

Submission for the Commission of Inquiry into Queensland's Child Safety System with a focus on Complaints Systems

"They won't start helping you unless you're standing out for the wrong reasons. Once police or ambulances get involved, then they'll take you seriously."

Young person, CREATE Youth Advisory Group 2025

"Listen to the young person. It took me from 9 years old until I was fourteen years old to say that this is not a safe environment for me and my siblings (with my foster parents at the time). I would go to Child Safety myself and tell them to remove me from that placement. I said 'you guys will get sued if you don't move me.'"

Young person, CREATE Youth Advisory Group 2025

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About CREATE Foundation

The CREATE Foundation is the national consumer peak body for children and young people with an out-of-home care experience. We represent the voices of over 45,000 children and young people currently in care, and those who have transitioned from care, up to the age of 25. Our vision is that all children and young people with a care experience reach their full potential. Our mission is to create a better life for children and young people in care.

To do this we:

- **CONNECT** children and young people to each other, CREATE and their community to
- **EMPOWER** children and young people to build self-confidence, self-esteem, and skills that enable them to have a voice and be heard to
- **CHANGE** the systems impacting children and young people, in consultation with them, through advocacy to improve policies, practices and services and increase community awareness.

We achieve our mission by facilitating a variety of programs for children and young people with a statutory care experience and advocating for system changes to improve their experiences and outcomes.



Introduction

CREATE Foundation welcomes the opportunity to provide feedback and recommendations regarding the adequacy of existing complaints systems, procedures and incident reporting guidelines for those wishing to raise safety concerns about children under the care of the state, including in relation to residential care facilities.

Robust complaints systems and procedures are crucial to support the safety, health and wellbeing of the 12,700 young people growing up in Queensland's out-of-home care system. CREATE believe that children and young people's voices must be at the center of all decisions and systems that impact their lives. This submission addresses questions around the adequacy of existing systems and procedures based on young people's perspectives shared with us through our core programs and consultations.

Insights and recommendations

The insights from children and young people in care and with care experience in Queensland and recommendations for consideration are provided across the following themes in this submission:

1. Addressing young people's fears and concerns before they escalate into serious complaints and incidents.
2. A youth friendly and culturally sensitive complaints process.
3. Addressing serious complaints and incidents in an ethical and culturally sensitive manner that draws on lived experience.
4. Complaints and incidents specific to residential care facilities.

Child-friendly complaints process guide and toolkit developed for Queensland

CREATE Foundation was commissioned by the Queensland Department of Families, Seniors, Disability Services and Child Safety to design a child- friendly and contemporary complaints process for the child protection and out-of-home care system in Queensland as part of broader quality and safety reforms and system redesign.

A supporting toolkit was developed to ensure that implementation of the improvements to the complaints system is supported by child-friendly materials. The toolkit is designed by young people to encourage complaints, promotes supportive and engaging communication about the new process and changes for children and young people, is safe, and leads to clear actions and outcomes.

This work was undertaken as part of the 2024-2025 service contract between the department and CREATE Foundation. It was formally submitted to the department during the financial year. CREATE is continuing to work with the department to finalise details to support implementation of the report and toolkit. During the 2025-2026 financial year the department is expected to adopt and implement the guide.

The Child-friendly Complaints Process Guide and Toolkit is provided to assist the Commission of Inquiry at [Attachment 1](#). Please note that the documents have not yet been finalised, with minor edits underway prior to publication and distribution throughout Queensland's out-of-home care settings.



Insights and recommendations

1. Addressing young people's fears and concerns before they escalate into serious complaints and incidents

Young people have shared with us that they feel unheard, powerless, let down and sometimes even unsafe or out of control when the adults in their life and broader system do not listen to their fears and concerns. When not attended to in the early stages, these can escalate into serious complaints and incidents which all too often, are not adequately addressed. More specifically, young people with lived experience and expertise in the out-of-home care system have shared:

"[Ideally] you would feel validated, you would know that you can count on the workers and that you can go to them with any problems that you are having, and they will help you." Young person, CREATE Consultation 2025.

"They did not take me seriously. It got to the point where I had to nearly take my own life before they took me seriously." Young person, CREATE Youth Advisory Group 2024.

A common theme that young people have shared with us is around the impacts of under resourcing and high staff turnover within Child Safety, which means that they often lack positive relationships with skilled, stable and engaged caseworkers. This leads to a lack of relational safety in being able to raise and address concerns in the early stages. Conversely, young people who felt that they had a strong and consistent relationship with their Child Safety Officer (CSO) felt safe and supported.

