

25 August 2025

Commissioner Paul Anastassiou KC
Queensland Child Safety Commission of Inquiry
Via email

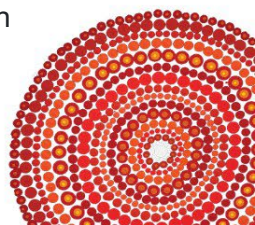
Submission on Matters Relating to Child Safety Services in Far North Queensland and Cape York Peninsula

1. Introduction

- 1.1. Act for Kids Limited (**Act for Kids**) welcomes the opportunity to submit information to the Queensland Child Safety Commission of Inquiry (the Commission) related to delivering Child Safety services in Far North Queensland and Cape York Peninsula.
- 1.2. Act for Kids is a national organisation that uses evidence-based practices to support children, young people and their families who have experienced or are at risk of abuse, neglect and violence. In 2024-25 we supported more than 37,000 people, including 21,788 children.
- 1.3. Act for Kids' feedback addresses the following issues identified by the Commission in the *Cairns Public Hearing List of Issues*:
 - **B. Carmody Implementation**
 - **C. Increase in the Numbers of Children in, and the Cost of, the Child Safety System**
 - **E. Residential Care**
 - **L. Models of Care**

2. About Act for Kids

- 2.1. Act for Kids is a for-purpose organisation that delivers evidence-led professional therapy and support services to children and families who have experienced or are at risk of harm. Our purpose is to help keep kids safe, heal from trauma, and lead happy lives. Established in 1988, our dedicated team of allied health practitioners, family support and residential care workers have helped hundreds of thousands of children and families for over 35 years.
- 2.2. Act for Kids team members are specialists in child development, trauma and wellbeing. Some have PhDs in child development, and nationally we employ more than 400 psychologists, occupational therapists, social workers, counsellors and speech pathologists.
- 2.3. The support Act for Kids provides ranges from protective behaviours education



to intensive therapeutic support, family interventions and residential care for children who have suffered neglect, and/or have experienced physical, sexual, emotional abuse and domestic and family violence. Over the past six years alone, these services have supported over 300,000 children and families.

2.4. Act for Kids provides a number of Queensland Government recurrently funded programs across the state. These include:

2.4.1. *Family and Child Connect* – Cairns, Mackay, Fraser Coast, Sunshine Coast, Gold Coast.

2.4.2. *Intensive Family Support* – Cairns, Townsville, Mackay, Rockhampton, Fraser Coast, Brisbane North, Gold Coast, Toowoomba, Roma.

2.4.3. *Pathways to Learning and Development* – Gold Coast, Toowoomba, Roma.

2.4.4. *Assessment and Service Connect* – Townsville, Mackay, Brisbane, Gold Coast, Toowoomba, Roma.

2.4.5. *Sexual Abuse Counselling/Youth Sexual Violence Counselling* – Cairns, Townsville, Rockhampton, Gladstone, Gold Coast.

2.4.6. *Counselling and Intervention* – Townsville, Brisbane.

2.4.7. *Residential care* – Sibling House, Cairns

2.4.8. *Residential care safe houses* – Napranum, Aurukun, Kowanyama, Pormpuraaw, Doomadgee.

2.4.9. *Bail Response* – Cairns.

2.5. Act for Kids also provides *Individual Support Services* – these are not recurrent funding. They are intensive short-term interventions requested via quote for children in residential care or foster care (not Act for Kids care). Interventions range from 3 to 12 months, outcomes are the deliverables required in the Request for Quote (RFQ) and include prevention of placement breakdown, improvement of placement stability, reunification, increased safety and child/young person wellbeing. Currently we provide these services in Cairns, Townsville, Rockhampton, Sunshine Coast, Brisbane and the Gold Coast.

2.6. In Far North Queensland specifically, Act for Kids has been delivering Child Safety funded services since 2006. These include the Referral for Active Intervention, Family and Child Connect, Intensive Family Support, Sexual Abuse Counselling, Bail Response and Youth Justice programs, Sibling House (formerly Family Reunification House), four Cape York Peninsula Safe Houses (Napranum, Aurukun, Kowanyama and Pormpuraaw) and Individual Support Services.

