



# Submission to the Child Safety Commission of Inquiry

November 2025

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## Introduction

The Queensland Catholic Education Commission (QCEC) welcomes the opportunity to make a submission to the Child Safety Commission of Inquiry.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic school authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 313 Catholic schools that educate more than 160,000 students in Queensland.

Catholic schools are committed partners in safeguarding children and supporting families. However, in working with Child Safety to fulfill this commitment, a range of significant challenges and failures in responsiveness are all too evident. These failings place vulnerable children at heightened risk and result in schools assuming inappropriate responsibilities to maintain safety and stability.

This submission outlines the Catholic school sector's key concerns in relation to the Commission of Inquiry's Terms of Reference.

## **1) How the child safety system works for everyone involved, including Aboriginal and Torres Strait Islander children, their families and communities**

### **Lack of timely information provided to schools**

From the perspective of Catholic schools, a significant challenge in working collaboratively within Queensland's child protection system is the lack of timely and transparent communication from Child Safety following the submission of a child protection report. There is no formal mechanism for schools to be informed of outcomes following an investigation, such as the implementation of a child protection order or findings that, while no harm was substantiated, the student continues to disclose concerning information. This gap in communication compromises the school's capacity to respond effectively and maintain a safe and supportive environment for the child.

The following impacts are experienced by schools due to the lack of information on investigation outcomes:

- Inability to Plan Support - without knowing whether harm was substantiated or if a child protection order has been applied, schools cannot develop appropriate safety or wellbeing plans.
- Risk Management Gaps - schools remain unaware of ongoing concerns, leaving them unable to implement risk mitigation strategies for the child or other students.

- Missed Opportunities for Collaboration - lack of communication prevents schools from engaging with Child Safety or other agencies to coordinate care and educational adjustments.
- Emotional and Behavioural Challenges - when schools do not know the outcome, they cannot anticipate or respond to potential emotional distress or behavioural changes in the child.
- Compliance and Duty of Care Risks - schools may inadvertently breach duty of care obligations because they are not informed of critical protective decisions.

Ideally, Child Safety Intake Services should have in place an automated procedure for providing timely outcomes to all schools in Queensland following reporting. When the Unify implementation team was first established, there was some discussion about automating outcomes for education notifiers. It would appear that this was not a function that ultimately ended up being implemented.

### **Recommendation**

It is recommended that an automated notification procedure for notifying schools be implemented. This would automatically convey outcomes to school principals so that they are informed for what steps they need to take. This had been discussed when the Unify system was being put in place, but has not eventuated so far.

Principals would be appreciative of the rationale being provided along with the outcome decision. This helps shape their understanding of what is, and has been, happening for the student, because each rationale outlines the Department's thinking and often also their child protection history review. Given that schools are such important partners with Child Safety, and in the spirit of true collaboration, it would be ideal to see a strengthening and streamlining (perhaps automating) of this information-sharing process.

### **Communication in general**

While the child safety system is designed to operate collaboratively, Catholic schools frequently experience communication breakdowns, inconsistent engagement and lack of partnership from Child Safety Services.

A key issue reported by Catholic school authorities is difficulties in communicating with Child Safety Officers. It is noted that the workforce experiences significant turnover and as a result, there is little consistency of care for young people and changes in staff make it difficult for schools to be able to reach an officer when needed. In some cases, young people's Education Support Plans are delayed because Child Safety officers are unreachable to sign off on the documents, despite this being a required element. Some problems in communication that have arisen are:

- Persistent instances of email and phone communication with Child Safety Officers and Team Leaders being ignored or requiring multiple follow ups before responses are received or even acknowledged.
- Ongoing examples of Child Safety Officers and Senior Team Leaders failing to attend scheduled stakeholder meetings to support students' engagement at school and these meetings being driven solely by school staff who are coordinating external stakeholders, health professionals, parent and carer engagement. In instances where departmental staff do attend, they lack basic knowledge about the case and have no meaningful contributions to make, despite usually holding decision making responsibility.

