

Telephone:  
Reference:



Australian Institute of Family Studies

Via email:



Dear Refresh of the National Out-of-Home Care Standards Review,

Thank you for undertaking the important work of refreshing the National Out-of-Home Care Standards. The Queensland Family and Child Commission (QFCC) has a legislated responsibility to promote the safety, wellbeing and best interests of children and young people, and to improve the child protection system.<sup>1</sup> We understand the value of the perspectives and insights from individuals with lived and living experience of the care system, and advocate for young people to be involved in the decisions that impact their lives. The QFCC's involvement and dedication to improving out-of-home care for children in the care of the state have been, and will continue to be, shaped by ongoing engagement with young people in care, industry stakeholders, and the broader community, all of whom highlight deep concerns about the current system and how it fails to meet the needs of vulnerable children. The review of the National Standards must be approached with both urgency and a profound understanding of the realities of care.

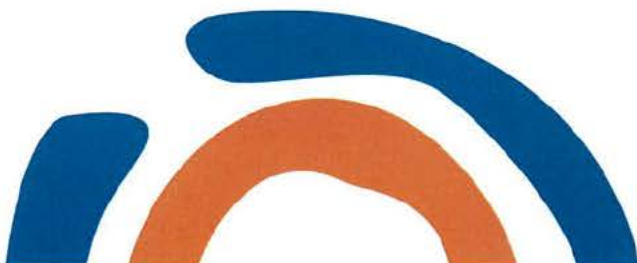
At the core of the out-of-home care system is an essential truth: when the state takes on the role of a child's guardian, it assumes the responsibilities of parenthood. Despite this, in practice there is a systemic failure to fulfill this role in a consistent, accountable, and child-centred way. The very essence of corporate parenting demands that the state offers more than just a "place" for children to stay: It must provide stability, love, guidance, opportunities, and a safe space for children to thrive, much as any loving parent would. Unfortunately, the evidence, particularly as captured in the annual reports from the Queensland Child Death Review Board, have painted a concerning picture of how government is failing in this role.

#### **The System as a Corporate Parent**

As the Principal Commissioner of the Queensland Family and Child Commission, and the Chair of the Child Death Review Board (the Board), I have reviewed the deaths of over 1,200 children over the past three years. Each death of a child known to the child protection system is a sobering reminder of the work yet to be done to address the known limitations of an overwhelmed system struggling to meet its core purpose: to protect children who are most at

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<sup>1</sup> Queensland Legislation (2014). *Family and Child Commission Act 2014*.  
<https://www.legislation.qld.gov.au/view/pdf/inforce/current/act-2014-027>



risk of harm and provide them with the opportunity to grow up to be safe, happy, healthy adults. The Board's recent findings describe how bureaucratic inertia and fragmented responsibility have led to inconsistencies in the delivery of care and support for children in care. The *Annual Report 2023-24* reflects a disturbing pattern where children in care experience instability in placements, unmet health needs, poor educational outcomes, and a lack of meaningful cultural connection.<sup>2</sup>

There is a need for a fundamental rethinking of corporate parenting. The state must understand its role as a child's parent and engage with the full weight of responsibility that this entails. Corporate parenting should not be a technical or administrative task but a responsibility to ensure that every child in care receives the nurturing, protection, and guidance they deserve. This requires more than regulatory compliance; it requires a reimagining of how children in Australia are best raised and how this can apply to a care system.

The child protection system must shift from being process-driven and bureaucratic to one that is deeply relational, child-centred, and focused on long-term, holistic outcomes for children. The Queensland experience shows that a lack of such an approach leads to children being caught in a cycle of uncertainty, which affects their mental, emotional, and physical wellbeing.<sup>3</sup>

I echo the Board's recommendation for "improved cross-government commitment to all children in care." The Queensland Government has been called upon to ensure all relevant departments - health, education, justice, housing, and others - align in their approach to supporting children in care. This recommendation, while vital for Queensland, must be considered at a federal level, where each portfolio lead publicly pledges their commitment to children in state care, ensuring that such commitments encompass the full spectrum of child welfare services, including employment, training, and opportunities for young people transitioning to adulthood.<sup>4</sup> A unified national approach, driven by transparency and accountability, would signal a united front from all levels of government to uphold the rights of children in care and improve their prospects. Too often, we are caught in discussions over the alignment of national frameworks, while children continue to experience substandard care.