3. B. Carmody Implementation in Far North Queensland

3.1. Prior to the Carmody Inquiry, Act for Kids delivered the Referral for Active Intervention (RAI) program in Cairns and Yarrabah. The RAI program was a family support intervention funded by Child Safety Services to prevent families known to the Department from entering the statutory system. It was deemed

an early intervention and is the precursor to the Intensive Family Support (IFS) Services that were established through the Carmody reforms. The RAI program provided support to approximately 380 families (1000 - 1400 people) per annum from 2006 – 2015.

- 3.2. An early learning from establishing the RAI program in 2006 was that families referred were not needing *early intervention* supports. They had entrenched, chronic and serious issues such as housing and homelessness, unemployment, family violence, substance misuse and mental illness that were significantly impacting on children's and young people's safety, development, education and wellbeing. The intervention was designed to be a maximum of six months, which did not allow for engagement and addressing multiple complex issues.
- 3.3. Another early learning from the RAI program was that there were significant gaps in support services available for children, young people and families in the region and therefore, referrals to services were not possible or involved wait lists of many months. This included paediatric public services. At that time wait lists were six months or more.
- 3.4. The design of the Intensive Family Support (IFS) services took the learnings from the RAI programs into account and acknowledged that the families referred would have multiple and complex needs. The Carmody programs also included system solutions to the service gaps through the Family and Child Connect programs.
- 3.5. Since 2015, Act for Kids has been delivering the IFS service in Cairns and Yarrabah as the RAI service funding was absorbed into the IFS funding. Over that time, the service has supported thousands of families with approximately 700-900 individual children supported per annum. The issues remain the same as those identified in 2006: housing and homelessness, unemployment, family violence, substance issues, mental illness and now cost of living can be added. The wait times for public services has increased since 2006, with paediatric public appointments taking 12 months or more. While there are more services to refer families, children and young people to, they are often at capacity and/or have waiting lists.
- 3.6. The seriousness of the safety concerns for children has increased, especially from domestic and family violence. A review of Cairns IFS clients has revealed that at any one time 92-95% of referred families are directly experiencing domestic violence incidents, or in a period of recovery and support-seeking due to historical incidents of sexual assault and/or family violence. This results in a higher than typical risk level and the required intervention and safety planning against incidents of potential lethality exceeds the parameters of IFS program design.
- 3.7. The critical housing market in Cairns continues to impact families escaping domestic violence, along with many families living in houses that are in a poor state of repair or living in conditions that are unacceptable squalor. Housing

availability remains a factor that the IFS has almost no influence over but is a consistent contributing factor for referral.

3.8. Along with the difficulties inherent in the capacity of the service system in Far North Queensland, the other major issue is workforce. Over the past two years, the Cairns IFS has had a consistent vacancy rate of three frontline staff at any time. This vacancy rate has frequently required multiple recruitment cycles to identify and hire suitable candidates. Family Support Practitioners are often hired with less than preferred case management experience, requiring longer professional development periods commensurate with current case complexity and risk.

3.9. In addition, we are at a disadvantage competing for scarce workforce in Far North Queensland. For example, the current Award rates of payment and benefits are not competitive with similar roles in the Government. It is not uncommon for staff with experience of only 2-3 years to be remunerated \$20,000 more in government roles. Most of Act for Kids' team members are in younger age ranges, with fewer years of work experience. The average length of service is just over 3 years in Cairns.

3.10. In 2015, Act for Kids commenced delivering the Family and Child Connect (FaCC) service in Cairns and surrounds. Over that time, the service has received 16,000 family referrals. Over that period, Act for Kids five FaCC services have received 73,474 referrals.

