen and how things will change.

Queensland is taking steps to reform its system and is making progress towards introducing Child Safe Scheme in alignment with the National Principles, with its Child Safe Standards will come into effect later in 2025. Pro-active engagement of CREATE, as the national consumer body for children and young people with care experience is part of the Queensland government's action to improve the quality and safety of child protection and out-of-home care.

The Queensland government has identified the need to implement a new, accessible and child-focused complaints system. This guide provides insights from young people, recommendations and tools to support the re-design of complaints processes to put young people's voices at the centre.

The CREATE Foundation, its lived experience governance groups, and SHIFT Ministerial Youth Advisory Network has provided expert advice of children and young people in care to support the design and implementation considerations reflect insights and deep knowledge unique to those with lived experience. This guide will support the Queensland government's efforts to implement a complaints process that is child-friendly and enables children and young people in care settings to raise their concerns, experiences and insights in a timely, safe, responsive and effective processes.

This guide places the perspectives and experiences of children and young people in care at the forefront of assessing system performance, service quality and practice and safety outcomes. Implementation of this guide and toolkit will enable young people to be active participants who can drive meaningful change.



Development of the Guide

Project oversight

CREATE designed this project, the workshop approach, oversight and consultation mechanisms with young people with lived experience of residential care in Queensland.

The design of this project was reviewed and endorsed by the SHIFT Ministerial Youth Advisory Network, comprised of young people with lived experience of residential care in Queensland. The SHIFT group was consulted to ensure that engagement approach was appropriate for young people, the format was young-person accessible and would result in the gathering of information required to formulate the workings of a child-friendly complaints process. Members of SHIFT endorsed the project outline and workshop plans.

Methodology

CREATE Foundation brings deep participatory methods and a sophisticated children and young people engagement approach that enable depth of consideration, broad exploration and structured design to be undertaken by children and young people of all ages with lived experience.

CREATE is uniquely positioned in Australia, bringing 25 years of child voice and child participation expertise to child protection and care system settings. The quality and rigour of processes ensures that genuine insights and perspectives are shared by young people through these participatory methods in safe and supported engagements. CREATE draws on deep practice expertise to ensure that children are provided with the space, voice, audience and influence, to exercise fully their right to have a say over the systems, policies and legislative settings that impact their daily lives.

Workshops were designed, with young people, to enable the development of this guide and toolkit to reflect the insights and experiences of young people, in particular young people with lived experience of the care system through the lens of cultural safety and accessibility.

Workshop design

CREATE Foundation facilitated two workshops which enabled young people with lived experience of care to undertake a deep dive and review of the current system and step out considerations for redesign and improvement. The first workshop focused on using codesign principles with young people to shape a complaints process for those living in residential care and the second workshop tested the resulting design with the group. The newly designed process was then further reviewed, validated and refined for development into this Guide and Toolkit.

Workshop 1: Deep dive review and redesign

Workshop 1 focused on understanding current complaints processes available to young people in residential care, where they would go for information about how to lodge a complaint, and where they may go for support in lodging a complaint.

Young people drafted key steps and considerations when complaints were to be lodged and a process for how complaints could be best managed.



Workshop 2: Process redesign validation and refinement

Workshop 2 focused on process redesign validation and refinement. Information from the first workshop was consolidated and drafted into a complaints process which was then tested and workshopped with young people during Workshop 2.

Participants - young people bringing lived experience expertise

Young people aged 18-25 years with a residential care experience participated in this consultation over the course of two workshops, delivered in person and online. While participants in the workshops share and bring deep systems expertise due to their lived experience, the workshops facilitate process and system review and redesign, and did not ask young people to share any personal information or experiences.

There was strong representation from First Nations young people and young people with a disability across all workshops. Demographics of the workshops have been summarised below:

Workshop	Mode	Number of Young People	First Nations Young People	Young People with a Disability	Total participants
1. Review and redesign	Online	4	3	4	8
	In Person	4	2	2	
2. Validate and refine	Online	5	3	2	5

Ethical considerations and consent

CREATE has assessed this project design and delivery as “Low Risk”, noting the following:

- Participation in the project for all young people is voluntary, and young people provided their consent to participate and understood the voluntary nature of participation. At all times young people could cease participation.
- Participants were supported by CREATE as part of volunteering for this project. Young people were given the space and time, and facilitated support to provide their insights and advice; and assured that their voice and the work represented in the guide and toolkit will be provided to the Queensland government, and will influence improvements to complaints processes for children and young people in out-of-home care.
- The age of participants was limited to young people aged 18-25 years.
- The project was co-designed with young participants.
- The workshop design did not pose questions regarding lived experience of the system, or personal disclosure of identifying demographics, characteristics or traumatic experiences.
- All young people who participated were remunerated for their time engaging in workshops.