## Information sharing

Improved transparency and timely communication are essential to ensure schools can respond effectively to child protection concerns and uphold their responsibilities in safeguarding student wellbeing. Currently schools experience:

- Delays or omissions in sharing of critical information (e.g. trauma histories, parental concerns, placement moves, contact arrangements and most crucially- safety plans where a child is at risk but remaining in the home or with one parent).
- Lack of willingness to collaborate and share information in line with legislation (Child Protection Act 1999 and domestic violence legislation) and in the best interests of children and families. This includes situations where there is a direct impact on decisions needing to be made in the school environment.
- Lack of consideration for the observations, experiences and professional judgement of school staff who are interacting with these young people and their families daily.
- Orders and Placement Agreements providing authority are seldom provided to or communicated with schools and when consent is sought from the Department there are significant delays often resulting in children being unable to engage in educational activities.

### Recommendation

Currently for information sharing purposes, child protection legislation limits the 'prescribed entity' to non-state school Principals only, without the option to delegate authority for the purpose of information sharing. This places a significant administrative burden on Principals being the sole 'prescribed entity' in respect of a non-state school. Legislation should be amended to take into account broader management structures in the operation of the non-state school sector, where information sharing could be coordinated by an appropriate officer/s at other levels of administration.

## Continuity and communication challenges with student case management

A significant operational gap identified by schools relates to the frequent turnover of student case managers within Child Safety. These changes often occur without notification to schools, making it difficult to identify the appropriate contact person for matters concerning the student's welfare and support. As a result, communications—such as phone calls and emails—may go unanswered or be misdirected, leading to delays in decision-making and support provision.

This lack of continuity and transparency in the allocated Child Safety Officers undermines collaborative efforts between schools and Child Safety and can negatively impact the consistency of care and planning for the student. Frequent changes in key staff contribute to the negative perceptions associated with children in care, intensifying their sense of being 'different' from their peers and making it more difficult for them to develop strong, trusting relationships with important supportive adults.

Without clear points of contact, schools experience unanswered calls and emails, hindering timely decision-making and coordinated student support.

## **Inappropriate Requests**

Informal and unverified information requests are sometimes made verbally over the telephone without the officer confirming their identity, raising concerns about privacy and procedural integrity.

Generic and broad requests can create operational strain. Vague or overly broad requests can delay appropriate information sharing or pressure schools to respond urgently, which can result in unnecessary disclosure of information.

Other examples of inappropriate requests include:

- Direct requests for school staff to question students for details when disclosures are made.
- A Regional Intake Service Team Leader providing potentially dangerous messaging to notifiers to stop a school from notifying repeated concerns via the intake service.
- Requests for school staff to safety plan/case plan/talk to families about serious child protection concerns.

## **Lack of understanding of legislation resulting in children being placed at risk**

Child Safety Officers and Senior Team Leaders sometimes lack familiarity with the *Child Protection Act 1999* guidelines, leading to incorrect references when requesting information from schools.

There have been multiple occasions of Departmental staff arriving at schools to interview children about concerns and it being clear that they have not read the reported concerns. There have also been instances of concerns and immediacy being inaccurately assessed placing children at immediate risk of harm.

## **Concerns regarding investigation closure practices and communication gaps**

Schools have observed a concerning practice within Child Safety where matters that have been screened in are referred to the Investigation and Assessment team, but if an investigation is not initiated within three months—and no new concerns are raised—the matter is closed without further action. This approach raises serious concerns regarding risk management and the fulfilment of duty of care obligations, particularly when initial concerns warranted screening in.

Compounding this issue is the lack of communication with schools when such matters are closed. After being informed that a concern has been screened in, schools are often not advised of the decision to close the matter without formal investigation. This absence of follow-up leaves schools without clarity on the status of the concern, potentially impacting their ability to provide appropriate support and safeguards for the student involved.

Improved transparency and timely communication are essential to ensure schools can respond effectively to child protection concerns and uphold their responsibilities in safeguarding student wellbeing.

## **First Nations children and their families**

Early intervention is critical for preventing children from entering care. Catholic schools offer targeted supports through First Nations partnership officers and Indigenous liaison officers which provide cultural support for students in engaging in school and external support services including 13YARN mob link and other First Nations services. Often however these officers, who are critical in community/family and school relationships and partnerships are left out of the child safety conversations and plans. Child Safety Officers often say they will not engage with these officers; however, they are critical in the positive relationship/support for First Nations children. In addition to this there are issues to do with the skill and

knowledge and high turnover of Child Safety staff which then breakdowns the relations with community/families and schools even more.

