



**Family  
Inclusion  
Network**

Valuing children  
Partnering with families  
Embracing diversity

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1 August 2025

The Honourable Mr Paul Anastassiou KC  
Commissioner  
Child Safety Commission of Inquiry  
[info@childsafetyinquiry.qld.gov.au](mailto:info@childsafetyinquiry.qld.gov.au)

Dear Mr Anastassiou

### **Call for Submissions: Complaints System - 1 July 2025**

We are pleased to provide the following in response to the Commission of Inquiry into Queensland's Child Safety System's invitation for public submissions into the Complaints System.

The invitation describes the scope as –

*"...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"*

*"This includes safety and other concerns in relation to:*

- residential care facilities,*
- foster and kinship care placements, and*
- services delivered by funded service providers."*

[\(Call for Submissions: Complaints System - 1 July 2025\)](#)

### **The Family Inclusion Network (FIN) Southeast Queensland**

The Family Inclusion Network (FIN) in Southeast Queensland is a small network of parents and their allies working to improve the child protection and family support system. FIN aspires to bring together parents with lived (and living) experience, with government and non-government agencies, to work collaboratively on policies and issues that affect families experiencing the child protection system.

The Family Inclusion Network is an activity of Micah Projects.

### **Child Safety Complaints Process – previous suggestions**

Over the years, parents' dissatisfaction with the Child Safety complaint process has been a consistent theme.

Changes to the Child Safety complaints system were introduced in approx. 2020 as a result of the Queensland Ombudsman's - Management of child safety complaints - second report (March 2020), and similar reports.

However, in November 2022, after continuing to hear about the complaints system not working optimally for families, FIN again sought parents' views. Their experiences are [summarised in the attached paper](#) - which is **submitted for the consideration of the Inquiry**.

*"If you make too many complaints they use this against you... to make it look like you have the problem." (Parent).*

In mid-2023, the Department provided some response in the form of a draft 'flowchart'. While this response was welcomed (a flowchart had been one of the suggestions of parents) and the draft was comprehensive, it was also complex to read. FIN did not believe that the draft flowchart adequately addressed the range of concerns raised nor suggestions made.

The key suggestion from FIN at the time was **independence** (and this remains our position). The complaint system should ***never divert a parent back to the worker to whom the initial complaint pertains.***

*"All they do is refer your complaint to the person you complained about!"  
"You...get contacted by the very people you have the issues with." (Parent)*

### **Safety of children in care / 'Standard of Care'**

By the nature of its work and relationship with parents, FIN does hear parents raise concerns for the contemporary wellbeing of their child/ren and/or young people living in residential care facilities, or foster or kinship care placements. (Many times the concern comes from a family where Domestic and Family Violence has been experienced. The concern relates to children who are placed by the Department with the parent who has used violence or one of their relatives.)

Given the difficulties parents face with the complaints system (attached), FIN is curious about what alternative avenues exist for these concerns. It has been variously suggested that:

- this is not a 'notification' – that is, people would not 'call Child Safety' about this, because the child is already *with* Child safety.
- this is a complaint (which, as mentioned, many parents are unable or reticent to participate in or re-participate in).
- this is also a 'standard of care' notice – whereby the concern should be raised by the parent to their day-to-day CSO. (This is potentially problematic, because it is reasonable to expect that sometimes the relationship, trust and communication channels between a parent and the CSO are not optimal.)

Within this context, parents' concerns for the wellbeing of their child/ren:

- may not always be **expressed** to the appropriate person,
- may not always be **received**, documented and processed appropriately; and/or
- may not always be objectively and appropriately **responded** to.

## Communication Plans

In an environment of high emotion and complex load (for both families *and* workers) parents will often feel unheard; as a result, they may communicate persistently with the Department. At some point, if this becomes untenable for the Department, the parent will be issued with a 'communication plan' that defines how, when, and how often they are permitted to communicate with the Department. It will sometimes specify a generic communication channel through which to do so.

We recognise the significant challenges and complexity of Child Safety service delivery work, and we strongly support everyone's right to safety and respect in the workplace. **However, in the context of this Submission: FIN raises the question of how parents may be better able to raise concerns about the safety and wellbeing of their child/ren and/or young people who are placed by the system.**

## Summary of Suggestions

The following summarises FIN's suggestions – inclusive of the five (5) suggestions made in 2022, and a further one (1) further pertaining to the safety of children and 'standard of care'.