Summary

Findings and insights

This project found that there is opportunity to significantly improve the complaints process for children and young people who are in the care of the Queensland government's out-of-home-care system. Through the workshops and consideration of the current complaints process, young people identified the following findings and insights into where there needs to be substantial change and improvements made.

- There is limited information or support about complaints processes, making them inaccessible and unclear.
- The process of making a complaint can create stigma and shame, a fear of consequences or different treatment by workers to their care if they speak up.
- Young people are not encouraged to provide feedback on current complaints processes, the process and responses to complaints made are not open or transparent.
- When a complaint is made, young people do not experience their concerns being listened to or taken seriously, there is a lack of responsiveness to what is raised.
- Young people are not included in oversight or monitoring complaints processes, the changes made and improvements across the system.

All of these findings and insights indicate that the Queensland government needs to make significant changes to process, oversight and implementation of complaints, to align with and meet National Principles for Child Safe Standards.

Guidance to establish child-friendly complaints process

This project identified and developed critical guidance to respond to the findings and insights regarding the current operation of the Queensland complaints process for children and young people in out-of-home care.

The guide outlines considerations on what needs to change so that there is a culture of support and encouragement for children and young people to know their rights, feel safe and supported to exert these rights, and what they can do to complain and use their voice and experiences to highlight where the system or service is not meeting their needs.

The guide also steps out a new process, and what this could look like from lodgement, to triage and handling and management of outcomes – and how this process can ensure the voices of children and young people are encouraged, taken seriously and responded to.

It provides additional considerations to strengthen communication, engagement and oversight. Young people identified the following as supports for participation and process improvements to support the implementation of child-friendly complaints processes and encourage young person participation in complaints mechanisms.



Supporting young people to make complaints

- Know what constitutes a complaint.
- Increase accessibility of complaints processes.
- Enhance safety in complaints processes.

Young person-friendly complaints process

- Lodgement of complaint.
- Triaging of complaint risk.
- Complaint outcomes.

Transparency, navigation and oversight

- Ability to track the status of complaints.
- Peer navigator role, education and support.
- Young-person led oversight group of complaints.

Toolkit for change

A supporting toolkit was developed to ensure that implementation of the improvements to the complaints system is supported by child-friendly materials. The toolkit is designed by young people to encourage complaints, promotes supportive and engaging communication about the new process and changes for children and young people, is safe, and leads to clear actions and outcomes.

Toolkit

1. Young Person Complaints Process overview: provides an overview of the process design for Queensland government, out of home-care providers, families and young people.
2. Young Person-Friendly Complaints Process: describes the recommendations and processes for young people.
3. Your rights in care: describes child rights and expectations of living in care.
4. You have a right to complain: describes the right to complain and supports speaking up.
5. Who should I complain to?: describes who young people can complain to.

The toolkit is provided as part of this guide, and as separate files for use by the department and their funded delivery partners.



Child-Friendly Complaints Process Guide

Findings and insights

There is opportunity to significantly improve the complaints process for children and young people who are in the care of the Queensland government's out-of-home-care system.

Through the workshops and review of the current complaints process, young people identified the following findings and insights into where there needs to be substantial change and improvements made.

- There is limited information or support about complaints processes, making them inaccessible and unclear.
- The process of making a complaint can create stigma and shame, a fear of consequences or different treatment by workers to their care if they speak up.
- Complaints processes do not include young people or invite feedback, the process and responses are not open or transparent.
- Complaints are not taken seriously, there is a lack of responsiveness.
- Complaints oversight and monitoring does not include young people.

These findings and further insights are summarised below.

Accessibility and information regarding what constitutes a complaint

Young people are not aware of the formal complaints processes

Young people highlighted that most complaints were often not raised by themselves through formal processes, due to not having information available as to what things would constitute a complaint nor how to raise it:

“I didn't know all of this existed, I just went through my CSO to lodge complaints.”

