

Submission to the Child Safety Commission of Inquiry (Queensland)

Submission Title: Strengthening Child Safety Through Regulated Workforce Partnerships

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Submitted by:

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Executive Summary

Infinity Community Solutions (ICS), Dynamic Community Care (DCC), Arches Accommodation Supports (Arches), and Edmen Community Staffing Solutions (Edmen) welcome the opportunity to provide a submission to the *Child Safety Commission of Inquiry (the Commission)*.

Our submission responds to, and makes recommendations relating to, all the terms of reference of the Commission. In this context, our submission focuses on how well-regulated, evidence-based partnerships between frontline residential-care providers and credible flexible workforce providers can enhance the safety, stability and quality of care delivered to children and young people in Queensland.

The *2024 Children in Care Census* highlighted the scale and urgency of the challenges facing the child safety system. Rising numbers of children are in need of care at a time when workforce shortages across the sector are constraining capacity. Within this environment, flexible workforce provision has become an increasingly common mechanism for meeting this skilled workforce need. High-performing providers demonstrate strong governance, rigorous worker screening, comprehensive training and trauma-informed practice. Providers without these attributes demonstrate a potential increased risk to the industry. We recognise that the absence of clear, enforceable state-wide standards exposes children, practitioners and non-government organisations to avoidable risk.

Edmen and its partners work together through a partnership model that prioritises worker consistency, thorough orientation, robust governance structures and quality assurance, and continuity of care. This model allows Edmen's partners to focus on therapeutic services and case management, while Edmen itself provides a trained, screened, and a supervised workforce aligned to its partners' practice expectations. The outcomes include reduced turnover of staff, a credentialed and reliable workforce, and greater stability for children. These critical partnerships support the industry and illustrate the potential system-wide benefits when partnerships are well governed and regulated. These principles are not unique to our organisation as they can be applied across the sector to lift workforce availability, quality and safeguard children in residential settings.

Our submission proposes reforms aimed at strengthening regulatory oversight, embedding minimum workforce standards and identifying best-practice models that demonstrate how credible, flexible workforce providers can support, rather than substitute, frontline child safety delivery. We recognise the complexities inherent in this work and offer recommendations designed to improve outcomes for children while managing risks such as under-regulation, over-regulation, workforce shortages and market displacement.

About Edmen Community Staffing Solutions

Edmen Community Staffing Solutions (Edmen) is one of Australia's largest providers of community service workers and staffing solutions. Edmen has spent over 30 years connecting credentialed workers in the child protection, disability, aged care, and mental health sectors with government and non-government community service organisations.

Edmen delivers services under strict governance and quality principles combined with specialist expertise, national scale and a service-driven approach to deliver staffing partnerships that go beyond shift-filling. Edmen is backed by Healthcare Australia, one of Australia's leading and most established healthcare workforce and service providers.

About Infinity Community Solutions

Infinity Community Solutions (ICS) is an Australian not-for-profit organisation that delivers specialist early intervention, family support, NDIS support coordination, and out-of-home care across Queensland and South Australia. Since its establishment in 2017, ICS has worked closely with government agencies, Aboriginal and Torres Strait Island communities and accredited care providers to support children, young people and families experiencing vulnerability.

ICS partners with experienced workforce providers, including Edmen Community Staffing Solutions, to leverage the resources and expertise of large organisations to provide the highest possible level of care, with a focus on team orientation and continuity of care. Through this partnership, ICS is able to access trained, screened and supervised frontline workers who meet the complex behavioural and development needs of children in care. The collaboration allows scalable service delivery and improved workforce stability, enabling ICS to focus on delivering industry-leading, high-quality case management, counselling and placement support within a challenging sector.

About Dynamic Community Care

Dynamic Community Care (DCC) is a part of DCC Industry Group, an Indigenous-led organisation offering a range of services across labour hire, allied health, NDIS and youth, family and community care through its service divisions, Sound Solutions Therapy Services, Dynamic Community Care and Deadly Community Connections.

DCC specialise in trauma-informed practice frameworks and provide the Trauma Recovery Model in our programs. The organisation upholds the child protection placement principles in all our non-family-based care programs by incorporating culturally appropriate and therapeutic connections for children and young people and employing a highly skilled therapeutic workforce.

About Arches Accommodation Supports

Arches Accommodation Supports is a part of the Arches Foundation, a not-for-profit that offers support for youth workers across training, consultation and support services. Arches Accommodation Supports provides tailored accommodation support that addresses the unique needs of each individual. Combining evidence-based therapeutic frameworks with compassionate care.

Arches' services include safe and stable housing, creating secure spaces to promote healing and recovery, emotional and practical support and skill-building for independence. Arches' approach prioritises comprehensive trauma-informed care, specialised support for complex needs, immediate post-incident support and empowering its workforce.

Submission

Appropriate regulation of workforce provision in support of child safety providers

The context

Queensland's child protection system is operating under sustained and well-documented pressure. The *2024 Children in Care Census* highlighted the scale and complexity of demand, including the rising number of children requiring statutory intervention, increased placement needs and a growing cohort of children presenting with complex behaviours. At the same time, the broader health, disability, community and youth sectors continue to face structural workforce shortages, particularly in regional and remote areas, which affects the capacity of the government, non-government organisations (NGOs) and residential care providers to maintain stable and safe environments.