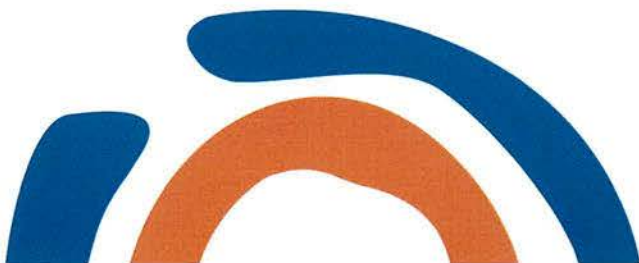
Drawing from the insights shared by children and young people with lived experience, as highlighted in the report *I Was Raised by a Checklist*, it is evident that the current system falls short in prioritising relational permanence, genuine care, and ongoing emotional support. Many young people in residential care have expressed feeling as though they are being raised as a risk to be managed, rather than a child seeking to be nurtured and loved. Their voices emphasise a critical need for care that goes beyond simply meeting basic safety and housing

<sup>2</sup> Child Death Review Board (2023). *Annual Report 2022-23*. <https://www.qfcc.qld.gov.au/sites/default/files/2024-08/Child%20Death%20Review%20Board%20Annual%20Report%202022-2023.pdf>

<sup>3</sup> Queensland Family and Child Commission (2024). *Growing Up in Queensland*.

[https://www.qfcc.qld.gov.au/sites/default/files/2024-02/9022\\_QFCC\\_Growing%20Up%20in%20Queensland.WCAG%20reading%20order\\_01%20COMPRESSED.pdf](https://www.qfcc.qld.gov.au/sites/default/files/2024-02/9022_QFCC_Growing%20Up%20in%20Queensland.WCAG%20reading%20order_01%20COMPRESSED.pdf)

<sup>4</sup> Child Death Review Board (2023). *Annual Report 2023-2024*. <https://www.qfcc.qld.gov.au/sites/default/files/2025-02/Child%20Death%20Review%20Board%20Annual%20Report%202023-24.pdf>



requirements. They require emotional support, trust, and, most importantly, people who genuinely care about them as individuals. The report underscores that meaningful relationships with staff are essential to positive outcomes, and without this, young people feel disconnected and overlooked.<sup>5</sup>

The QFCC has consistently stressed the importance of recognising children's right to a stable, loving, and supportive environment. In our report, *Rights, Voices, Stories*, we documented the experiences of young people involved in the Queensland child protection system, particularly those in residential care. Young people have made it clear that they do not just need a bed and food, but also positive and supportive relationships with trusted adults, consistency in care, opportunities to be heard, and a system that works actively to ensure their wellbeing.<sup>6</sup> Children in care want to be treated with respect, seen as individuals, and given the same opportunities as any other child in the community. As young people in our system have stated, it is vital that they are not seen through a "system lens" but through the lens of their humanity and their need for a loving, caring environment where they can thrive.

#### **Application of Existing Outcome and Wellbeing Frameworks to the National Standards**

I hold the strong view that the National Standards do not reflect the role of parenting sufficiently enough to bring honesty to governments role in raising thousands of children that it has removed into its care.

Outcomes frameworks and standards that take a step back and reflect on 'what a good parent would do' should be re-explored. The review and re-development of national standards must not disregard the very human experience of parenting. Many of the current out-of-home care frameworks, including those being proposed at the national level, fail to account for the lifelong nature of parenting. For children in care, the impact and role of the state is not temporary; it is lifelong. This must be reflected in the standards and services we provide. Children in care need to be raised to become healthy, loved, and safe adults, not simply removed from harm and placed in a system that treats them as a "project" to manage.

It is our strong opinion that historical methods of government service and program evaluation are not fit-for-purpose when considering the goal of residential care is to provide leadership in the raising of children. Ultimately many of the impacts of residential care service delivery eventuate in adulthood. Young people in residential care have strong and legitimate views on what good performance is, and looks like, in their lives. Past QFCC work, including the outcomes framework developed with young people living in care 'Rights voices stories - Identifying what matters to children and young people involved with the Queensland child protection system' provides a basis for considering system performance from the lens of the

<sup>5</sup> Queensland Family and Child Commission (2023). *I was raised by a checklist*.