"I have had about nine CSOs since I have been in care." Young person, CREATE Youth Advisory Group 2025

"For prolonged periods of time I had no caseworkers. You'd get appointed a new caseworker and wouldn't be told. Then they would leave or never turn up and you would find out you got a new one, but you'd never met the old one." Young person, Youth Advisory Group 2024


"I had a good CSO. She was phenomenal and went above and beyond. She would always advocate for us kids. Unfortunately she had too much of a case load and had to drop out. It happens a lot. People get burned out." Young person, CREATE Youth Advisory Group 2024

Additionally, young people have described not understanding how the Community Visitor Program works or have reported that they do not receive regular visits. This undermines trusting relationships that may otherwise facilitate conversations about concerns before they escalate into serious complaints.

"I haven't seen her [Community Visitor] for a while. She used to come to the house and talk to me but I am not sure why." Young person, Youth Advisory Group 2025

"I thought that Community Visitors worked for Child Safety until I did the [CREATE] Speak Up program and now I am more likely to ask for things I need." Young person, CREATE Youth Advisory Group 2025

First Nations young people have shared that they believe that increased visits from Aboriginal and Torres Strait Islander Liaison officers or similar roles would also facilitate the disclosure of concerns in the early stages and bolster feelings of safety and the capacity to raise concerns about matters of importance.



“There needs to be more Aboriginal Liaison Officers coming into residential care homes. There needs to be better communication between Child Safety and their mob because right now the communication is not happening.” Young person, CREATE Youth Advisory Group 2025

Young people have highlighted that despite the above concerns, sometimes there are a range of trusted others who might be able to advocate for young people’s needs. This may include family members, carers, workers, friends, teachers or leaders of recreational programs.

“I have a really good teacher at school. She checks on me most days.” Young person, CREATE Youth Advisory Group 2025

CREATE recommends:

1.1 Boosting the Community Visitor program to ensure regular visits that provide young people with information about their rights in care and support to address concerns and complaints in the early stages.

1.2 Bolster the capacity for Aboriginal and Torres Strait Islander Cultural Practice Advisors and Child Safety Support Officers to engage with young people regularly in order to build trust, facilitate the sharing of concerns and to support complaints processes in the early stages.

1.3 Provide clear and accessible information about complaints processes and mechanisms to schools and community groups that young people come into contact with. In many instances young people share their concerns with trusted others outside of the child safety system in the first instance. These individuals may be able to support young people to reach resolutions or access complaints systems.

1.4 Consider a peer navigator model to enable young people with lived experience of out-of-home care to be trained and supported to provide education about complaints systems, support and advocacy to other young people still in care, to enhance feelings of being understood and to provide relational continuity when staff turnover is high.



2. A youth friendly and culturally sensitive complaints process

Based on many years of consultation with young people around best practice complaints systems, CREATE has long advocated for a robust complaints systems that is youth-centered, accessible, independent and transparent.

Young people have shared with us some of the barriers to making complaints, including not knowing how, not believing that anything would change, or perceiving it to be a difficult or daunting process. Young people have also shared with us their ideas for what would constitute a good complaints system.

“The complaints service needs to be followed through. I feel like a lot of complaints don’t get followed through by a lot of people.” Young person, CREATE Youth Advisory Group 2024

“Young people should be involved in all of it. Receive regular updates of where in the process it’s sitting.” Young person, CREATE consultation 2025

“Our complaints don’t get resolved. They don’t believe us kids in care.” Young person, CREATE Youth Advisory Group 2024

CREATE recommends:

2.1 A complaints process that provides information in simple and age-appropriate language and that is available through a range of youth friendly forms (e.g. simple written language, infographics and videos).

2.2 A process that allows complaints to be lodged through multiple formats (online, telephone and in person).

2.3 A process that is culturally safe and trauma informed.

2.4 Design and implement a digital mechanism for young people to track and see the ‘status’ of a complaint. This would ensure that even if complaints cannot be responded to or addressed quickly, that information is available, enabling young people to feel that ‘somebody is listening.’

2.5 Clear and transparent timelines should be communicated, with all complaints receiving a response.

2.6 Supporting young people to understand that different complaints may be triaged differently depending on severity and provide transparency about this. For example, when lodging a complaint electronically, young people could be invited to rank the severity using a scale with relevant symbols threshold questions, or examples. Severe concerns are where a risk of harm exists or an inability to access vital physical or mental health care.

2.7 Clear information should be provided about options if young people have additional concerns through the process, enabling them to raise further complaints if their level of risk escalates. This should include a complaints body that is independent of the government department or service provider organisation where the complaint originated.

2.8 Mechanisms to enable input from other individuals who might be able to support or advocate for the young person in the complaints process.