1. The complaints process to be outsourced to an **external department or body independent** of Child Safety. (2022)
2. The creation of an **advocate/mediator role**, for the parent, within this independent body. (2022)
3. Communication of a **simple step-by-step complaints process** (in the form of a flow chart) including both the complainant and Department's roles and responsibilities, and to include firm timelines and expectations. (2022)
4. Throughout the complaint process, **support should always be available**, for the parents, the children/young people, and the family as a whole. (2022)
5. A summary of **substantiated complaints should be made available** to the public to keep the department accountable and to enhance public awareness of what issues families face in this system. (2022)
6. **NEW** – an outsourced external department or body (independent of Child Safety) able to receive '**standard of care**' complaints seven days a week. (2025)



## CHILD SAFETY COMPLAINTS PROCESS— PARENT FEEDBACK 2022

*“It feels as if the whole thing exists just so that the Department can claim accountability - “see, there’s an avenue parents can use to have their voices heard!” (Parent)*

### **The Family Inclusion Network (FIN) Southeast Queensland**

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### **Background**

Over the years, dissatisfaction with the Child Safety complaint process has been a consistent theme when parents have engaged with FIN.

FIN understands that changes to the Child Safety complaints system were introduced in 2020/2021 as a result of the [Queensland Ombudsman’s - Management of child safety complaints – second report \(March 2020\)](#). This report followed an earlier Ombudsman investigation into the then Department of Communities, Child Safety and Disability Services’ management of Child Safety complaints (2016).

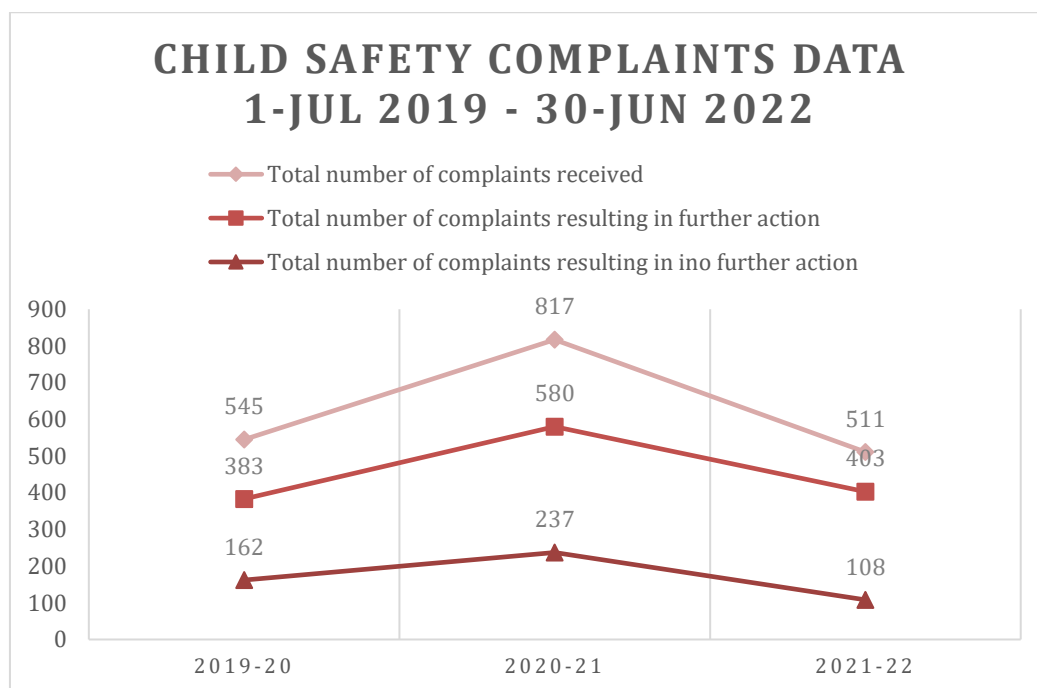
The Ombudsman stated, “the department’s complaints management system is crucial to ensuring any clients’ concerns with the actions and decisions of the department in administering Queensland’s child protection system can be raised and rectified appropriately” (2020).

In June 2020, FIN was consulted on intended changes to the complaints system.

## Number of complaints

The department is required to publish annual data on complaints.

These figures show an increase and then more recently (in the year to 30 June 2022) a decrease. As stated, FIN was consulted regarding changes to the system in April 2020 – so it is assumed that changes occurred to the complaints system in the 2020-21 year.



In the most recent period (between 1/7/21 and 30/6/22), 511 complaints\* were received. Of those, *only 28 complaints were sent for an internal review* and of those 28 complaints, all of them resulted in further action. The other 483 complaints were represented by -

- 375 complaints resulting in further action and
- 108 complaints resulting in no further action.

## FIN asked parents about their experiences

FIN members consider it *very important* for parents to voice their concerns and be involved as much as possible in working with the Department to improve different parts of the system for all involved.

In November 2022, after hearing more often about the complaints system not working for families, FIN emailed parent members and asked their views.