<https://www.qfcc.qld.gov.au/sites/default/files/2023-10/1%20was%20raised%20by%20a%20checklist%20-%20QFCC%20Review%20of%20Residential%20Care.pdf>

<sup>6</sup> Queensland Family and Child Commission (2021). *Rights, Voices, Stories project report: Identifying what matters to children and young people involved with the Queensland child protection system*. [https://www.qfcc.qld.gov.au/sites/default/files/2022-06/Rights%20Voices%20Stories%20-%20Project%20Report\\_0.PDF](https://www.qfcc.qld.gov.au/sites/default/files/2022-06/Rights%20Voices%20Stories%20-%20Project%20Report_0.PDF)



people most impacted. The QFCC recommends that any performance framework or standards for out of home care include measures that apply at multiple levels across the care system including:

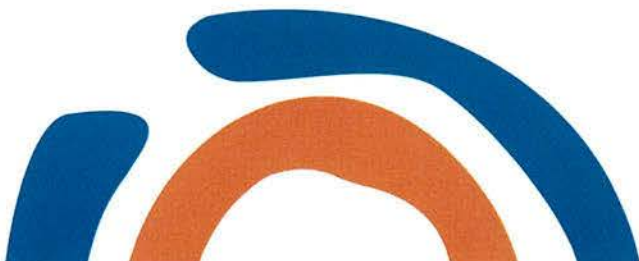
- 1) measures of the impact on an individual child;
- 2) measures relevant to individual houses;
- 3) measures relevant to individual providers (i.e. across their multiple houses);
- 4) regional measures (i.e. across multiple providers and houses in a geographic area); and
- 5) lifetime measures (i.e. outcome measures for young people after leaving residential care).

The performance framework must also include all life domains for young people in care – and explicitly meet the Rights of Children in Care set out in the Act - thus recognising the state's obligations to young people in care. The QFCC has held an internal workshop to elicit some of the key measures that might better define success in 30 residential care across the system. The measures outlined below and in the attached were developed in consultation with children currently in care.

The Australian Research Alliance for Children and Young People (ARACY) Nest Wellbeing Framework offers a valuable perspective for understanding the diverse needs of children and young people in care, highlighting their development across key domains such as valued, loved and safe, health, education, and identity and culture. The QFCC has adopted this framework as part of our scaffolding in our oversight of the current child protection system and in positioning the child in the context of family and community. Integrating this framework into national standards for out-of-home care however presents several challenges. It provides a holistic approach to community, household and child wellbeing, while also encompassing emotional, physical, and social dimensions of wellbeing can sometimes clash with the more immediate operational demands of child protection services.

Drawing on this framework the QFCC applied the life domains to the main actors in the residential care out of home care system and engaged children in thinking about their measurement. The resulting framework, attached to this paper, and embedding in our report "A System that Cares" was a call for a fundamental rethink of how we define success in out of home care.

The QFCC is also aware of the great risk of holding a system to set performance outcomes without emphasising that progress towards outcomes is the critical need. Poorly designed measures (such as a rate of school attendance for children) can be a negative incentive that means providers will turn some young people away from the service – thus isolating those most in need. A performance framework that is focussed on 'improvement' and 'impact' is essential. Balancing the need for trauma-informed care with the pressures of maintaining placement stability and meeting institutional requirements can complicate efforts to provide truly child-centred support. While the framework advocates for a community-based approach,



the complexities of cross-government cooperation and jurisdictional silos often obstruct the integration of services essential for a child's holistic development. As we move forward, it is critical that the national standards incorporate elements of the ARACY framework in a way that acknowledges these challenges, while ensuring the wellbeing of children and young people in care remains the foremost priority.

### **The purpose of National Standards**

The updated National Standards must serve the fundamental purpose of creating a consistent, child-centred approach that ensures every child and young person in out-of-home care receives the support they need to thrive. National Standards provide a clear, unified framework for delivering high-quality care that prioritises the rights, wellbeing, and long-term development of children, cross-jurisdictionally. These standards should be used as a tool for guiding practice, ensuring accountability, and improving outcomes for children by setting clear expectations for care providers, including specific practices and approaches to meet individual needs. The standards should aim to achieve better relational permanence, genuine care, emotional support, and the active involvement of children and young people in their own care.