Information about child rights in care, and complaints processes is not consistently shared

The issue of accessibility in complaint systems within residential care for young people is characterised by a deficiency in clear information and support. This confusion often leads them to seek advice from industry professionals or online resources, which may not always be accessible or reliable.

There is a significant gap in the dissemination of information regarding their rights leaving young people uninformed and lacking the knowledge about next steps to raise concerns if they were to have them. The department has clear policies and procedures about where concerns can be raised and considered, including where decisions need to be reconsidered by QCAT – however this is not widely known or understood by children in care.

Young people indicated there should also be a paper form for them to be able to access:

“There should be a paper form too.”

Young people also indicated that this would be helpful if it was provided to them upon entry into residential care via a letter so that they have access to information about complaints and the ability to use the form if they need to.



Feelings of stigmatisation

There is a fear of adverse consequences if a complaint is raised

Throughout the consultation period, young people frequently report feeling stigmatised by the complaints mechanisms and shame in accessing the complaints process. Young people fear that raising concerns might label them as problematic or ungrateful, which leads to the stigma occurring for these young people.

Complaints processes are not always anonymous or confidential, and don't feel safe

Additionally, the lack of anonymity and confidentiality in some reporting processes exacerbates these fears, discouraging them from voicing legitimate grievances.

“Young people’s voices should be heard by the complaint.”

Young people even went as far as to describe feeling “criminalised” for wanting to put in a complaint:

“Decriminalise putting in complaints. You get treated a lot differently and made to feel like shit for putting in a complaint. There needs to be a lot of de-stigmatisation.”

To address these issues, it is essential to establish complaint procedures that prioritise confidentiality, recognize the validity of young people’s experiences, and view complaints as constructive feedback for enhancing care services.

Young people’s involvement and feedback

Young people repeatedly called for a complaints process that prioritizes transparency, inclusivity, and respect for their input. They expressed frustration with the lack of meaningful involvement and communicated a clear desire to be active participants throughout. Suggestions included tailored mechanisms for different age groups to improve accessibility and relevant communication about complaint progression and outcomes. For example:

“I feel like for younger children, it’s too formal. Children won’t sit there and try to read. We should do an infographic. Pictures and limited writing.”

“It depends on the young people too and whether they understand the process. They might not know how to use a phone or laptop.”

“I don’t think kids in care would find it easy to use the complaints process if they have a disability or if they were really young in care. It could be good for older young people who have an understanding.”

Young people also stressed that their complaints should be handled with an assumption of honesty, and they should be actively involved in every aspect of the handling process, from updates to participation in meetings. Additionally, the overarching feedback reflects young people’s desire for a system based on trust and fairness, where their voices are genuinely heard and respected. They advocated for processes that assume honesty and aim to empower them rather than alienate their participation. One individual summed this up by requesting:

“I want to feel like they believe me and want me to be active there in all meetings.”

This feedback underscores the need for a complaints system that genuinely integrates young people’s perspectives, making it more responsive, inclusive, and capable of fostering trust.



Complaints being taken seriously

The feedback obtained through the consultation highlights a significant concern regarding the seriousness with which child safety complaints are addressed. Many young individuals feel their complaints are not given the weight they deserve, particularly in cases involving serious matters. Young people said:

“Child safety should take all complaints seriously – when there’s serious stuff going on. Kids get hurt when child safety avoid complaints.”

“Young people should be involved in all of it. Receive regular updates of where in the process it’s sitting and where in the plan it’s going to be actioned.”

“Child safety need to make sure they take it seriously, because their complaints that aren’t taken seriously. The lodging of the complaints isn’t the issue it’s the progress of the complaint and where it’s up to that is the issue.”

The department has policy and procedures in place, with differentiated responses for seriousness, particularly where safety concerns are raised or disclosed by a young person. However, young people, when they raise their concerns, often many related concerns at once, are not feeling heard or seeing any action.

When a child or young person has a concern and raises it with the adults in their residential care setting, regardless of how it is raised, it must be responded to. The department is responsible for the care and upbringing of children and young people in residential care, and must ensure that supports are in place that proactively navigate these systems and ensure the complex and specific requirements, complaints process, form or agency are met.

There is a collective call for more effective progress monitoring, as indicated by one non-binary participant who stated:

“If there is risk of direct harm to the young person as a result of the complaint being made, that young person should know.”

This suggests the need for transparency and communication throughout the complaint process.