QCEC is aware that the current system of Child Protection Orders does not recognise cultural adoptions. While this is understandable to an extent, QCEC suggests that this represents a vulnerable group of young people who are ineligible for any support – through their schools or otherwise. This is not respectful of Aboriginal and Torres Strait Islander cultures.

## **2) How children, families and carers in the system are treated**

Catholic schools overall report inconsistent treatment of children, carers, and professionals by Child Safety Services.

### **Lack of responsiveness**

The threshold to investigate is significantly higher now, placing young people, families and staff at risk due to lack of intervention and mostly delayed intervention (up to six months). This then results in reluctance to refer and a professional sense of helplessness about situations for young people.

Feedback in relation to concerns submitted to the Department is significantly delayed or not received at all and the onus is placed on the school to safely plan for children's immediate safety. Schools are submitting multiple reports about children without having received feedback about earlier reported concerns.

### **Lack of support**

Catholic schools report:

- Inadequate advocacy for educational and therapeutic supports and significant delays in completion of referrals.
- Lack of proactive collaboration to support children's engagement at school when they are struggling. When reduced enrolment decisions are made the focus is on the impact to carers and department staff and not the child's needs and best interests.
- No advocacy for children in care by Child Safety Officers, this is often being done by external stakeholders and met with defence and no action by Child Safety as the decision makers.

### **Lack of connection**

As noted above, frequent turnover of Child Safety staff impacts on their familiarity with children and with their case history. Catholic schools' experience is that most children do not know their Child Safety Officer at all and that Child Safety Officers do not or are unable to make any proactive efforts to spend time with children. This results in children feeling like they are a 'job number' rather than a human being.

It is also reported that there is inadequate basic care being provided and a reluctance to address and improve on practice when concerns are raised. This often results in other agencies attempting to meet these needs, for example schools purchasing clothing for children, providing lunches and waiving school fees.

### **Carers**

Carers report to schools that there are significant delays in receiving their foster carer payments, uncertainty around their decision-making authority and lack of supports. Carers report not knowing who their child's Child Safety Officer is and home visits not occurring.

## **Professionalism**

Instances of Departmental staff arriving to collect students without identification, adequate car seats and on occasion without knowing the child's full name that they are there to collect.

Instances of children being collected very late with excuses provided such as staff being unable to book a vehicle.

## **Education Support Plan Fund**

The key mechanism to support young people in care in schools is through the Education Support Plan Fund (ESPF), which is designed to fund schools to work with young people in care who are enrolled to engage with various activities or supports to support them to achieve their academic, wellbeing and social goals. Currently the ESPF is only available to young people on a very narrow set of child protection orders – namely, those that assign the care of the young person to the Chief Executive. While this is understandable due to the wide range of Child Protection Orders, it does not address the fact that young people in long-term placements with guardianship to a different person may have suffered trauma and/or require ongoing support regardless of their current order.

## **3) Early Intervention Programs**

Schools report that early intervention opportunities are routinely missed, despite schools often identifying concerns first.

### **Key Issues:**

- Slow or absent responses to early warning signs raised by schools.
- Family and Child Connect works well if the family chooses to engage with them. If a family chooses not to engage or respond, then this places increased burden on schools/staff and places the young person at further risk.
- Limited access to early therapeutic and family support services.
- Schools asked to perform intervention or safety planning without authority.
- Lack of culturally specific early intervention for Aboriginal and Torres Strait Islander families.
- Lack of continuity of supports for children when they are placed with a new carer who is outside of the contact area for existing clinical interventions.

One issue with the work of Child Safety at present is that it remains independent and siloed from other actions that would support young people. In the education context, the 2025 report from the Queensland Family and Child Commission entitled *Include me, don't exclude me* provided evidence on the substantially increased rates of school exclusion for young people in care. It is well documented that exclusion from school can lead children to develop a range of mental disorders including depression and anxiety<sup>1</sup> and can impact their ability entering adulthood to achieve and retain ongoing employment. However, siloed approaches between different bureaucracies such as Departments of Education, Child Safety and non-government schools hinder the ability for Catholic schools to ensure young people struggling to maintain connection to schooling receive ongoing support.