3.11. From July 2023 to June 2025, 6,955 individuals were supported by the Cairns FaCC including 3,305 children and 1,680 people identifying as either Aboriginal and/or Torres Strait Islander. Referred individuals came from 53 different countries and spoke 33 different languages. In that two-year period:

- 35% of referrals were with the family's consent or were families self-referring into FaCC.
- 19% of referrals were made without the knowledge or consent of the family and were made by a prescribed entity i.e. schools, doctors, hospitals, police.
- 46% of referrals came from the Child Safety Regional Intake Service after they received a notification about the family that did not meet the statutory threshold for intervention. These families were also unaware a referral to FaCC had been made.
- After engaging with referred families and assessing needs, the Cairns FaCC made referrals for families into **200** different organisations for an extensive range of issues including but not limited to:
 - Adult mental health
 - Homelessness
 - Drug and alcohol services
 - War veterans services
 - Counselling services for both adults and children
 - Domestic violence services

- Womens' shelters
- Youth clubs
- Early childhood developmental programs
- Indigenous services
- Secondary family support services
- Intensive family support services
- Financial counselling services
- Emergency relief services
- Foodbanks
- Sexual abuse services
- Aged care services
- Emergency housing services
- Legal services
- Employment services
- Training services

3.12. Act for Kids believes FaCC services statewide have provided a gateway for vulnerable families to receive help, advice and assistance with navigating the service system. Whilst we cannot determine exactly how many of the families helped have been diverted from the statutory system, it is clear that without FaCC services many more would definitely have required statutory intervention.

3.13. The Carmody Inquiry overarching goal was to reduce the number of children in the child protection system, improve outcomes for those in care, and shift towards a family-centered, supportive approach.

3.14. In terms of the first recommendations around emphasising parental responsibility, the FaCC and IFS services definitely do this, however there is no way to measure whether the families accessing these services have actually been diverted from the system. No processes were set up to measure/map this at the implementation phase. Instead, Government has relied on absolute numbers without accounting for population growth and everchanging social determinants of family stressors including the rising cost of living, increased homelessness and housing stress and significantly increased levels of domestic and family violence.

4. C. Increase in the Numbers of Children in, and the Cost of, the Child Safety System and E. Residential Care and L. Models of Care

4.1. Act for Kids delivers six residential care services, five of which are located in the Far North Queensland region. Four houses in Far North Queensland are Aboriginal and Torres Strait Islander safe houses (Napranum, Aurukun, Pormpuraaw and Kowanyama). Child Protection Safe Houses were introduced by the Queensland Government in 2008. Safe house services were established as short-term placements for children in remote Aboriginal and/or Torres Strait Island communities to ensure "children who require out-

of-home care are provided the opportunity to remain connected with their family, culture, language and country” (p.29 of original Safe House Service Agreement 2009).

- 4.2. Since 2012, the intent of the safe houses has changed, with the expectation that the services will deliver general residential care for children from each community, or other children who have some community kin connections. The major change that resulted is the length of placements. Children are often placed from birth, or as babies and can live in the safe house for years. At every opportunity Act for Kids team members advocate for children to be placed with kin or reunified with family. Our local team members actively identify opportunities and advocate with Child Safety Services. Many of our local team members have taken on kin or foster care of children placed in the safe houses over the years.
- 4.3. In the first three years of the safe houses, approximately 110 children were placed on average per annum, for shorter periods of care (months at a time), during assessments or court processes. Prior to the safe houses, children who were the subject of statutory interventions were removed from community and placed in Cairns, Townsville or other centres. Often they were never returned to their communities and lost contact with family, community, country and culture. The average number of children placed per annum in the last few years is approximately 70. The average length of placement is in the years now, not months.
- 4.4. Over the last 15 years, the recurrent funding for the safe houses has reduced in real terms. The initial three-year period included extra funding for the setup of houses, recruitment and training of local staff and the development of local reference groups. The extra funding was removed in the second three-year funding contracts despite the high turnover in the casualised local workforce and the constant need for training of new staff. In addition, the funding for four safe houses was pooled and divided into five to fund a new house in Cairns at the request of the Department of Child Safety Services in 2015.
- 4.5. The initial funding of the safe houses also included a Tertiary Family Support component provided to support reunification work for the families of the children placed in the safe houses. This funding was removed in 2020. Prior to this, we had successfully reunified more than a hundred children.
- 4.6. Whilst the recurrent funding has been indexed over the fifteen-year period, the annual indexation percentage never fully accounts for the cost of living and is effectively retrospective. It is calculated on the previous year’s Queensland inflation data. In the period from 2012 to 2015, the Queensland Government did not index recurrent funding. Instead an efficiency dividend was levied of just less than 4%. So over time, the funding has not kept pace with inflation and in real terms has decreased.
- 4.7. In 2022-23, a group of not-for-profit residential service providers met with the then Director-General of the Department to discuss the funding models for residential care, which were not covering the cost of delivering the services. Act

