

## NAPCAN Submission to the Commission of Enquiry – Child Safety Queensland

27th October 2025

### About NAPCAN

The National Association for Prevention of Child Abuse and Neglect (NAPCAN) has been working for over 35 years to prevent child abuse and neglect across Australia. Our focus is on building safer communities for children through prevention, workforce development, and advocacy.

NAPCAN delivers national and state-based programs including training in Prevention of Child Abuse and Neglect- Mandatory Reporting and Child Safe Organisations training; Respectful Relationship Education *Love Bites* and Safer Communities for Children - Protective Behaviours programs. We are deeply committed to ensuring that all children grow up safe, connected, and supported in their families and communities.

### Introduction

NAPCAN welcomes the opportunity to provide input to the Commission of Enquiry into Child Safety in Queensland. We commend the Queensland Government for undertaking this critical review and for placing prevention at the centre of its focus.

The current system invests heavily in statutory and crisis responses. While these responses are essential for immediate safety, they are not sufficient to deliver long-term change. A truly effective child safety system must balance urgent protection with prevention strategies, early intervention, and strong systemic accountability.

Queensland has made important progress in recent years, particularly through implementation of the Royal Commission into Institutional Responses to Child Sexual Abuse recommendations. Advances such as the Child Safe Organisations legislation, Blue Card reforms, and the establishment of a reportable conduct scheme represent significant steps forward and the fast tracking of this scheme commended.

Our submission highlights four key areas for reform that align with the Commission's Terms of Reference and NAPCAN's prevention mandate.

## 1. Invest in Prevention to Reduce Children Entering Care

Queensland continues to experience high rates of children entering out-of-home care. Many of these children could have safely remained with their families if earlier, targeted support had been available. Evidence consistently demonstrates that investing in early childhood services, family support, and community-led prevention not only improves outcomes for children and families but also reduces long-term costs to the system. This aligns with findings from the *Cost of Not Preventing Child Abuse and Neglect* report, which highlights the economic and social consequences of reactive rather than preventative approaches.

To meaningfully reduce the number of children entering care, prevention must be prioritised through sustainable funding for family support services, universal parenting programs, and Aboriginal and Torres Strait Islander community-controlled initiatives.

**Recommendation:** Redirect a proportion of out-of-home care expenditure into prevention and early intervention programs, with clearly defined targets to reduce reliance on the out-of-home care system.

## 2. Workforce Challenges - strengthen capability in child safety

Queensland's child safety system continues to face significant workforce challenges, including high turnover, staff burnout, and inconsistencies in training. These factors undermine the quality and continuity of support provided to children and families, particularly those at risk of entering out-of-home care.

To strengthen the system, comprehensive training in prevention-focused mandatory reporting, Child Safe Organisations (CSO), cultural safety, trauma-informed practice, and contextual safeguarding must be mandated and made accessible across both government and non-government sectors. This training should be delivered both pre-service and as ongoing professional development.

In addition, supervision, coaching, reflective practice, and workforce wellbeing strategies must be embedded throughout the system to ensure effective implementation of safeguarding practices and support for practitioners.

**Recommendation:** Develop a state-wide workforce capability framework and expand funding in training and implementation support across the above mentioned programs and ongoing professional development for all sectors working with children and families.

### 3. Children and Young People Have a Mechanism to Raise Concerns

Children and families often find existing complaints processes intimidating, confusing, and ineffective, which can prevent concerns from being raised and addressed. Independent, accessible, and safe complaints pathways are essential to build accountability, transparency, and trust in the child safety system.

Young people in care, in particular, should have direct access to advocacy services and independent review bodies to ensure their voices are heard and acted upon.

It is acknowledged that the Queensland Child Safety Commission of Inquiry has prioritised reviewing the complaints system for those working and caring for children in the sector.

**Recommendation:** Establish a dedicated, independent child and youth complaints mechanism to provide a clear, safe, and accessible pathway for raising concerns and seeking resolution.

### 4. Unregulated Sectors with High Child Participation

A critical area requiring attention is sectors where large numbers of children and young people participate, yet which are not currently regulated under Blue Card or child-safe laws. These environments include, for example, dance schools, youth-led online platforms, eSports, and influencer spaces.

These sectors can carry high risks of harm due to limited governance, reliance on volunteers, and rapid digital innovation. The Royal Commission explicitly warned against such gaps in coverage, yet these risks persist in Queensland. While the recent fast-tracking of the Reportable Conduct Scheme is a positive development and welcomed, it currently does not cover many high-participation settings, such as all dance schools or digital youth platforms.

To protect children in these environments, it is essential to expand child safe and reportable conduct obligations to all organisations with significant child participation, particularly those outside traditional statutory or service-based sectors. Clear guidance, training, and resourcing must accompany this expansion to ensure volunteer-driven or community-based groups can comply effectively and create safe environments for children.

**Recommendation:** While the fast-tracking of the Reportable Conduct Scheme is welcomed, it should be expanded to cover all organisations with significant child

participation, including currently unregulated sectors, and accompanied by targeted support, guidance, and funding to enable compliance.

## Conclusion

Queensland has an opportunity to create a child safety system that is not only responsive in crisis but proactive in prevention. By investing in prevention, mandating child participation, building workforce capability, resourcing NGOs and peaks, strengthening complaints mechanisms, support for the implementation and expansion of the reportable conduct scheme, the state can deliver a system that is safer, fairer, and more effective for all children.

NAPCAN strongly urges the Commission to adopt a prevention-focused lens that:

- Strengthens families before crises occur,
- Elevates the voices of children and young people, and
- Builds an accountable, culturally safe, and child-centred system.

We thank the Commission for the opportunity to contribute and would welcome further dialogue to support the inquiry.

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