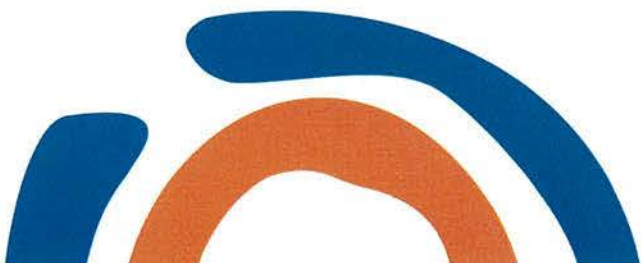
While the national standards must seek consistency, we caution against creating a framework that preferences national uniformity at the expense of the diverse needs of children across states and territories. It is essential that we do not stifle innovation or regional variation in how care is provided, as these differences are often driven by the unique needs of local populations. National standards can exist alongside jurisdictional flexibility, using common outcomes with bespoke, state determined-indicators to ensure that no child is left behind.

Each jurisdiction should not be required to wait for consensus on every data point before taking action. I have spent too much professional time in meetings focussed on achieving data consistency rather than quality care.

We must allow each state and territory to report in their own way, with clarity and a shared commitment to improving outcomes for children in care. This should be about a transparent dialogue with the community, parliamentary accountability for the raising of thousands of Australian children, and ongoing monitoring of what is actually happening for children in care.

Accountability mechanisms should be in place to ensure the standards are consistently met, including regular audits, independent reviews, and avenues for children and young people to provide feedback on their care experiences. Qualitative evidence of the care experience is incredibly easy to collect and measure, when you are not the Department responsible for the care.

There should be a strong emphasis on transparency, where young people are empowered to contribute to decisions that affect their lives. Currently, while the existing standards address many important areas, they often fall short in emphasising the need for relational permanence, emotional support, and genuine connections between care workers and children. Key areas that should be incorporated into the refreshed standards include more



comprehensive trauma-informed practices, a stronger focus on relationship-building, and clearer guidelines for creating a sense of "home" for children, not just providing housing.

The updated National Standards should also do more to explicitly embed the rights of children and young people as outlined in the United Nations Convention on the Rights of the Child. These rights must not only be referenced but should form the foundation of the standards, ensuring that children's voices are heard, respected, and integrated into every aspect of their care. Additionally, there should be specific reference to diverse population groups, recognising the distinct needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, infants, young children, and those identifying as part of the LGBTQI+ community. The standards should not only mention these groups but provide targeted approaches and practices to ensure that the unique challenges faced by these groups are adequately addressed.

Finally, the principles and values that should guide the National Standards must reflect a commitment to respect, dignity, equality, and inclusivity. The standards should prioritise relational connection, consistency, trust, and love, aiming to foster environments where children feel valued as individuals and supported in their journey towards achieving their full potential. These values must be underpinned by a shared commitment to human rights and the ongoing improvement of care for all children, ensuring that every young person in out-of-home care is empowered to succeed.

Our children deserve better than a system that merely checks boxes; they deserve a system that is truly committed to their long-term wellbeing and future success. It is time for a rethinking of corporate parenting that aligns with the full spectrum of child rights, offers transparency, and prioritises the lived experiences of children in care, from their entry into the system and throughout adulthood.

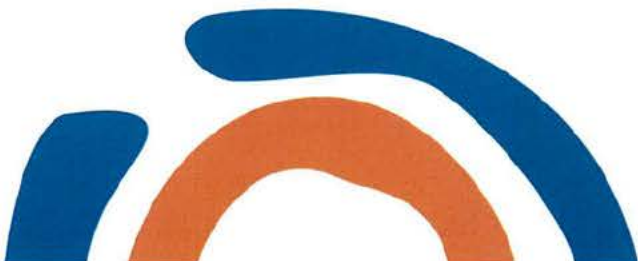
I look forward to continuing this conversation and supporting a child-centred approach to out-of-home care that ensures every child is heard, valued, and nurtured throughout their journey. If you have any queries in relation to this matter, please don't hesitate to contact me directly on [REDACTED] or via email at [REDACTED]

Yours sincerely

[REDACTED]