In response, the use of workforce providers to support the delivery workforce has increased. This model, *when implemented responsibly and with the appropriate governance and training structures in place*, enables continuity of services, appropriate staffing ratios, cultural awareness, surge capacity and the ability for NGOs to focus on their core mission of providing high-quality therapeutic care. Reputable flexible workforce providers invest heavily in governance frameworks, worker screening, mandatory training, incident management and compliance with the relevant child safety standards.

There are, however, significant inconsistencies across the sector. While some organisations demonstrate best-practice, there are instances where poorly governed, profit-driven operators prioritise short-term, transactional, commercial outcomes over child wellbeing and staff supervision. This inconsistency introduces avoidable risk into an environment which already includes some of Queensland's most vulnerable people. The current regulatory settings do not always provide sufficient guidance, transparency, external assurance or enforceable standards for workforce providers operations in out-of-home care.

Benefits of Structured Partnerships

Partnerships between specialist NGOs and credible flexible workforce providers can meaningfully strengthen the child safety system, especially when supported by appropriate regulation. Within this model, NGOs are able to prioritise therapeutic service delivery, case management, care planning and placement support. Credible workforce providers, drawing on their size, operational expertise and workforce agility to meet demand, can deliver screening, recruitment, rostering, professional development, industrial compliance and workforce planning at scale. Partnerships such as these can generate a high-trust, high-accountability system that also has the benefit of retention of the workforce, which has flow-on benefits of consistency in residential care environments.

When supported by shared governance frameworks, this model promotes clarity of responsibilities, operational efficiency, and effectiveness of care. This model also generates economies of scale that reduce administrative burden and duplication, which is particularly valuable for smaller community-based service providers. Importantly, this model delivers benefit where flexible workforce providers comply with, and are externally assessed against, robust and enforceable child-safe workforce standards.

Risks and considerations

As with any sector involving care of vulnerable populations, there are risks and complexities that must be addressed. Continuity of care; trust-based relationships; cultural requirements; and orientation, training and well-being of staff are some of the considerations that need to be addressed when utilising a labour-hire workforce to support frontline care.

Any reform to this sector should recognise the operational realities of delivering frontline care:

- **Continuity of care.** Children in care benefit from predictable, stable and trusting relationships. Workforce models that result in high turnover or insufficient supervision may undermine placement stability and therapeutic progress. Consistency should be a guiding principle.
- **Training, orientation and cultural awareness.** Workers supporting vulnerable children and youth, including Aboriginal and Torres Strait Islander children, require appropriate training in trauma-informed care, mandatory reporting, disability awareness, cultural norms and behavioural management. Minimum standards must be consistent across all providers. Workers should be trained to the same standard, whether they are staff from the NGO or a worker provided by a flexible workforce provider.
- **Defined accountability and oversight.** Where a flexible workforce provider supports NGO-delivered services, responsibility for safety, reporting and decision-making must be clearly defined.
- **Market dynamics and under-regulation.** Without clear standards that are effectively regulated, low-cost, low-compliance operators can undercut and displace ethical providers, which results in long-term system cost impacts and poorer outcomes for the children under care.
- **Avoid unintended consequences.** While the risks of under-regulation have been described, over-regulation may significantly exacerbate workforce supply issues if implemented ineffectively, especially applied with a heavy bureaucratic burden. Any regulatory shift should be phased, practical and supported by clear guidance following consultation with the sector.

Recommendations

This submission recommends that:

1. The Commission recognise workforce capability and resourcing as a central priority and make recommendations to ensure an adequately trained, culturally aware, stable and sustainable child-safety workforce across Queensland.
2. The Commission recommend the development of a fit-for-purpose regulatory framework to govern the use of flexible workforce providers within out-of-home care, residential care and youth support. This should include the required quality controls, workforce screening, minimum orientation requirements, a higher level of training that is standardised, incident reporting and data transparency.

3. The Commission examine existing high-performance workforce partnerships and identify best-practice models that demonstrate safe, ethical, trauma-informed and culturally appropriate flexible workforce support for frontline delivery. This should inform system-wide guidance.
4. The Commission recommend the strengthening of the Human Service Quality Framework and its standards as they apply to flexible workforce providers supplying workers to child safety delivery organisations. Accreditation should be independently assessed and audited and linked to ongoing eligibility to operate in the sector.

Conclusion

We believe that well governed and well-regulated use of credible, flexible workforce providers in the child-safety sector can produce incredible outcomes for the children, wider workforce and the state of Queensland.

Our model of shared responsibility between frontline therapeutic support organisations and flexible workforce providers, robust governance framework, prioritisation of credentialling and the embedding of a flexible workforce into frontline operations, provides an effective and proven example for a well-regulated and well governed out-of-home care framework.

Declaration

This submission is made on behalf of the listed organisations and reflects their shared views and experience in delivering child and community services.

Signatories

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