Additionally, young people highlight the necessity for structural improvements to ensure fairness and accountability. Suggestions include implementing tools such as scales or charts to classify the seriousness of complaints. They also advocate for simpler and more accessible methods to lodge complaints anonymously:

“Make sure they believe the child and not dismiss the complaint.”

“They should have a scale or chart to indicate the seriousness of a complaint.”

“All feedback and complaints get a response.”

A clear message resonates across all responses—the importance of timely responses, consistent updates, and actionable outcomes to ensure complaints, from the most minor to the extremely serious, are handled responsibly and effectively.



Oversight and support in lodging complaints

Creating a supportive framework for handling complaints which embeds oversight is essential to empower young people and ensure their voices are genuinely valued. Many participants have highlighted the importance of transparency and collaboration in this process. Having trusted adults or professionals directly involved can encourage individuals to engage in meaningful conversations. One such suggestion involved the adoption of a peer navigator model may be helpful for young people to feel involved and assist in supporting complaints. Young people stated:

“Peer navigators from a neutral organisation like CREATE could help. They will need to have boundaries and professional training.”

“Make sure you are matched well with the person who helps you through the process so you trust them and feel they can help you. They could make a website with photos and interests of the peer workers.”

Young people also indicated that oversight of the complaint itself was also important for young people to feel their complaints were being listened to, taken seriously and responded to. Young people felt that oversight and regulation by current processes within the department is not sufficient to ensure responses are occurring and recommended the following:

“Key workers could take young people out for a lunch to talk about complaints.”

“Schools and youth workers, any main people in your support circle should be involved in the complaint process and asked for their opinion.”

“A complaint should trigger a stakeholder meeting. The young person should be given the option of being involved. CVs [Community Visitors] should always be there.”

In addition to the above suggestions, young people also suggested a young person oversight group to assist in management of complaints which could be associated with the residential agencies or an independent organisation.

Supporting young people to make complaints

Young people identified the first step in the young person friendly complaints process was supporting young people to make complaints. This was then broken down by the young people into three distinctive categories:

- Knowing what constitutes a complaint.
- Increasing accessibility of complaints and rights information.
- Safety in complaint processes.



Know what constitutes a complaint

Young people spoke about wanting to have support in knowing what would meet the threshold for complaints. Largely, feedback throughout the consultation indicated young people felt that there was not adequate knowledge amongst young people regarding what constitutes a complaint. Young people suggested the following which could address this stage in the process:

- Community visitors actively describing the complaints process to young people and supporting them to lodge complaints through the entire process.
- A peer-navigator model of staff which are independent to the department and residential agencies to support young people to know what their entitlements are in residential care.
- Support from the department in knowledge of what young people are entitled to and not entitled to in residential care environments.
- The creation of a decision tree to support young people in knowing what constitutes a complaint and where to direct their concerns. The proposed decision tree is provided as part of the Toolkit.

These practice recommendations could be utilised to inform practice for young people in residential care in assisting them in knowing what constitutes a complaint.

Increase accessibility of complaints and rights information

Young people evaluated the existing departmental resources that are available in relation to complaints and rights and felt that there was improvements that could be made to these resources. Specifically:

- That the use of the Queensland Government logo and other references to the department itself can make young people not want to engage in the content due to poor relationships and prior experiences with departmental staff.
- Initially in care, young people are provided many pieces of paper and an additional booklet may not be looked at. Young people recommended this information be on one page rather than via a booklet.
- Young people liked the video describing rights in care, however identified that they are unlikely to engage in long-form video content.

Young people suggested the following resources which would be helpful for them to access information about complaints and rights:

- Short-form video content is the best way to engage with young people currently. Additionally, having young people who have been in care describing the process would be beneficial to gain engagement from young people in care.
- A letter should be sent to all young people upon entry into residential care which included a letter/flyer explaining rights in care, a paper form of the complaints form and information about how to complain (with phone numbers and email).
- Information sheet about the Office of the Public Guardian's role and Child Advocate's role in supporting young people could be added to assist young people in understanding how these roles assist.



Safety in complaint processes

Young people felt that an underpinning factor in complaints processes is feeling safe that complaints would be heard without further stigmatising them. Specific recommendations to increase safety for young people in lodging complaints include:

- Instigating a cultural change within residential care agencies and the department that complaints are an important feedback mechanism and young people should be encouraged to make complaints.
- Support staff to hear complaints in a non-judgemental and respectful manner to support de-stigmatisation of complaints processes.