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<sup>1</sup> T. Ford, C. Parker, J. Salim, R. Goodman, S. Logan, W. Henley. The relationship between exclusion from school and mental health: a secondary analysis of the British Child and Adolescent Mental Health Surveys 2004 and 2007. *Psychological Medicine*, 2017; 1 – Retrieved August 30, 2017 from *ScienceDaily*

As an example, the *Education (General Provisions) Act 2006* (EGPA) places a legal obligation on parents to ensure a child who is of compulsory school age is enrolled and attends a school, on every school day for the educational program in which the child is enrolled, unless the parent has a reasonable excuse. Leaders of Catholic school authorities do not hold the same statutory powers under the EGPA that are available to the Director-General of the Department of Education with respect to pursuing parents when issues of prolonged non-attendance arise. For the matter to be progressed, Catholic schools must refer each case to the Department of Education for follow up.

Previously, where cases of persistent student non-attendance arose and required intervention, the relevant Departmental office could be delegated to contact the family and prosecute where necessary regardless of school sector. However, the current policy position of the Department of Education is that this is no longer an accessible avenue until such as time as the student is unenrolled from the Catholic school. This position guarantees that a longer timeframe must pass before the issue is referred for further support, and risks that young people are lost entirely from formal education by the time the Department of Education acts. Noting the significant overlap of young people in care, absenteeism and the role of Child Safety and its delegated officers in ensuring young people attend school; QCEC recommends that bureaucratic barriers such as this be removed to ensure that help can be sought for vulnerable young people as soon as possible. Child Safety has a role to play in this in ensuring they partner closely between non-government schools, the Department of Education and Child Safety case managers to follow up on student non-attendance. Work is currently underway between the Department of Education and the QCEC to clarify pathways and processes to assist in mitigating this issue in the absence of a legislative solution.

#### **4) Models of Care – Including Residential Care, Foster Care, and Kinship Care**

Catholic schools observe that the model and quality of care directly affect children’s safety and learning outcomes. An overarching concern is that care arrangements for children in care are changing often and at times schools are not informed of changes in a timely way or at all. This makes it very difficult to support a student, manage family matters and ensure our systems accurately record student matters in respect of contact points/addresses/next of kin etc.

##### **Reforming the Residential Care System**

Schools, at times, work closely with children and young people in residential care, and witness firsthand the systemic challenges that impact their wellbeing, development, and access to equitable opportunities. The following observations are made.

- Children in residential care often experience a revolving door of youth workers, which undermines their ability to form stable, trusting relationships. This lack of continuity can exacerbate trauma and hinder emotional and social development. Without basic connections, these young people find it challenging to learn. From the school viewpoint, many youth workers appear to be underqualified and apparently poorly supported to manage the high-risk behaviours and complex trauma experienced by the children in their care. This places an unreasonable burden on them and contributes to burnout, high turnover, and inconsistent care. Further to this, the nature and structure of residential care impacts the already challenging task of creating a consistent and stable care team for a child.
- Inconsistent caregiving relationships mean schools lack a stable contact person to discuss protective and care needs, develop responsive education plans, and coordinate during crises when a child must be collected due to dysregulation or unsafe behaviours. The lack of stability and safety in residential

care environments significantly affects a child's ability to regulate emotions and engage in learning. Frequent placement breakdowns, requiring moves to alternative care arrangements, commonly result in schooling disruptions, further compounding educational disadvantage and emotional distress.

### **Recommendations**

Establishment of consistent liaison roles within residential care services to ensure schools have a reliable contact for planning and crisis response.

Implementation of transition protocols that prioritise educational continuity when placements change, including advance notice to schools and collaborative planning.

Development of integrated care and education plans in partnership with schools for children in residential care, incorporating strategies for emotional regulation and engagement to ensure consistency across context.

Introduction of post-placement review processes to monitor the impact of moves on schooling and wellbeing, with follow-up support for the child.

