



Mr Paul Anastassiou KC
Commissioner, Inquiry into Queensland's Child Safety System

1 August 2025

Response to call for submissions on the complaints system regarding children in care

Dear Commissioner,

This is a response to the call made on 1 July 2025 for submissions on 'the adequacy of existing complaints systems, procedures, and incident reporting guidelines for those wishing to raise serious safety concerns about children under the care of the state', including 'those in residential care, foster and kinship placements, and services delivered by funded service providers'.

This submission is made on behalf of the *Transforming Corrections to Transform Lives* (TCTL) Centre at Griffith University. It responds specifically to the call for submissions on complaints systems, and we will address other issues around the child safety system in subsequent submissions.

About TCTL

The TCTL Centre was established to support incarcerated mothers and their children to have safe, dignified and fulfilling lives. We work with government and community partners to break down intergenerational cycles of disadvantage and incarceration, by transforming systems and generating new knowledge for evidence-based programs. We are implementing a new program (the *Transform Lives Program*), co-created with mothers in Queensland prisons and stakeholders, that delivers wrap-around support for mothers while in prison and post-release, which also supports their children. We are improving outcomes including housing, health, employment, school engagement and family wellbeing, while also working to break down system silos that act as barriers to integrated support and service delivery.

Relevant to this inquiry, many of the families we are working with have children who are, have been, or are at risk of being, in contact with the child safety (CS) system. Our program staff have been working with women incarcerated in or recently released from all Queensland Corrective Services (QCS) centres. They have direct knowledge and experience of the challenges faced by incarcerated women in accessing CS complaints systems, and the adequacy of current procedures and guidelines. We summarise relevant issues below.

Practical barriers to complaints by women in prison

- Many women taken into custody are not informed of arrangements made for their children, including where they are or how to contact them. This immediately limits their ability to ensure their children are safe, or to make complaints where necessary. CS officers routinely fail to contact incarcerated mothers to discuss arrangements for children, causing stress and often exacerbating mothers' mental health concerns.
- There are significant barriers to women in prison contacting CS by telephone. Both QCS and CS have made recent changes intended to address this, with QCS changing its phone system to support CS contacts, and callers now able to contact a central CS Service Centre to identify the correct office and Child Safety Officer (CSO) to speak to about their child. However, prisoner calls are limited to 15 minutes. If, as is overwhelmingly the case, the relevant CSO is not available to take the mother's call, the CSO is unable to



contact the mother by a return call to the prison without first making arrangements with QCS to enable this. Given current caseloads, this tends not to be a priority for CSOs.

- In our experience, timeframes in CS legislation and practice guidelines frequently are not met when they relate to mothers in prison. This includes requirements for and time limits around family group meetings and provision of case plans. Mothers often don't know about these requirements or that they can complain about non-compliance.
- In our experience, most incarcerated mothers do not know there is a CS complaints process, what kinds of complaints can be made, or how they can be made. The CS number that women have access to in prison is to make enquiries about this child, it does not provide an option to make complaints. Being time limited, even if they were able to be transferred to a complaints line they would be unlikely to explain their concern, be transferred, and register their complaint within 15 minutes. Women in prison cannot access online systems and forms.
- Even if they knew where to send complaints, mothers are restricted to sending letters which come at a significant cost to them, and which rely on QCS to forward the letter in a timely way. Mothers in our program report that such letters are often lost between the two systems.
- In our direct experience working with close to 36 families over the past 18 months, no CSO has attended a prison to meet face to face with a mother in our program, or has facilitated access with a mother, without our direct advocacy. No CSO has accepted or advised on a complaint direct from a mother.

Practical barriers to complaints by women when released to the community

- Mothers face system overload on release, including the need to find housing, replace identity documents, access income support, meet any reporting requirements, meet health needs, and other factors. They often have limited capacity to add to this load by making CS complaints, and they lack confidence that any such complaints will be dealt with appropriately.

Barriers for complaints by support services, such as TCTL

- Despite holding appropriate written authorities to act on mothers' behalf, our experience is that CS team leaders or managers are reluctant to respond to our concerns or escalate issues raised in an appropriate or timely way. There appears to be no clear process for accepting complaints from service providers, and limited regard for the expertise of our program staff (all highly experienced and qualified practitioners). This leaves incarcerated mothers voiceless.

Barriers to making complaints because of a fear of consequences

- In our experience, many mothers do not want to make complaints even where we believe they are justified. Almost always mothers want to have or resume contact with their children as soon as possible. Mothers fear that complaints will stigmatise them within CS, and negatively affect their ability to have or resume contact with their children.



Conclusion

Most mothers who are incarcerated are not in prison for offences against their children and would have had ongoing contact had they remained in the community. Barriers to mother-child contact have clear adverse effects for children, especially infants who may not be able to build secure attachments with a mother in prison. Further, alienation from their children is a known risk factor for a mother having further criminal justice contacts. Current systems do not support ongoing mother-child contact, and the lack of a robust and accessible CS complaints system is a key part of this problem.

The issues raised above are based on our experience, but we have also experienced isolated examples of good practice, where particular CSOs work collaboratively and in trauma-informed ways with mothers, children and services. We hope this inquiry can encourage this good practice so that it occurs in a more consistent and transparent way. To that end we make the following suggestions.

Suggestions for change

1. Mothers in prison should be able to access the complaints system. There should be clear written information provided to women in prison about their right to make a complaint and how to do that. Further effort should be focused on overcoming the current barriers to women in prison making phone contact with CS. The CS complaints line should be added to the new Prisoner Telephone System in Queensland correctional centres as a matter of priority. When women do make a complaint, they should receive written confirmation of its receipt and details as to how it will be addressed.
2. Mothers in prison should be entitled to the same access to CSOs as if they were in the community. In particular, incarcerated mothers should be able to have face to face contact with CS regarding their children. To practically achieve this, CSOs should be encouraged to meet with women in prison and be allocated a case load that allows for this, including for any necessary travel (noting that in Townsville travel times are shorter but there are still limited CSO visits). There should be an expectation that CSOs attend prisons for meetings, addressing women's questions and engaging in case planning in a trauma-informed and person-centred way. This will require cultural and practical change.
3. A separate and independent unit should be established to receive and determine complaints. This would provide accountability, while also countering mothers' fear of reprisal.

Thank you for the opportunity to make this submission. We are happy to discuss these matters further if required.

Yours sincerely

Professor [REDACTED]
[REDACTED]

Director, Transforming Corrections to Transform Lives Centre
Griffith Criminology Institute