for Kids was part of the group of organisations. The Department contracted Community Industry Services Association to undertake a piece of research looking at the cost of delivering residential care services in Queensland. The report identified that the majority of this group of organisations were experiencing annual deficits in funding that they were covering from their own fundraising. In fact, Act for Kids experienced a \$515,000 deficit in the safe house services in FY21-22. BDO undertook the analysis and provided a report to the Department of Child Safety Services.

- 4.8. At that time, the Act for Kids Board undertook a risk analysis of the costs of delivering the services and the funding shortfall. Our then Chairman, The Honorable Dr David Hamill AM, met with the Minister and Director-General to outline all our efforts to contain costs and the impact of the funding shortfall in real terms. Many other organisations had similar meetings with the Minister. For some organisations, the ongoing deficit over a large number of houses resulted in Boards deciding the risk was too great and as a result, divested themselves of these services.
- 4.9. The main issue with our budgets was and continues to be the increased costs of labour. The Social, Community, Home Care and Disability Services (SCHADS) Award rates have increased significantly since becoming a national modern Award. Prior to the Equal Remuneration Order, the SCHADS rates were very poor for the type of work experience and qualifications required for many roles in community services. As the Award rates have increased, the Queensland Government has contributed to some of the increased costs, however, required most of the costs to be absorbed into recurrent funded contracts over time. The BDO analysis of costs of residential care indicated that salaries and associated costs made up approximately 75-77% of total costs.
- 4.10. Act for Kids worked with the Department transparently about our costs and all the staffing cuts we had made to contain costs. Once decrements in quality of services became apparent due to cuts in staffing, we again spoke to the Department about increasing the safe house funding by a small amount annually to cover the costs of a Practice Quality Consultant to work with team members on the ground.
- 4.11. A recent review of the costs of buying food in the safe house communities of Napranum, Aurukun, Pormpuraaw and Kowanyama, compared with the same basket of basic items purchased at the Mareeba Coles, indicated that the cost was between 76% (Aurukun) and 93% (Pormpuraaw) more expensive. An example is white bread averaged at \$6.40 a loaf in communities and the same brand is \$2.40 in Coles Mareeba. Milk is at least \$2.50 more expensive for two litres of no name brand milk. Fresh fruit and vegetables are prohibitively expensive and often not available. In the wet season, both the bread and milk are often frozen, or defrosted for sale.
- 4.12. The average cost of fuel in communities is approximately \$2.90 per litre. Electricity costs are significantly higher due to reliance on local generators

and/or very remote power supply grids. For example, the annual cost of the power bill in Kowanyama is up to \$5,000. All residents in the communities, including our safe houses, must purchase power cards to operate an onsite power supply, as there are no power lines running directly to houses. Power cards can only be purchased Monday to Friday from the Post Office or local council chambers.

- 4.13. Transport of goods is by truck and barge during the dry season (June to November) with transport during the wet season (November to May) only by aeroplane. These are small planes, not commercial planes and for a one metre by one metre cubed cardboard box, the air freight charge can be more than \$1,000. To prevent having to pay such high freight costs and the resulting higher cost of food in the community stores during the wet season, Act for Kids purchases bulk meat and dry goods once a year which is transported to the communities via truck prior to the wet season. During the wet season, the cost of freight is increased by 1,000 to 2,000%.
- 4.14. Each safe house requires ten Residential Support Workers and a Team Leader to comfortably sustain safe operations. Factoring in leave contingencies, sorry business and community events, ten team members would not incur any overtime and an even balance of hours could be distributed amongst each of those staff. More than 85% of the safe house workforce identify as Aboriginal and or Torres Strait Islander. The majority of these workers are local to their communities.
- 4.15. Our local teams have dual roles in small communities. Many staff members are not just employees — they are also mothers, aunts, uncles, grandmothers, or respected community members in communities with fewer than 1200 citizens. This dual role means they carry the emotional and cultural responsibility of caring for children who may be related to them or connected through kinship systems.
- 4.16. The safe house team members also carry cultural obligations and cultural load that residential support workers in other services do not. Obligations such as sorry business, cultural ceremonies, funerals, and community events take precedence over work, and these can occur unexpectedly and multiple times a year. Staff can experience direct pressure from community members to influence placement decisions, visitation arrangements, or house operations in ways that align with family or clan preferences. In some cases, there is tension if staff are perceived as “working for” government or outside agencies rather than solely for the community.
- 4.17. Our team members also have to navigate family group conflict in their roles. Many communities have multiple large family groups with historic and ongoing conflicts. When children from opposing family groups are in the same safe house, staff may be caught in the middle of long-standing disputes, creating safety, operational, and wellbeing challenges. Staff may themselves belong to one of these family groups, which can complicate neutrality and lead to