**Luke Twyford**  
Principal Commissioner  
Queensland Family and Child Commission

19 April 2025



Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Education and Employment</b>	<p>School attendance improves or remains steady</p> <p>NAPLAN/ Curriculum academic achievement increased</p> <p>Engagement in part-time work</p> <p>Development of CV and resume</p> <p>Possession of library card for resource access</p> <p>Engagement and attendance of excursions/ school trips</p> <p>Regularly read to by caregiver</p> <p>School movements decreased</p>	<p>Completion of homework is supported</p> <p>Adequate physical space for homework including desk and technology access</p> <p>Attendance at school excursions occurs</p> <p>Young person is regularly read to by caregiver</p> <p>School reports, school notes and parent teacher files are accessible in house</p> <p>Wifi and devices for learning are utilised</p>	<p>% of young people with access to tutors for schoolwork</p> <p>% of young people with access to, and engagement in, job preparedness training</p> <p>% of young people with active bank account and tax file number</p> <p>Rates of high school completion increased</p>	<p>Total school attendance rates for young people in residential care</p> <p>NAPLAN/ Curriculum academic achievement</p> <p>Care leavers who go on to employment/ higher education pathways</p> <p>Possession of library card</p> <p>% with active bank account</p> <p>% with Tax file number</p> <p>Residential care SDA rates</p> <p>High school completion rates</p>	<p>Increased rates of employment/ decreased rates of unemployment</p> <p>Decreased rates of incarceration</p> <p>Increased education level achieved</p> <p>% University or trade qualified</p>

Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Health and Wellbeing</b>	<p>Current NDIS plan for children with additional diagnosed needs</p> <p>Improved cooking skills and ability</p> <p>Young people complete chores</p> <p>Healthy BMI/ general health markers</p> <p>Decreased substance use and dependency</p> <p>Consistency of engagement with allocated health provider</p> <p>Child's views on their health needs are recorded and met</p>	<p>Rate of first Aid/ incidents in the home</p> <p>Access to hygiene products and personal care needs</p> <p>Access to physical activity equipment</p> <p>Expenditure against NDIS plan</p> <p>Measure of regular exercise/ access to exercise</p> <p>Measure of good nutrition</p> <p>House management has a response for 'sick days', when children are unable to attend school/ training/ activities</p> <p>Improved harm minimisation for substance use</p>	<p>Rate of first aid/ incidents in the home</p> <p>Sufficient supplies for hygiene/ personal care needs</p> <p>Expenditure against NDIS plan</p> <p>Measure of regular exercise/ access to physical activity</p> <p>Measure of good nutrition</p> <p>Expenditure on nutrition per child</p> <p>'Sick day' management plan for when children cannot attend programs</p> <p>% Usage of NDIS plans</p>	<p>% Young person has a Medicare card</p> <p>Completion of annual health checks – medical/ dental</p> <p>Rate and percentage of baseline assessments for children (health, dental, mental)</p> <p>Appropriate puberty and sexual health education provided</p> <p>Appropriate mental health treatment, including responsive treatment for self-harm and suicidality</p> <p>Expenditure on nutrition per child</p> <p>Rate and percentage of children diagnosed with a disability</p> <p>% Children have an NDIS plan</p>	<p>Decreased rates of unplanned young parenthood</p> <p>Decreased rates of substance misuse in adulthood</p>



Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Safety</b>	<p>Rate and duration of 'self-placements' decreased – young people remain at their approved placements longer, or are absent for less time</p> <p>Decreased involvement with Youth Justice (where involved); improved compliance and engagement</p> <p>Young person's views on safety are improved – self-assessment</p> <p>Decreased rate of police call-out</p>	<p>Completion of a safe neighbourhood plan</p> <p>Decreased rate of police call-out</p> <p>Rate and duration of 'self-placements' decreased</p> <p>Decreased staff turnover rates; improved staff retention</p> <p>Decreased staff assaults and expenditure on worker-compensation</p> <p>Decreased property damage – incidents and extent</p> <p>Increased visitation by OPG and Community Visitors</p> <p>Young people have a primary caregiver/advocate</p> <p>Youth Justice involvement decreased; compliance/engagement improved</p> <p>Bullying incidents decrease</p>	<p>Decreased rate of police call-out</p> <p>Rate and duration of 'self-placements' decreased</p> <p>Decreased staff turnover rates; improved staff retention</p> <p>Decreased staff assaults and expenditure on worker compensation</p> <p>Decreased property damage – incidents and extent</p> <p>Youth Justice involvement decreased; compliance/engagement improved</p> <p>Increased visitation by OPG and Community Visitors</p> <p>\$ property damage decreases</p> <p>Regular house inspections</p>	<p>Rate and duration of 'self-placements' decreased</p> <p>Decreased staff turnover rates; improved staff retention</p> <p>Decreased staff assaults and expenditure on worker compensation</p> <p>Decreased property damage – incidents and extent</p> <p>Decreased serious incidents/ injuries – rate and severity</p> <p>Increased visitation with CSO</p> <p>Regular house inspections</p> <p>Youth Justice involvement decreased; compliance/engagement improved</p> <p>Increased visitation by OPG and Community Visitors</p>	<p>Improved housing stability</p> <p>Decreased homelessness rates</p>

Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Participation and Connection</b>	<p>Young people take holidays away from placement</p> <p>Access to driving lessons and % obtain driver licence</p> <p>Young people have access to sports (and barrack for a team)</p> <p>Expenditure for extra-curriculars – art, hobby, literature, music, sports.</p> <p>Young people have sleepovers, excursions, camps</p> <p>Membership with CREATE</p> <p>Siblings placed together</p> <p>Connection to friends and peers</p>	<p>Young people take holidays</p> <p>Young people are able to attend sports/ other events</p> <p>'School friends' are included in activities</p> <p>Access to extra-curricular supplies – craft, sport, music, etc</p> <p>Sleepovers, excursions, camps occur</p> <p>Attendance to CREATE events</p> <p>Milestone events are celebrated – birthdays etc</p> <p>Young person feedback on 'there are fun things to do in my house'</p>	<p>Young people take holidays</p> <p>'fun' supplies are provided and accessed</p> <p>Rate of young person complaints</p>	<p>'My Life in Care' survey results</p> <p>Rates of sibling placements vs sibling groups separated between placements</p>	<p>Adult mental health and wellbeing increases</p>

Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Identity and Culture</b>	<p>Birthdays are celebrated</p> <p>Young people feel ownership of their room</p> <p>Young people have photos/ memories/ personal items</p> <p>Self-assessment of empowerment and autonomy</p> <p>Appropriate contact with family</p> <p>Siblings are placed together</p> <p>Self-assessment – freedom of identity, spirituality, culture, dreams and goals</p>	<p>Young people have photos/ memories/ personal items</p> <p>Engagement in community activity is regular</p> <p>Appropriate contact with family</p> <p>Siblings are placed together</p> <p>Young people can have friends visit and social visits (number and duration of visits)</p> <p>Young people involved in decision-making</p> <p>Young person’s goals are actively supported</p>	<p>Existence of cultural safety plan – expenditure on cultural events</p> <p>Existence of transition to independence planning</p> <p>Social visits occur</p> <p>Young people have feedback mechanisms</p> <p>Young person’s goals are actively supported</p> <p>Engagement in community activity</p>	<p>Young people have access to their birth certificate</p> <p>Young people have access to their files and child protection story</p> <p>Rates of sibling placements versus separation</p> <p>Rate of reunification</p> <p>Young people feel optimistic about their future</p> <p>Transition to adulthood plans – rate of completion</p>	<p>Enrolled to vote</p>

Performance Domain	Specific Child Metrics	Specific House Metrics	Specific Provider Metrics	System Metrics	Cohort Life Outcome Metrics
<b>Material basics</b>	<p>Adequate and appropriate clothing (value of wardrobe)</p> <p>Access to books</p> <p>Access to sporting gear/ exercise equipment</p> <p>Access to hobbies/ art supplies/ craft</p> <p>Young people have their own possessions / Ownership of furniture (value of assets)</p> <p>Young people have their own toys</p> <p>Young people have access to pocket money</p> <p>Young people have appropriate access to technology (e.g. phone, laptop)</p>	<p>Access to books</p> <p>Access to hobbies/ art supplies/ craft</p> <p>Young people have their own toys</p> <p>Adequate wifi connection and access</p> <p>Property and yard is maintained</p> <p>Expenditure for furnishings</p> <p>Access to technology and access to safe technology navigation education</p>	<p>Expenditure per child</p>	<p>Placement numbers per child (rate and duration)</p> <p>CSO turnover</p> <p>Expenditure per child</p> <p>Standards of Care investigations</p> <p>Rate of Young person complaints</p>	