3. Addressing serious complaints and incidents in an ethical and culturally sensitive manner that draws on lived experience

CREATE has heard from young people that when matters escalate and become serious complaints or incidents, it is important to them to be able to raise complaints outside of the service provider organisation or government department where the complaint originated. This is due to young people's experiences of and worries about not being believed and adverse consequences of complaining (which could include impacts on their quality of care or decisions that impact their lives). Young people have even shared with us examples of being 'punished' for making complaints.

First Nations young people have shared with us that it is important to them to be able to speak to and receive support from other Aboriginal and Torres Strait Islander people when they raise sensitive matters such as complaints.

"I want to feel like they believe me." Young person, CREATE consultation 2025

"[When a complaint is made] youth workers get angry and turn it against you and lash out at you." Young person, CREATE Youth Advisory Group 2024

"I'm Aboriginal myself, and going through the complaints line, black people get picked on the most and you get judged for being black... It would be better if my culture was more okay and I could talk to similar people." Young person, CREATE Youth Advisory Group, 2024

CREATE recommends:

3.1 The establishment of an independent, external complaints body to manage complaints that cannot be addressed and must be escalated beyond the service provider organisation or government department where the complaint originated. This would support young people, as well as workers and other parties, to raise serious complaints (included those related to health and safety) without fear of retaliation.

3.2 A model that prioritises the inclusion and support of Aboriginal and Torres Strait Islander workers within an external complaints body to support cultural safety for First Nations young people and community members engaging in the complaints process.

3.3 Ensuring that a young person lived experience oversight group is developed to work with the independent complaints body to co-lead the monitoring of complaints received and the responses to and outcomes of the complaints process.

3.4 Collaboration with Aboriginal and Torres Strait Islander Community Controlled Organisations and peak bodies such as QATSICPP to ensure that First Nations ways of knowing and lived experience is incorporated into the design and ongoing governance of complaints systems.

3.5 The independent complaints body should regularly review recurring themes to address systemic issues that are identified.



4. Complaints and incidents specific to residential care facilities

Based on feedback from children and young people, CREATE believes that there is significant room for improvement in relation to complaints processes for children and young people growing up in residential care. Young people have shared that they want to be consulted with and included in the processes and decisions that impact them.

“I feel like a lot of complaints don’t get followed through by a lot of people. I was in resi care myself and every time I made a complaint, it wouldn’t go to Child Safety – it would just go to the General Manager of the resi house.” Young person, CREATE Youth Advisory Group 2024

“I felt like I wasn’t heard. Every time I made a complaint, they would believe the workers over me.” Young person, CREATE Youth Advisory Group 2024

In addition to the general recommendations already outlined in this submission, the following should be considered to improve the complaints systems and procedures that relate to residential care facilities.

CREATE recommends:

4.1 Introduce a regulatory model for all residential care providers in Queensland and mandate the requirement for robust feedback and complaints processes for all residential care providers.

4.2 In addition to internal complaints mechanisms, ensure that complaints can be escalated to an independent, external complaints body where necessary.

4.3 As a part of regulating residential care providers, mandatory clinical supervision for all residential care staff should be considered as a crucial mechanism in ensuring that workers receive appropriate support to respond sensitively when informal concerns or complaints are raised by young people on a daily basis. This may also help to prevent unnecessary escalation.

4.4 As a part of regulating residential care providers, ensure that internal processes exist which support young people to learn about complaints processes and to provide regular feedback on organisation-specific complaints processes to ensure that they are working well and are ‘young person friendly.’ There is nobody better able to provide this feedback on whether internal feedback and complaints processes are working for young people than young people themselves.

4.5 As a part of regulation, residential care providers should be required to report on complaints and incidents and the organisations response to these.



Conclusion

Thank you for the opportunity to provide feedback on complaints systems as a part of the Commission of Inquiry into Queensland's Child Safety System.

By considering the implementation of the recommendations raised, young people would be better supported to raise fears and concerns early to help prevent escalation into serious complaints and incidents. In instances where serious complaints or incidents occur, through an accessible, youth-friendly, transparent and independent complaints process, young people would be better supported to collaborate around resolutions and have their serious safety concerns addressed.

Should you have any questions or require additional information, please contact the CREATE Foundation. E: advocacy@create.org.au

Attachments

1. Child-friendly Complaints Process Guide and Toolkit

1.1 Young Person Complaints Process overview: provides an overview of the process design for Queensland government, out of home-care providers, families and young people.

1.2 Young Person-Friendly Complaints Process: describes the recommendations and processes for young people.

1.3 Your rights in care: describes child rights and expectations of living in care.

1.4 You have a right to complain: describes the right to complain and supports speaking up.

1.5 Who should I complaint to?: describes who young people can complain to.