

Telephone: [REDACTED]

Reference: [REDACTED]

Department of Youth Justice and Victim Support
PO BOX 15483
CITY EAST QLD 4002

Via email: [REDACTED]

Dear Youth Justice Commission Division

Thank you for the opportunity for the Queensland Family and Child Commission (QFCC) to contribute to the Youth Justice initiatives, *Regional Reset Program*, *Staying on Track*, and *Gold Standard Early Intervention*.

The industry briefing materials provided valuable context to these planned initiatives including the critical need for prevention, early intervention, and rehabilitation. The purpose of this letter is to outline my views on how the Department can design, commission, and deliver effective programs as a part of its current reforms.

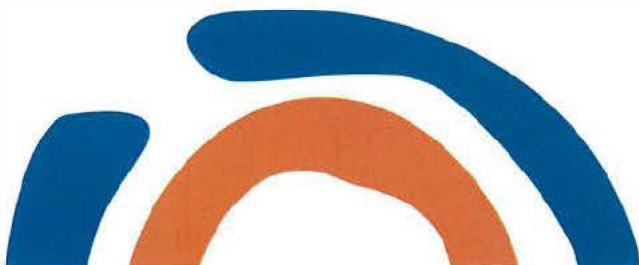
Role of QFCC and recent relevant work

The QFCC has a keen interest in the planned initiatives of the Department of Youth Justice and Victim Support as part of our responsibility to provide advice to government and monitor the performance of the youth justice system. The QFCC also hosts the Child Death Review Board (the Board), an independent body responsible for reviewing the deaths of children known to the child protection system.

The [Child Death Review Board Annual Report 2022-2023](#)¹ highlighted several key issues regarding youth offending, including the importance of a family-focused approach, and the need for community input to youth justice initiatives. The Queensland youth justice system aims to reduce offending, improve community safety, and provide opportunities for young people to change their lives. The system often falls short of these goals, however, with high rates of reoffending and a disproportionate representation of First Nations children within the youth justice system.

It is known that a significant number of young offenders have experienced complex trauma, abuse, and neglect, along with family dysfunction, poor educational engagement, mental health issues and substance use. The system's focus on "transactional justice," which primarily

¹ Queensland Child Death Review Board (2023). *Child Death Review Board Annual Report 2022-2023*. [Child Death Review Board Annual Report 2022-2023](#)



responds to specific offences rather than addressing underlying causes, has been shown to be ineffective. There's an increasing recognition of the need for a more holistic, relational approach that addresses the social determinants of health and provides long-term, personalised engagement with young people. A family-focused approach is also seen as crucial with the need for early intervention and support services. The findings from the Board emphasises that by working with families and providing support from the start of a child's life, adverse outcomes can be prevented. Communities need to have a voice and be included in decisions that affect their lives, particularly for those from culturally diverse backgrounds.

In 2024, the QFCC published an oversight report, *Exiting youth detention: Preventing crime by improving post-release support*² to explore the circumstances contributing to the high rates of recidivism and return to detention for young people. The *Report* recommended the funding and delivery of “a dedicated 12-month post-detention transition program that incorporates in-home family interventions and effective engagement in education, training and employment.” (Recommendation 1), and that the transition support under Recommendation 1 “should form part of a broader approach by the Queensland Government to target investment in a development approach to crime prevention. Programs and services developed as part of such investment must address risk factors and promote protective factors associated with youth crime” (Recommendation 2). We recognise the planned initiatives as part of broader implementation of recommendations made by the QFCC and the Board, and a system approach to community safety.

Overall feedback: The role of family and parents

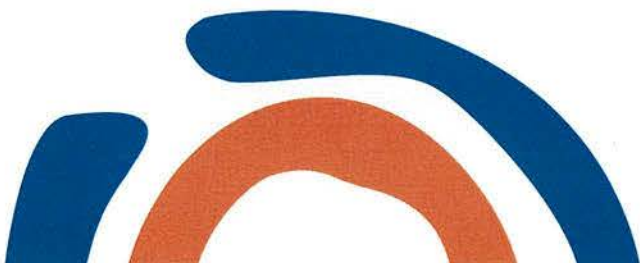
For all of the planned initiatives—*Gold Standard Early Intervention*, the *Staying on Track* program, and the *Regional Reset* program—genuine and sustained engagement with families must be central to the service delivery model.

I firmly believe, based on evidence and experience, that the power of coordinated family intensive intervention will be the most effective initiative in preventing youth offending.³ This approach not only offers a more supportive and rehabilitative environment, but it also strengthens family bonds and provides the necessary tools for lasting positive change. By focusing on personalised care and family involvement, young people and their families have the opportunity to holistically address underlying issues that contribute to criminal behaviour. Family-based intervention initiatives can offer a more constructive and transformative path away from antisocial behaviour and offending, ultimately reducing recidivism and helping youth build a brighter future.