Young-person friendly complaints process

In a young person friendly complaints process, young people spoke to clear steps which need to be actioned during a complaints process:

- Lodgement of complaint
- Triaging of complaint risk
- Complaint outcomes

The process diagram of the proposed young-person friendly process is provided as part of the Toolkit.

Lodgement of complaint

Young people indicated that the current processes by which complaints are received by the Department is appropriate with some modifications to make it child-friendly and more accessible.

Changes to lodgement processes that were recommended by young people include:

- The availability of a paper form for young people to lodge complaints as well as existing methods such as email and phone. Young people reported that access to phones and devices is sometimes limited in residential care settings and sometimes lodging a complaint via phone, email or online form may be difficult if they do not have access to devices, internet or mobile connection. Furthermore, young people reported that often when they would lodge complaints through their Child Safety Officer (CSO), this often did not progress to the formal complaint process, and they would not receive an outcome of the complaint.
- Complaints mechanisms should have an option for young people to indicate how they want to receive feedback from the complaint management team – either by phone, email or letter.
- Young people should receive confirmation of the complaint being lodged with the complaints unit regardless of who lodged the complaint, whether they lodged the complaint or another person lodged a complaint on their behalf. This should occur promptly and young people recommend 72 hours or 3 business days would be ideal for this to occur.



Triaging of complaint risk

Young people felt that one of the key steps once a complaint was lodged was determining risk level of the complaint and establishing the required response time for action to resolve the complaint.

Young people recommended clear timelines that escalated complaints as a priority if the risk level of a complaint was considered requiring immediate attention. Young people spoke about factors such as: harm or suspected harm, delay or lack of provision of health services, situations that required an urgent response due to external time pressures (such as, impacted by court dates, deadlines by other agencies or expiration of other circumstances). Young people recommended that there should be two categories: one for urgent review and response, and one for other complaints.

The department has well established pathways for escalation of complaints, response and triage processes, recognising a 'no wrong door' approach, the reflections from young people provide an opportunity to embed consistency in responsiveness and taking each child's concern seriously.

Complaint outcomes

Young people had a variety of suggestions related to the decision-making process of complaints and how outcomes can be managed. Collectively, they recommended:

- A formal response be provided to the young person in writing regarding the outcome of the complaint. This response should include clear processes for accessing more information, appealing a decision which does not address concerns, and options for an Independent Person(s) to be involved for First Nations young people.
- A follow up meeting one-on-one with the young person to explain the outcome of the complaint, what it means, and what next steps are.
- An option for young people to consent for the complaint to be referred to the stakeholder group for discussion at regularly scheduled stakeholder meetings, which a young person is a part of if they chose to participate.



Support for participation and process improvements

Overarching considerations

In a young person friendly-complaints process, young people identified the following as key considerations which would support the process and encourage young person participation in complaints mechanisms:

- **Ability to track status:** Young people identified the importance of having a mechanism like an application or website where they could track status of their complaints. Young people indicated receiving regular updates (such as every week or fortnight) would also be sufficient to know that status, and that the complaint is being worked on and there is continuing consideration of the complaint.
- **Peer navigator role:** Young people recommended that a role of a peer-navigator could be to support in the education for young people about complaints and supporting the complaint process alongside the young person.
- **Young-person led oversight group of complaints:** Young people felt that having a young-person led oversight group for management of complaints, such as a complaints advisory board, would assist in keeping young-people's perspectives and rights at the forefront of complaint management. It was suggested that this could function to review every complaint, or at key times in the year to assist complaint management and monitoring systemic changes, improvements and outcomes arising from the responses to the complaints. Young people's feedback in this group would be aimed to ensure that young people's rights and voices are heard in the complaints process.

Child-Friendly Complaints Toolkit

Young people participated in workshops facilitated by CREATE Foundation to develop the following Toolkit to support the implementation in response to their findings and recommended actions.

6. Young Person Complaints Process overview: provides an overview of the process design for Queensland government, out of home-care providers, families and young people.
7. Young Person-Friendly Complaints Process: describes the recommendations and processes for young people.
8. Your rights in care: describes child rights and expectations of living in care.
9. You have a right to complain: describes the right to complain and supports speaking up.
10. Who should I complain to?: describes who young people can complain to.



The contact details and links via QR codes will be finalised in advance of printing and distribution to ensure the most current content, reflecting the changes in progress in the department’s complaints management and practice improvement approaches.