Additional issues to do with residential care include:

- Increasing placement of young children in residential facilities ill-suited to their developmental needs.
- Frequent placement moves with little to no notice or preparation for the child, resulting in children being collected from school by unfamiliar adults.
- Inconsistent provision of basic care whilst in these care environments (e.g., food, clothing, safety).
- Lack of emotional care provided which is necessary to the child's developmental age and development of a sense of security and safety.
- Exposure to information, conversations and experiences that are beyond the child's developmental age.
- High staff turnover and limited trauma training.

### **Foster and Kinship Care:**

School feedback includes:

- Kinship options not being explored by the Department in a timely manner and the focus being on the parents' views and wishes about kin rather than ensuring stability for the child and making decisions that are on the child's best interests.
- Placement instability - moving placements with no notice or advice to schools or the children, unfamiliar persons dropping off and picking up causing dysregulation to student, resulting in significant demands on school staff.

### **Children in Out of Home Care**

Data sharing – children in care

- A major challenge is the accuracy and sharing of data about children in out-of-home care. Errors in data supplied by Child Safety and incomplete information from schools (e.g., missing Education Support Plans) have led to children being overlooked or not receiving appropriate support.

Failure to recognise schools as key members of the care team

- Schools are often excluded from critical decision-making and planning processes, despite being central to a child's daily life and wellbeing. This oversight limits their ability to contribute meaningfully to safety planning and coordinated care.

Gaps identified:

- Lack of timely communication to schools about placement changes.
- No preparation or closure for children when placements break down.
- No transition planning for school continuity during placement changes.
- Insufficient emotional support for children with complex needs during crises.
- No follow-up or coordinated response after placement disruption.
- Schools left unsupported, managing high-risk behaviours without guidance.

### **Recommendations**

Early notification to schools of placement changes to enable planning.

Emotional and psychological support plans for children with complex needs during disruptions.

Collaborative planning meetings between Child Safety, carers, and schools before moves occur.

Post-move follow-up checks on wellbeing and school engagement.

Develop guidelines for managing high-risk behaviours in partnership with education and child protection agencies.

### **First Nations Children in Care**

- For First Nations children, the system must also address cultural safety. Embedding cultural safety, ensures environments (home placements, kinship care and residential care) are respectful and validating for Aboriginal and Torres Strait Islander children, young people and families, carers and community. However, systemic racism, over-surveillance, and historical trauma continue to impact families, leading to over-representation of First Nations children in care.
- Often young First Nations children are not placed in kinship care arrangements but rather are placed in residential care or with non-First Nations peoples. This continues to feed the negative perceptions of First Nations communities in relation to the role of 'Child Safety' and placements for vulnerable children/youth.
- Treatment of children and families varies, but First Nations children often face additional barriers. Trauma-informed practice is increasingly recognised as essential, given the prevalence of intergenerational trauma and the unique experiences of First Nations families. Catholic schools are encouraged to minimise exclusionary disciplinary practices and focus on reparative strategies, but there are ongoing reports of First Nations children feeling scared to complain about abuse due to the perceived outcome of being removed from home and their community.
- First Nations children are disproportionately placed in out-of-home care, often in non-Indigenous settings. Kinship care is preferred for maintaining cultural connections, but systemic issues such as mandatory reporting, social disadvantage, and lack of culturally appropriate placements persist.
- Catholic schools support the development of Education Support Plans (ESPs) for children in care, but challenges remain in ensuring culturally safe and supportive placements, particularly in residential care and care arrangements with many children on out-of-home care.

- The ESP process for students in care is effective if the staff in the school and the carers understand the process and there is accurate identification and culturally appropriate planning processes. Indigenous liaison, First Nations school support officers and similar positions should be involved in all ESPs with First Nations students particularly where the child has been placed in residential care and out-of-home care with non-Indigenous families.
- Coordination between agencies for First Nations children/youth in care is essential but often obstructed by data errors, differing priorities, high staff turnover from Child Safety and a lack of understanding of the cultural standpoint of these children, families and communities. There needs to be greater engagement with First Nations agencies, in particular Aboriginal health services, to support these vulnerable children/young people in care.

## 5) The Roles of the agencies in the Child Safety System

While Catholic schools play a crucial role in identifying risk and supporting vulnerable children, they are often excluded from formal processes and decision-making.