This approach should also recognise the impact and importance of connections – including where the absence of a family connection, or where specific connections are toxic to a young

² Queensland Family and Child Commission (2024). *Exiting youth detention: Preventing crime by improving post-release support*. [Microsoft Word - Exiting detention report 24 May 2024 - \(Designed 7 June\)](#)

³ Principal Commissioner Luke Twyford, Queensland Family and Child Commission (2024), *Submission to the Inquiry into Australia's youth justice and incarceration system*. [QFCC Submission - Youth Justice and Incarceration - Federal - Oct 2024.pdf](#)



persons wellbeing and behaviour, society can play a role in providing positive connections. Getting parents, families or alternatively adult connections involved in pro-social life pathways of young people is critical.

Specific Feedback: Gold Standard Early Intervention

I support the Department's commitment to piloting new interventions and expanding on proven approaches to youth offending, rehabilitation, and community engagement and what is already known to work.

I would welcome the opportunity for the QFCC to contribute to, lead, or partner with the assessment panel and/or the ongoing monitoring of successful tenderers.

The QFCC will call for transparency regarding which organisations are receiving funding under the planned initiatives, where they operate, and the specific populations they work with. This will include us putting our minds to the integrity, interconnection and long-term sustainability of these programs.

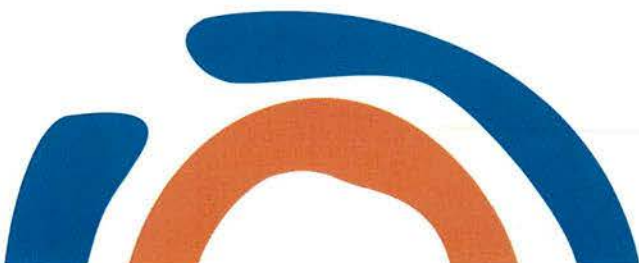
The Department's upcoming tender process for service providers under the *Gold Standard Early Intervention* and indeed all of the planned initiatives, presents an opportunity to establish a sustainable and effective service delivery model.

In making its funding decisions, the Department will need to balance between: a small number of providers offering cohesive services across the state, or more numerous diverse providers operating in different geographic regions. It is essential that there is balance of consistent statewide service delivery with local, placed-based solutions – and that both offer coordinated cross-portfolio programs. I therefore urge the Department to foster a Community of Practice, which would enable the sharing of knowledge and success stories, as well as the professionalisation of the youth justice NGO workforce across the state.

Specific Feedback: Regional Reset Programs

The *Regional Reset* program involving intensive support, including a live-in component, to address high-risk presentations including substance use and violence, and aiming to divert young people who are engaged in anti-social behaviour and toward education, counselling, training, community participation, and life skills, will provide a positive new support response for the system. However, as outlined above, an intervention program for support in the community must engage with the family unit in order to deliver a holistic, preventative service which promotes pro-social activity.

Family engagement is a key element in responding to emerging concerns and anti-social behaviours. The QFCC's *Exiting youth detention* report highlighted the experiences of young people in their transition from custody and detailed the importance of strong community support to prevent return to criminal activity and promote pro-social engagement with family and community. Consent must be considered in the design and delivery of the *Regional Reset* and *Staying on Track* programs, from both the young person and their family; meaningful,



active engagement with parents, siblings, and the wider family unit will be important to the success of each young person's experience in the program. In this regard, we support the potential for young people to be engaged in a *Regional Reset* program as an alternative to a supervision order or custodial detention, allowing for a more holistic approach to rehabilitation.

Specific Feedback: Staying on Track program

In recent reviews and submissions, the QFCC has highlighted the need for greater, more intentional post-release support for young people as they transition back into the community from detention. The implementation of a 12-month case management for young people post-release, represents a significant step toward improving outcomes for youth exiting detention.

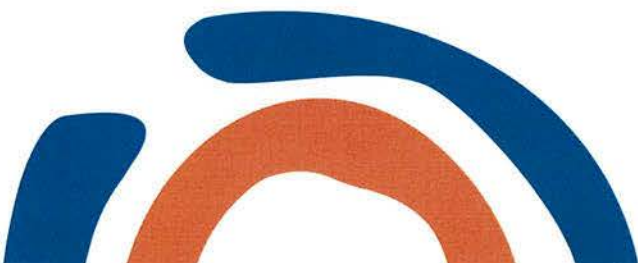
The industry briefing information advised that the *Staying on Track* program will include tailored support plans for each young person, will focus on pathways to education and employment in the 12-months following their release, with an aim to set young people up for active participation in study, work, community involvement, sports, and independence including driving and professional mentoring.

I believe that the inclusion criteria for the cohort of participants in the *Staying on Track*, post-release program will be incredibly important. Whilst there are certainly benefits of an extended transition support program following release from custody, not all young people exiting detention should automatically be required to participate in the full 12-month program, particularly if their detention was solely remand or their offending was limited in time, seriousness and frequency. A risk-based model matching dosage to need will be important to maximise funding impact. We understand that exposure to the criminal justice system from a young age is linked to poorer psychosocial outcomes.⁴ It is vital that the cohort is carefully considered based on individual needs, rehabilitation, and community safety.