Parents were asked four questions -

1. Have you used the Department's Complaints Process recently (2020-22)?
2. Briefly, what opinion do you now have about the Complaints Process?
3. Can you suggest anything that might improve the Complaints Process?
4. Can you name something that worked well?

## What parents said

From the feedback FIN received, it's apparent that there are things that parents would like to see improved. What follows is a summary of parents' views, comments on the issues they have faced, and suggestions on how it could be done differently.

All but one of the responding parents had accessed the Department's complaints process at some point within the last three years. The one parent who had not accessed this process wished to do so but was put off by anecdotal evidence that it would be pointless and traumatic.

*"If you make too many complaints they use this against you...to make it look like **you** have the problem." (Parent).*

According to parents, the current complaints process is "useless", with nearly half of responding parents using this term.

Other words to describe the process included: "tokenistic", "ridiculous", "biased", "a joke", "a front", "a complete waste of time", "poor at best", "evil", and "negative on all fronts".

Some parents acknowledged the staff working to administer a very challenging process.

*"Whilst the person assigned to my complaint was nice enough, no actual help, support or justice was obtained from utilising the service." (Parent)*

*"It's two people in a small office ... they in fact do not have the staff to even keep up..." (Parent)*

More than a quarter of parents said they couldn't name anything that had worked well for them in the current complaints process.

*"All they do is refer your complaint to the person you complained about!"  
"You...get contacted by the **very** people you have the issues with."  
(Parent)*

*"They put me straight through to the office I was trying to make a complaint about!" (Parent)*

Parents had numerous suggestions of how the complaints process could be improved:

- Half of responding parents recognised the need for the complaints section to be **externally and independently operated** in an unbiased manner neither connected to nor funded by the Department.

*“How are they going to ethically police themselves?” (Parent)*

*“It’s the Department investigating the Department, which is ridiculous.”  
(Parent)*

*“My child had contacted an independent rep and even they did not hold the Child Safety Office staff involved or the complaints to the department to account. When a child makes a complaint, there should be someone assigned to represent that child.” (Parent)*

Options around where an external and independent process could fit would be **a topic for further discussion**. This is because, other than the internal complaints process, there is already a web of possible other processes and avenues for parents to seek natural justice.

However, this web is confusing and excluding:

Is it an ‘internal complaint’ (which does not feel objective enough)? Is it a ‘reviewable decision’ via the Queensland Civil and Administrative Tribunal (QCAT)? Where does the Community Visitor within the Office of the Public Guardian fit for families seeking an independent person for their child to have a say? The Queensland Family and Child Commission’s website suggests “if you have a complaint about a child safety matter, contact the Queensland Ombudsman”. In which case, does the Ombudsman look at the substance of decisions, or are they confined to ensuring systems are established that comply with the ‘Australian/New Zealand Standard Guidelines for complaint management in organisations’?

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- Half of the parents suggested a **need for support** when putting in the complaint (and during the process), potentially in the form of *an advocate* with the ability to respectfully and impartially mediate between the Department and complainant. This included the option that complaints officers or advocates *speak with* people – as well as emailing.
  - Most of the parents also requested a **more transparent, easier to navigate process** with information given around reasonable timelines and next steps.

*“The complaint process needs to be easy and a transparent exercise aimed at finding solutions and advocating for the complainant.” (Parent)*

- Some parents mentioned the need for a higher and more public level of Departmental **accountability**, and potential monetary compensation for families in the event of

*substantiated harm to families as a result of poor decisions. As well as harsher ramifications for any departmental errors, or wrongdoings.*

- Some suggested regularly compiling **statistics** around complaints in order to advocate for policy and legislation changes, and to flag individual workers and centres with a high number of complaints.

*“I can’t think of **any** of my complaints that have been solved by the complaints process and the same issues continue”. (Parent)*

## Summary of Suggestions

The following summarises the key suggestions from parents. These would reinforce the **two-way commitment** made between the Department and parents in the *Charter of Rights for Parents (2022)*.

***Charter of Rights for Parents** – parents are respected in our role, have our voice heard, are treated with courtesy and dignity, receive all information in writing in a way that we understand and within a reasonable timeframe, and **are able to make a complaint or raise a concern without fear of reprisal.***

1. The complaints process to be outsourced to an external department or body **independent** of Child Safety.
2. The creation of an **advocate/mediator** role within this independent body.
3. Communication of a simple **step-by-step complaints process** (perhaps in the form of a flow chart) including both the complainant and Department’s roles and responsibilities, and to include firm timelines and expectations.
4. Throughout the complaint process **support** should always be available, for the parents, the children/young people, and the family as a whole.
5. A summary of substantiated complaints should be **made available to the public** to keep the department accountable and to enhance public awareness of what issues families face in this system.