allegations of bias.

4.18. Act for Kids safe house care staff also carry an emotional and cultural load. Caring for children who have experienced trauma, while also navigating their own family's challenges in the same small community, results in high emotional fatigue. There can be stigma attached to working in the safehouse - especially if the placement involves children removed from within the staff member's extended family. In addition, many team members have their own trauma experiences through historical forced removal when they themselves were children.

4.19. The safe houses are also subject to operational disruptions unlike those of other residential care services. Community unrest, local disputes, or events like alcohol-related disturbances can directly impact safehouse operations and staff attendance. Conflict spill-over can occur when disputes in the community are brought into the workplace.

4.20. In addition to the unique geographical and cultural settings for safe house operations, the workforce has extra challenges related to poor schooling standards, poor availability of schooling, especially high school and lack of employment opportunities. A recent Queensland Cabinet and Ministerial review reported that the average language, literacy and numeracy competence of Aboriginal and Torres Strait Islander people (over 15 years of age) in the Cape and Gulf was between a grade three and grade five level. Approximately 70% of our team members in the Cape listed English as their second, third or fourth language. Poor literary and numeracy levels also contribute to the low number of staff who hold a current driver's license, with 58 out of 88 (65.9%) active staff members holding a current license.

4.21. Over the last 15 years, Act for Kids has invested in multiple literacy and numeracy, health and wellbeing, and training programs for team members through philanthropic grants and fundraising. The cost of training is considerable and very complicated for a workforce with such low literacy and numeracy levels and where English is not first language. Below is a list of the annual training undertaken by our team members, facilitated on the job within the safe houses by our Program Coordinators and Practice Quality Consultant using in vivo methods rather than didactic learning.

4.21.1. Mandatory training:

- Fire Training
- Child Protection – Safe Practice and Reporting
- Positive Behaviour Support
- Standards of Care
- Recognising and Reporting Harm Towards Children
- Restrictive and Prohibitive Practices
- Care of Children in Culture
- Cultural Safety – Trauma Informed Care

- Hope and Healing
- Managing High Risk Behaviours
- Incident Reporting
- Work Health and Safety Mandatory Training
- Mandatory Reporting Requirements in Queensland
- Water Safety
- Medication and Medical Incident Management
- Inclusion Awareness – First Nations
- Privacy
- First Aid

4.21.2. Other training:

- Code of Conduct Policy
- Child Protection and Child Safe Policy
- Being Safe When Working
- Care Planning
- Case Notes and Family Case Notes
- NAQ Nutrition – Level 1 Safe Food Handling
- Managing Aggressive/Challenging Behaviour
- Bullying, Harassment and Discrimination
- Co-Regulation and De-Escalation
- Vehicle Child Restraint Fittings
- Care of Children in Culture
- Introduction to Protective Behaviours Principles
- Mental Health Essentials
- Ride on Mower Procedure and Safety
- Therapeutic Crisis Intervention
- Driver Safety Training

4.22. A further cost, which the Department expects to be paid from the contract recurrent funding, is the cost of licensing and accreditation compliance. Act for Kids has been a licensed care provider since 2012. The costs of external auditors, travel, accommodation and food for auditors, every 12 – 18 months across our organisation is significant. Including the specialist roles we have had to employ to manage the ever increasing burden of compliance, the cost is more than \$200,000 annually. The safe houses and Sibling House not only have the recurrent Human Services Quality Framework recertification and maintenance audits, they also undergo four announced/planned licensing audits and four unannounced licensing audits undertaken by Child Safety Services staff annually. Thus in most years, each house and staff are audited nine times.