Having seen the indicative performance measures for this program I am very supporting of outcome based program commissioning – recognising that each young person will respond differently to the intervention. A contract and program delivery that empowers the workforce to take the right steps to get the right outcome will be necessary, and will depend on workforce maturity.

I also note that some other organisations are seeking advice on the compellability or consent features of this program. It is my view that Queensland could improve its use of alternative sentencing options and that a mix of parole and alternative sentencing, as well as consent could enable three different pathways to this program. I am more hopeful, and therefore supportive, that time in post release support programs will be more transformative than detention. On this point the ability to commence the program within detention (form bonds,

⁴ Payne, J. L., & Roffey, N. (2020). Youth crime as a 'way of life'? Prevalence and criminal career correlates among a sample of juvenile detainees in Australia. *Australian & New Zealand Journal of Criminology*, 53(4), 460-476.
<https://doi.org/10.1177/0004865820960193>



build understanding and agree on a plan) is critical, and prevents the service delivery cliff between custody release and program initiation. This requires an adaptive custody model – with more NGO providers visiting more detained young people than currently. This needs to be featured into the youth detention model called for by the Child Death Review Board.

Specific Feedback: Intersection with the child protection system

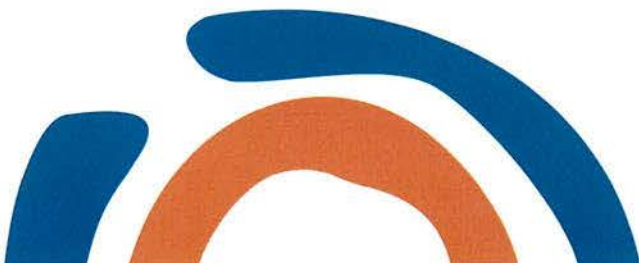
The QFCC knows that young people involved with the child protection system will be over-represented in the youth justice system and in the proposed initiatives. I believe that children in care should not be treated differently in terms of eligibility or engagement and should receive similar treatment, with the additional responsibility of the youth justice worker's roles reflecting the responsibility of parenting figures. There is a need for all government departments to recognise and accept their additional responsibility towards children in state care.

The success of the planned initiatives will depend heavily on cross-government coordination, especially for children and families involved in the child protection system, who often require additional support from sectors such as health, education, and housing. We believe that the non-government organisation (NGO) sector will play a pivotal role in providing intensive case management, and the more NGOs can leverage these cross-portfolio services, the better the outcomes will be for children, young people and families.

Establishing clear and transparent accountability will be important for ensuring the program's effectiveness and success. The QFCC welcomes the information already provided regarding the key performance indicators provided in the industry briefing materials and the reporting of the program performance. We seek to work more closely with the Department of Youth Justice and Victim Support and welcome continued dialogue regarding how we can best partner with you in reporting, performance analysis and evaluation.

I recognise this letter is lengthy. In summary while supporting the initiatives, I am suggesting that they would be strengthened if the following conditions were met:

1. All initiatives must prioritise genuine, sustained family engagement as central to service delivery. Particularly embed family engagement and active family participation in the program design.
2. Holistic and Relational Models should be preferenced as these address the underlying causes of youth offending rather than transactional justice.
3. Ensure communities, particularly culturally diverse and First Nations communities, have a meaningful voice in the design and implementation of youth justice programs. This is important to building trust in the system.
4. Ensure transparency about funding decisions, service locations, and target populations (particularly to enable portfolio rather than program evaluations)
5. Balance statewide service consistency through sole providers with locally tailored, innovated place-based solutions through a patchwork of providers.



6. Establish a Community of Practice to share knowledge, success stories, and professionalise the youth justice NGO workforce.
7. Invite QFCC to contribute to or partner in program assessment and monitoring.
8. Enable the regional Reset program to be an alternative to custodial detention or supervision orders, promoting a holistic rehabilitation approach.
9. Ensure providers can tailor the 12-month post-release case management approach and options to individual needs, focusing on education, employment, and community engagement.
10. Use a risk-based model for participant inclusion in the Staying on Track program, matching program intensity to individual circumstances.
11. Improve outcomes for the Staying on Track program by initiating support during detention to avoid service delivery gaps upon release. Note this will expand NGO involvement in detention facilities and will place burden on detention centre operations.
12. Enable the staying on track program to be entered either as parole, an alternative sentencing option, and/or via consent (i.e. three pathways to the program).
13. Ensure equitable treatment of children in state care and recognise the additional responsibilities for youth justice workforce that arise for this cohort.
14. Provide space for the Department to facilitate cross-government coordination for the children and workers in these programs, leveraging support from health, education, housing, and other sectors for children and families.
15. Establish clear accountability measures and performance reporting for all initiatives including their intercepts.
16. Partner with QFCC for program reporting, performance analysis, and evaluation.

If you have any queries in relation to this matter, please don't hesitate to contact me directly on [REDACTED] or via email at [REDACTED]

Yours sincerely

[REDACTED]

Luke Twyford
Principal Commissioner
Queensland Family and Child Commission

25 January 2025