CREATE will work with the department, to ensure that these resources are provided in the digital formats required to enable printing in poster, booklet, handout formats to enable the broadest distribution and display by the department and the sector throughout Queensland.

Conclusion

Addressing the needs and perspectives of young people through a comprehensive young-person orientated complaints mechanism is essential to improving the child protection system in a way which is accessible, transparent and empowering.

Through the recommendations outlined in this report alongside the accompanying toolkit, young people can feel empowered and safe to make genuine complaints about their lives in out of home care, specifically residential care.

The measures outlined in this report are practical solutions to challenges experienced by young people accessing complaints mechanisms, and place young people at the centre of consideration of complaints and support their access to have a voice about challenges in their living environment.

CREATE strongly supports the department working through the implementation of these changes as part of broader system reform. CREATE can continue to provide support to facilitate safe and meaningful participation and engagement with children and young people with out-of-home care experience across the suite of quality and safety changes and implementation monitoring.

Young Person Friendly Complaints Process



Young person wants to lodge a complaint

This involves the young person knowing **what** they can lodge a complaint about and **feel safe** to lodge a complaint, **with all staff working to actively support** young people to make complaints.

Complaint is lodged with allocated formal complaints team

- Young people can lodge complaints via the established pathways; online, via phone, via email or via letter. Complaints should also be able to be lodged via a paper form.
- The complaints form should request how young people would like to receive a response (eg. phone, text, email).
- Support system can assist in lodging complaints on behalf of young person.
- Young people should receive confirmation that a complaint has been received - even if they are not the ones to have lodged it.
- Initial acknowledgement of receipt of complaint should be sent to young person within 72hours.

Triage and timely responses to occur in relation to the complaint

- Each complaint should be triaged for a timeliness of response related to whether it relates to seriousness of issues, health and time impacts, such as an external timeframe.
- Young people recommend another category of response being 'other' complaints and these could have a 3 day response.



If a child is unsafe, take action and support them through this

- If complaint that relates to physical intervention by a staff member in a residential care home, staff should immediately act so that this is reported and responded to quickly, through the Regional Intake Service.
- Young people recommend that response time for situations related to physical harm/physical intervention/risk of physical harm, lack of health support or another decision where an external timeframe is involved, a response time should only be 1 day maximum.

Decision is made about action in response to the complaint

- Independent party separate to child safety and residential care provider evaluate the complaint and determine how to resolve in line with child rights
- Young people should be involved in the planning to address concerns.

Formal response provided to each young person regarding the complaint

- A written response either via email or letter should be provided to young people in relation to their complaint.
- A follow up with the young people to help them understand the outcome of the complaint should be completed by a support person or child safety.
- Independent Person for First Nations Australians is essential.
- If a young person consents (age 12 and up) to their care team knowing, this complaint should be discussed in care team meeting also.