Non-state school Principals are very rarely invited to attend SCAN (Suspected Child Abuse and Neglect) meetings for students at their school. SCAN members rely on the Education Queensland Senior Guidance Officer SCAN representative to gather the details prior to the SCAN meeting however a non-state school Principal attending the meeting would result in a richer more robust discussion and therefore improve safety and outcomes for a child and their family. It would also allow the non-state school Principal to understand other key information for that family and that child to meet the day-to-day needs of the child at school.

### Key issues relating to SCAN

- Catholic Education is not recognised as a core member of the SCAN system which means that all at risk children within our system are at a distinct disadvantage.
- Catholic schools can refer matters into the SCAN Team meetings however there is a lack of transparency about and promotion of the referral process for non-state schools.
- When Catholic education does refer matters, staff are treated as an external stakeholder and advised that attendance is not required - despite being the referrer of the matter. This is not in the best interests of the children and families involved as the key agency who raised the concerns holds the most information. Subsequently, it does not seem to be an equal collaborative process which directly contradicts a number of the key principles of the SCAN team system.
- It has been reported in some regions that Catholic school staff are regularly asked to leave SCAN meetings after providing their specific update and are not made aware of broader concerns and discussions. This goes against the SCAN principles.
- Catholic school staff are regularly not being invited to the follow up review meetings with this being the decision of the core members and/or SCAN coordinator. There are significant inconsistencies between SCAN teams, and schools are unable to address these due to not being a core member.

### Child protection investigations

In practice, Catholic schools have observed several challenges when children or young people are interviewed under section 17 of the *Child Protection Act 1999* during departmental investigations:

- Confusion and Distress - children are often uncertain about the purpose of the interview, which can cause significant anxiety and distress. The process is rarely explained in a way that is age-appropriate or reassuring.

- Limited Choice and Support - in many cases, children are not offered the option to have a support person present or to choose a safe and comfortable environment for the interview. This lack of choice can leave them feeling unsafe and powerless.
- Lack of Post-Interview Guidance - after the interview, children typically do not know what will happen next. They are not prepared for potential repercussions at home when parents are informed, nor are they told how to raise concerns about the process or who to contact.
- No Safety Planning or Support Information - there is often no discussion about a safety plan for when the child returns home, and support services are not explained or offered. Children are rarely asked what would work best for them in managing their safety and wellbeing.
- No Outcome Communication or Follow-Up - children are not informed of the outcome of the investigation, and there is generally no follow-up check by Child Safety to ensure their wellbeing after parental contact has occurred.

When a child or young person is interviewed at a school under s.17 of the Child Protection Act 1999, their rights and wellbeing must be central to the process. The following enhancements recommended:

- Pre-Interview: Clear Explanation of Rights and Process
- Post-Interview: Next Steps and Ongoing Participation
- Follow-Up after Authorised Officers contact with parents and outcome

#### **Other interviews on school premises**

Children and young people are at times interviewed by Child Safety or Police on school grounds, not under s 17 of the *Child Protection Act 1999*. This also causes confusion for school staff, in regard to seeking and confirming permission of parents – particularly when the parent is not present, and in situations where one parent has provided consent, and the other may be unaware of the interview occurring.

It would be recommended that similar processes to above occur, in regard to informing children of their rights, and providing clear advice to schools about next steps is imperative to allow schools to continue to support the children in their care and navigate family dynamics.

#### **Excessive approval processes**

Basic activities that most children take for granted - such as attending a school camp, joining a sports team, or going on a sleepover - require multiple layers of approval. These processes are often delayed due to administrative backlogs and workforce shortages within Child Safety. These systemic delays mean that children in care regularly miss out on valuable learning, social, and developmental experiences. This not only contributes to feelings of exclusion and stigma but also limits their ability to thrive alongside their peers. This is particularly relevant for children and young people residing in residential care, without a consistent carer.

#### **Ambiguity in decision making authority**

There is ongoing confusion within schools regarding who holds the authority to approve decisions for children in care—whether it is the Child Safety Officer, carer or parent. This ambiguity leads to delays in decision-making and creates uncertainty for school staff who are trying to navigate complex care arrangements. Clear, consistent guidance is needed to ensure schools understand who is authorised to make decisions on behalf of the child, particularly in areas such as excursions, medical treatment, and educational planning and the justification for schools to be provided with a copy of the Child Protection Order, not just an authority to care.