4.23. In summary, from Act for Kids' perspective, the cost of delivering the safe house services has increased over the time of our contracts, with the recurrent funding not actually keeping up with the costs. In the last financial year, the average cost per child placed in all our residential care settings was

approximately \$105,000 for the year. Compared to the cost for a significant number of children in commercial care, or in care with other providers, this is modest.

4.24. The model of care provided by safe houses is not like other residential care settings. Section 3.1 of the original Service Agreement (2009) had a General Provision:

4.24.1. *The residential care and family intervention service provider (if not a local organisation) is expected to formally work in a partnership with the local Aboriginal and/or Torres Strait Islander community and/or local council and/or local non-government agencies to build, over time, a local Aboriginal or Torres Strait Islander owned and managed service. This includes developing a local Indigenous workforce. The service provider must establish formal partnership arrangements which include provisions in relation to authority structures, decision making, conflict resolution, processes for skills sharing/upgrading and transfer of auspice.* (p.30 original Service Agreement, 2009).

4.25. In 2008, Act for Kids was invited to apply for the safe houses in the Western Cape York Peninsula by the then Western Cape York Peninsula Traditional Owners Corporation (now defunct). The Traditional Owners of the Cape communities partnered with Act for Kids in local reference groups.

4.26. Over the last decade of Act for Kids' delivery of safe house services in Napranum, Aurukun, Kowanyama, Pormpuraaw and Doomadgee, we have endeavoured to fulfil the responsibilities outlined in the above general provision of the original agreement. We have been committed to this despite the provision being removed from the funding schedule in 2012. Over this period we:

- Held an initial conference in Cairns in 2008 with Traditional Owners from the Western Cape York Peninsula safe house communities and formalised our partnership and joint commitment to children and young people.
- Developed representative community Reference Groups from which we seek cultural and community expertise, guidance and approval for safe house service delivery (including approval for staff to work in community). Those Reference Groups have been in place since that time.
- Commissioned research from SVA Consulting to develop stakeholder program logic models for outcomes from the safe houses, in particular seeking community opinions on "ownership" and "transfer of auspice".
- Commissioned community consultation research from Monash University to further explore and understand community expectations and beliefs around "ownership" and "transfer of auspice".
- A team that included a Doomadgee Traditional Owner, Act for Kids SafeKIDS leaders and Monash Researchers presented the

research findings and process of engaging with communities to the National Diversity Conference in Darwin.

- Held a SafeKIDS conference in Cairns where we discussed the matter in greater detail with Traditional Owners, Reference Groups, staff and Far North Queensland Departmental leaders.
- Worked with Reference Groups and Child Safety Services to successfully reunify more than 130 children with family and kin through the safe houses (prior to 2020 and the Tertiary Family Support funding ceasing).

4.27. In 2015, the Department requested that we divide the funding for the four Cape York safe houses into five so a new house in Cairns could be funded. The capacity of the safe houses was reduced from six children to four and the new Cairns house was established for large Aboriginal and/or Torres Strait Islander sibling groups with the aim of reunifying them with family. The Cairns house became known as Family Reunification House. The model included placement for large Indigenous sibling groups for up to a year, with parents actively participating in care over that period to the point of the children moving in with parents.

4.28. In the last two years, the Department has expressed a desire to place children other than siblings in the house due to their need to place more children, creating a residential setting rather than a reunification or sibling setting. Act for Kids has resisted this as we believe in the reunification model. However, we recently came to an agreement with the Department about placement of young Aboriginal and Torres Strait Islander children in smaller sibling groups. The house is now known as the Sibling House.

5. Conclusion

5.1. Act for Kids thanks the Commission for the opportunity to provide information to inform decisions that create better outcomes for children and young people in Queensland, especially First Nations children who are disproportionately impacted.

5.2. This submission has been prepared by Act for Kids' team of experts. We would be willing to share further insights if the Commission team would find this of value.

Yours sincerely

Katrina Lines

Dr Katrina Lines
Chief Executive Officer