For some complaints and decisions, the process is through QCAT

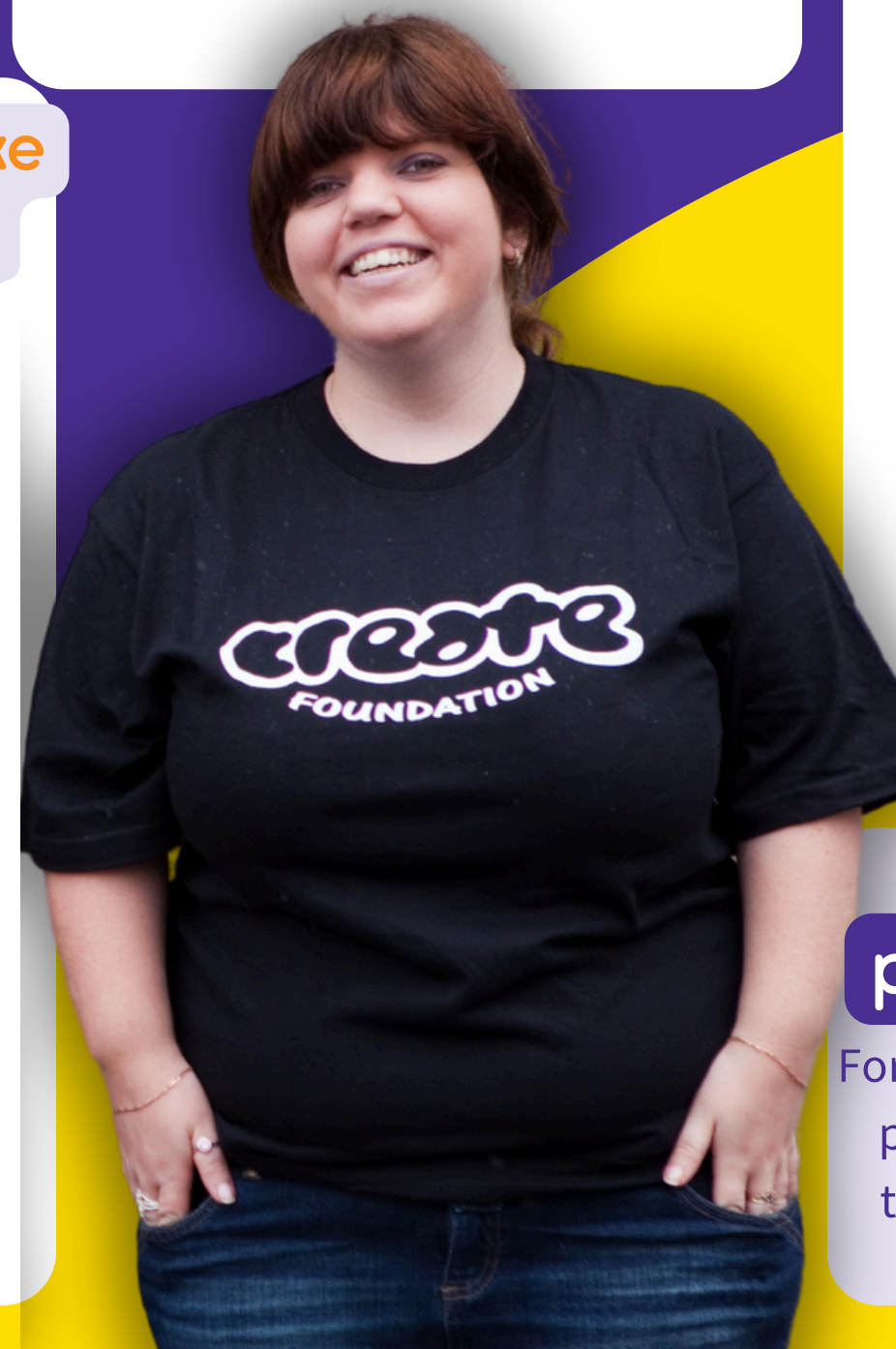
For some decisions, within 28 days of a placement or decision the review is through QCAT, the department can help young people navigate this.

Appeal processes to be made clear

- Young people should also have information available to them about an appeal process through the department if they are unsatisfied with the action taken.
- Appeals processes could include re-lodgement of the complaint or review of the actions/outcome.
- First Nations support agencies, including independent person should be highlighted in the appeal process.

Care team discusses the complaint

- All stakeholders should meet and discuss the complaint or have a regularly scheduled meeting where complaints can be discussed.
- Young people should be involved (if age and developmentally appropriate) or be able to nominate someone to be involved on their behalf.
- First Nations young people should have an Independent Person in this meeting.



Young Person Complaints Process

Supporting young people to make complaints

Know what constitutes a complaint



- **Community visitors** could be involved in education about rights and complaints
- **Peer navigators** to support learning, make sure they are matched well with the person
- **Community service organisation** to provide information and support complaints process
- **Some decisions can only be changed through QCAT** and need to be made in 28 days of the decision

Increase accessibility of complaint and rights information



- Videos of young people or staff sharing information about rights in bite-size (small form content)
- Information about child advocate (OPG) to be available early - make this compulsory.
- When young people enters care, they should receive a letter that has a paper version of complaint forms for their use.

Safety in complaint making



- Culture change to make complaint making safer - treated differently for lodging a complaint. Needs de-stigmatisation
- Destigmatisation occurs from transparency and not hiding the process.
- Encouraging/being open to feedback earlier.

Some decisions can only be changed by QCAT, make sure supports are in place to help young people with this within the timeframes for review

Overarching considerations

Ability to track status/outcome of complaints



- A useful consideration would be for young people to be able to track or **understand the status of their complaint**
- Suggestions included an application or website that could have a user portal to allow young people to see the status of their complaint
- Alternatively, ensuring that the **timeframes of 1-5 days to respond to concerns**, and 30 days for complaints procedures with accompanying escalation protocol are **promoted to young people and written in young-person-friendly language** could be used.