## 6) How You Can Complain About Problems with the System

The current complaints framework lacks transparency, accountability, and a learning focus.

### Key Issues:

- The complaints process is defensive and blame-focused rather than solution-oriented — escalations are delayed or ignored, issues are not resolved, and concerns are met with non-committal responses rather than meaningful improvement.
- Lack of accountability and learning – complainants are often viewed negatively, feedback is not shared across service centres, and recurring issues persist without systemic or restorative change.
- Schools are key stakeholders in the lives of children known to Child Safety and are deeply invested in their wellbeing, safety, and educational continuity. When complaints or concerns are raised by schools regarding Child Safety decisions or practices, there is often little to no follow-up or communication provided. This lack of transparency and feedback undermines trust, limits the ability of schools to support children effectively, and signals a broader issue of schools not being recognised as critical partners in child protection.
- Formally acknowledging schools as essential stakeholders in the child protection system and establishing clear, timely, and respectful communication protocols for responding to complaints and providing updates on outcomes with other professionals is required. This would support a more collaborative and accountable approach to safeguarding children.
- While protocols for complaints, consultation, and disagreement with decisions do exist, they are often not enacted in practice. Furthermore, these processes are not publicly visible or easily accessible to school staff, particularly in non-state school settings.
- Non-state schools, which operate outside the government system, face additional barriers in navigating these processes. There is a need for formalised agreements - such as a Memorandum of Understanding - that acknowledge the unique context of non-state schools and ensure equitable access to complaint and escalation pathways.

## 7. Anything Else About Child Safety

### School refusal in the presence of other harm

In Queensland 'School refusal' as characterised by persistent absenteeism (including explained absences) has typically been exclusively considered a concern for educational authorities. It is proposed that school absenteeism should be considered an important indicator of possible neglect, similar to other jurisdictions - for example:

- In [South Australia](#), school refusal is highlighted as an indicator for neglect and substance use and/or mental health that impacts the safety and wellbeing of the child or young person
- In [ACT](#), "frequent absence or being late to school" is identified as an unmet basic need.

Examples in which school refusal may be an indicator of harm arising from abuse include:

- Emotional abuse: the desire to remain home to protect at parent subject to abuse
- Neglect: inadequate supervision leading to the use of illicit substances by a young person impacting their sleep and ability to function next day
- Neglect: failure to engage appropriate mental health/medical treatment in the presence of ongoing suicidal ideation.

**Recommendation**

Identification of school absenteeism (*on sites such as - [Types of child abuse | Community support | Queensland Government](#); in child protection practice guides*) as a possible indicator of harm. This would ensure that some of the most vulnerable young people are appropriately flagged with the child safety system.

**School refusal in the absence of other harm**

For completeness, there are many instances in which school refusal occurs despite the presence of a willing and able adult. For example: a parent who has actively engaged with professionals (assessments by child and adolescent psychiatrists/paediatricians, engagement with child psychologist and/or family therapists) around their child's chronic screen use.

Regardless of whether the school refusal represents a response to harm or occurs despite the presence of a willing and able parent, any child who is absent from school for significant periods is more exposed to emerging risks/vulnerabilities. These risks/vulnerabilities may take the form of increased isolation, increased family conflict, reduced self-esteem and ultimately, reduced developmentally appropriate pathways/options.

Attendance at school is rightly identified as a protective factor. School attendance is accompanied by regular interactions with adults. Importantly, these adults all receive regular mandatory training specific to child protection and are well placed to observe the behaviours and presentation of young people. When there are concerns, schools will consider liaising with families and other agencies in order to provide a pathway towards the best outcome for the child.

Conversely, in instances of chronic absenteeism, young people do not benefit from careful monitoring, referrals to appropriate supports or provision of the pastoral supports provided by the school. Again, whilst attendance at school is viewed as a protective factor in the context of a child protection assessment, non-attendance at school is not equivalently weighted in terms of the risks as outlined above.

**Recommendation**

Identification of school absenteeism (*within child protection screening protocols*) as a marked vulnerability/risk factor would ensure that some of the most vulnerable young people are appropriately flagged in the child safety system.

**2013 Queensland Child Protection Commission of Inquiry**

The recommendations set out by the Queensland Child Protection Commission of Inquiry (the 'Carmody Inquiry') included recommendation 4.6, which was not implemented.

*Recommendation 4.6*

*the Minister for Communities, Child Safety and Disability Services propose amendments to the Child Protection Act 1999 to:*

- *allow mandatory reporters to discharge their legal reporting obligations by referring a family to the community-based intake gateway, and afford them the same legal and confidentiality protections currently afforded to reporters*
- *provide that reporters only have protection from civil and criminal liability if in making their report they are acting not only honestly but also reasonably*

- *provide appropriate information sharing and confidentiality provisions to support community-based intake.*

As a consequence of not implementing this recommendation, reporting rates from mandatory reporters to Child Safety Intake services over the last decade have remained high, resulting in the continuation of demand on tertiary child protection services, as opposed to creating opportunities for early intervention and the involvement of secondary support services. The continued high levels of reporting to Child Safety Services impacts on resource allocation and provision.

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### **Recommendation**

The Queensland Government reconsider recommendation 4.6 of the Carmody Inquiry as a means to shape mandatory reporting behaviour, in order to best align child and family needs with the correct level of intervention required, as opposed to continuing excessive demands on Child Safety Intake Services as a tertiary entry point.

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### **Problematic Sexual Behaviour Among Children**

Catholic schools report ongoing incidents of intrusive sexual behaviour by children and young people towards peers (e.g., oral sex, penetration, coercive sexual activity, requests to undress). These behaviours often emerge early and, if unaddressed, risk escalation and entrenchment.

Gaps Identified:

- Parents may deny or minimise the behaviour, limiting effective intervention.
- Police will not act unless a crime has been committed.
- Child Safety Services have stated this is not a child protection concern, leaving schools without adequate support for early intervention.
- Consequently, opportunities to address harmful behaviours at the earliest stage are missed.

### **Recommendations**

Develop processes for tracking families who are repeatedly referred to Family and Child Connect but refuse to engage, to identify escalation and cumulative harm.

Mirror this approach within Child Safety Services, where multiple child concern reports could trigger a review process with intake services to determine whether further intervention is required.

Introduce specialist support pathways for managing harmful sexual behaviours in collaboration with education, health, and child protection agencies.

### **Conclusion**

The relationship between Child Safety and the Catholic education sector is characterised by systemic communication problems, inconsistency and a lack of accountability. Schools are carrying responsibilities that properly belong to Child Safety agencies. The system often fails to act in the best interests of the child, contrary to the principles of the *Child Protection Act 1999*.

It is recognised that for many years Child Safety services have operated under significant resourcing constraints while supporting some of the most complex and vulnerable children and families in the Queensland community. These systemic pressures have hindered the ability to deliver consistently

coordinated and responsive support, often resulting in children remaining in care for extended periods, the deepening of intergenerational challenges, and poorer long-term outcomes for all involved. It is important to acknowledge that these outcomes are not a reflection of the dedication or capability of Child Protection staff, who continue to work tirelessly under immense pressure, but rather a symptom of a system that is not adequately designed or resourced to meet the needs it serves.

To address these challenges meaningfully, there needs to be a move toward a more collaborative and partnership-centred approach to child and family safety – one that recognises, prioritises, and embeds cross-sector collaboration as a foundational practice. This includes shared responsibility, integrated service delivery, and practical mechanisms for working together across government, non-government, and community sectors to ensure the safety and wellbeing of children and their families is upheld in every context.

Catholic schools are deeply committed to the safety and wellbeing of every child. The issues outlined in this submission reflect systemic gaps rather than isolated incidents. Addressing them requires sustained reform, co-designed with education providers, Aboriginal and Torres Strait Islander communities, and families themselves.

A coordinated, respectful, and transparent partnership between Child Safety and Catholic Education is essential to restoring trust and ensuring every child — particularly those most vulnerable — can thrive in safety and with dignity.

Thank you for your consideration of this submission. Should you have any additional questions, please contact [REDACTED], Chief Operating Officer, QCEC on [REDACTED] or at [REDACTED]

Yours sincerely

**Allan Blagaich**  
Executive Director