Peer-mentor role to support education and execution of a complaints process



- **A peer navigator/mentor** support model could have a role i education regarding rights and complaints processes
- This role should be appropriately matched to each young person (especially considering safety and trauma-triggers) and **young people should have a choice of who their mentor/peer navigator is.**

A young person-led oversight group to advise and monitor complaints



- There should be a young-person centred **advisory board** that sits within the complaints team to support complaints lodged by young people.
- This could be a review of every complaint or a review at times in the year of the responses to complaints quarterly or bi-monthly.
- Young people's feedback in this group would be aimed to ensure that young people's rights and voices are heard in the complaints process.

Your rights in care



Be safe and healthy

- Have a safe and stable place to live
- Have a care arrangement that meets their needs
- Receive care that meets their needs, including medical, dental and therapeutic care
- Be treated fairly and with respect
- Have privacy
- Have a safe place to keep personal belongings
- Play and take part in activities you enjoy, including sport, music and art



Be yourself

- Stay connected to your family, community and culture
- For Aboriginal children – grow up connected to country and community
- For Torres Strait Islander children – grow up connected to Islander culture and custom
- Follow your religion
- Learn your language
- Develop your own identity, including sexual orientation or gender identity



Learn and earn

- Go to school
- Be enrolled in job training and get help to find a job
- Be supported to transition from care to live as independent adults



Have a voice and be heard

- Have a say and take part in decisions about your lives, including where you live, seeing your families, your health and schooling
- Receive information to help you take part in making decisions and plans about your future
- Have your case plan and care arrangements regularly reviewed
- Have a say in who is given information about you
- Make a complaint to Child Safety if your rights are not being respected

The adults around you are there to ensure that your rights are met, and to listen when you are worried, and do what they can to respond and make things right.

If any of your rights are not being met you can lodge a complaint with the Department. Follow the QR code to lodge a complaint.



For some decisions you can seek a change directly through QCAT. Follow the QR code here to appeal.

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You have a right to complain

When you live in out of home care, you have a right to complain if there are things that are not happening for you or if things have happened that don't make you feel good.



If you have a complaint you can either talk to your CSO in your residential care home, or complain directly through the complaints team.

Their phone number is:

1800 080 464

If you're not sure where to go to share your complaint - use our decision tree!



If you would like help and support to make a complaint, the Office of the Public Guardian or your community visitor.

Their phone number is:

1300 653 187



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Who should I complain to?

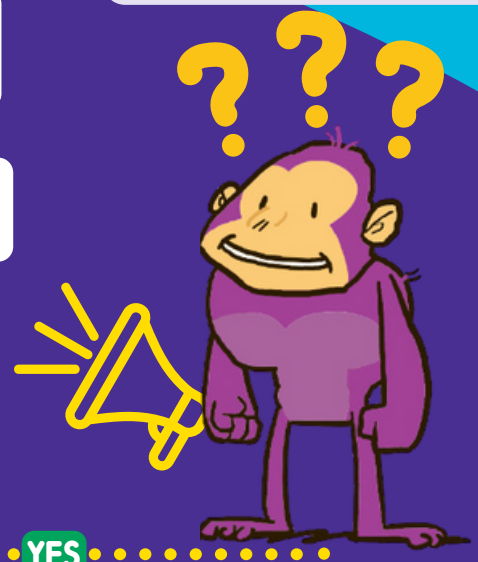
Young person decision tree

For any situation where you or others are unsafe call the Regional Intake Service

If you or others are unsafe it **more serious than a complaint or concern.**

This service is there to listen and make changes to make sure you are safe.

Phone numbers available from the QR Code for 9am - 5pm. Outside business hours, contact 1800 177 135.



Lodge a Formal Complaint

Follow the complaint process to formally report your complaint to the complaints team via the QR code, or:
Via phone: 1800 080 464
Email: feedback@dcssds.qld.gov.au



Child Safety Officers are there to help anytime.
Remember that any worries or needs you have, you can talk with the Child Safety Officer or other adults who are there to support you.

For some changes you go to QCAT

For some decisions, within 28 days of a placement or decision you can seek a review by QCAT using Form 17 via the QR code.



Your supporting adults can help to respond to your needs

Discuss with your Community Visitor, Child Advocate, Child Safety Officer, or other trusted adult about what your options may be to raise your concerns.