

PeakCare submission regarding Safe and Supported Second Action Plans

PeakCare's Submission to the Federal Department of Social Services

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Introduction

PeakCare welcomes the opportunity to contribute to the development of the Second Action Plans under *Safe and Supported: the National Framework for Protecting Australia's Children 2021–2031* (Safe and Supported).

Safe and Supported provides an important nationally agreed framework for improving the safety and wellbeing of children and young people. Its strength lies in recognising that protecting children is a shared responsibility that extends beyond statutory child protection systems and requires coordinated action across governments, service systems and communities.

As Queensland's peak body for child and family services, PeakCare has a strong interest in both the national direction established through Safe and Supported and how this translates into practical change within Queensland. While responsibility for the delivery of child protection and many child and family services sits primarily with states and territories, the Australian Government has significant influence over the broader systems and policy settings that shape outcomes for children and families. National leadership can also support greater consistency between jurisdictions, strengthen the evidence base for reform and address issues that cannot be effectively resolved by individual jurisdictions acting alone.

The First Action Plans established important foundations for this work. The Second Action Plans provide an opportunity to build on these foundations and sharpen the focus on implementation. For PeakCare, the next phase of Safe and Supported should provide a clearer line of sight between national commitments, the actions governments will take, the investment required to deliver them and the outcomes experienced by children and families.

This submission therefore focuses on practical areas where national leadership and coordination can add value to jurisdictional reform. Across these areas, PeakCare's central message is that the Second Action Plans should be specific, measurable and accountable, with clearly identified responsibilities, implementation milestones and transparent reporting of progress and outcomes.

PeakCare's recommendations for reform are centred around the following key objectives:

- Shift investment upstream into prevention and early intervention.
- Strengthen national data, outcomes measurement and accountability, with a clearer focus on whether children and families are doing well.
- Improve the consistency, quality and accessibility of out-of-home care and associated supports, including through refreshed national standards.
- Build a skilled, sustainable and appropriately resourced child and family services workforce.
- Strengthen support for foster and kinship carers, including financial, workplace and practical supports.
- Ensure the rights, voices and diverse needs of children and young people are meaningfully reflected in implementation and evaluation.

Summary of PeakCare's recommendations on the Second Action Plans for Safe and Supported

The existing action areas under the First Action Plans remain well aligned with the sector's priorities. Rather than introducing new areas of focus our recommendations aim to align with the existing areas and identify opportunities to strengthen implementation.

Focus	Responsibility	Recommendations
Early supports	Australian Government	1 Establish nationally agreed measures for prevention and early intervention investment and outcomes, covering Commonwealth, state and territory activity. Embed child and family wellbeing considerations across relevant Commonwealth portfolios, including housing, health and mental health, disability, early childhood, education, employment and social services.
Data and research	Australian Government, in partnership with state and territory governments	2 Develop a nationally consistent approach to measuring the wellbeing and longer-term outcomes of children and young people, building on existing Australian wellbeing frameworks and complementing existing measures of child protection system activity. Establish a transparent accountability framework for the Second Action Plans, including identified responsibilities, implementation milestones, investment, outcome measures, annual public reporting and a mid-point review.
Out-of-home care	Australian Government, in partnership with state and territory governments	3 Publish refreshed National Standards for Out-of-Home Care, informed by the work undertaken by AIFS and SNAICC under the First Action Plan. Develop an implementation framework that translates the National Standards into measurable expectations for the experiences and outcomes of children and young people in care, supported by nationally consistent indicators and public reporting. Ensure implementation of the refreshed National Standards is supported by modelling of the workforce, service and funding requirements necessary to deliver the agreed standard of care. 4 Design and operationalise a child-held electronic credential, such as an E-Wallet, for every child entering out-of-home care, retained until at least age 21, including where they leave care before turning 18. Undertake an implementation planning study for a nationally consistent Health Access Card or equivalent mechanism for children and young people entering out-of-home care, retained until at least age 21, to support timely and continuous access to health services.

Focus	Responsibility	Recommendations	
Workforce	Australian Government	5	commission the development of, a comprehensive national workforce model for the child and family services sector which: • includes workforce supply and demand, qualifications and capability, remuneration, retention, career pathways, Aboriginal and Torres Strait Islander workforce development and regional and remote workforce requirements; and • defines the cost of delivering high-quality out-of-home care, taking account of relevant industrial award conditions, workforce requirements and National Standards for out-of-home care.
Carers	Australian Government	6	Implement the findings of the national Review of payments for foster, kinship and permanent carers, with a particular focus on Commonwealth taxation, income support and other financial settings that affect the financial security of carers. Review Commonwealth workplace settings affecting foster and kinship carers, including consideration of appropriate leave and flexible work entitlements when a child enters a carer's household; and Establish nationally consistent expectations for the support provided to foster and kinship carers, in partnership with states and territories, and aligned with refreshed National Standards for Out-of-Home Care and covering financial support, training, supervision, respite, therapeutic support, participation in decision-making and access to information and advocacy.
Rights, inclusion and participation	Australian Government	7	That annual public reporting on the Second Action Plans require governments to report on how children and young people with lived and living experience have been meaningfully involved in implementation and evaluation, including how their contributions have influenced decisions and actions.

About PeakCare

PeakCare is a not-for-profit peak body for child and family services in Queensland, providing an independent voice representing and promoting matters of interest to the non-government sector. Across Queensland, PeakCare represents small, medium, and large local, state-wide and national non-government organisations which provide prevention and early intervention, generic, targeted, and intensive family support to children, young people, families, and communities. Member organisations also provide child protection services, foster care, kinship care and residential care for children and young people who are at risk of entry to, or who are in the statutory child protection system and youth justice systems.

A large network of associate members and supporters also subscribe to PeakCare. This includes individuals with an interest in child protection, youth justice and related services, and who are supportive of PeakCare's policy platform around the rights and entitlements of children, young people and their families to safety, wellbeing, and equitable access to life opportunities.

PeakCare would like to thank members, sector stakeholders and partners who engaged with us in the process of developing this submission.

PeakCare's Submission

Early supports

Enabling upstream investment in prevention and early intervention

A strong evidence-base demonstrates the significant social and economic benefits of early intervention and prevention, particularly when supports are community-led and tailored to the needs of local communities.¹ Australia currently spends more than \$22 billion annually on late interventions for children and young people alone, including child protection, youth justice and acute health care. This represents an increase of over 40 percent since 2019, exceeding both inflation and population growth.²

Despite this, Australia's child and family services continue to direct substantial resources toward crisis responses, with families unable to access the support they need until concerns have escalated. Greater investment in prevention, early intervention and family support can reduce reliance on statutory child protection responses, prevent avoidable escalation and strengthen the wellbeing and capacity of children, families and communities.

Safe and Supported provides an important national framework for shifting this balance. Its First Action Plans recognised that child safety cannot be achieved through child protection systems alone and identified housing, health and mental health, disability, education, employment, family violence and other systems as central to addressing the social determinants of child safety and wellbeing. The *Safe and Supported Outcomes Framework* similarly identifies improved access to housing, health, education, disability, justice and economic security as necessary to reduce the social, emotional and economic risk factors associated with child abuse and neglect.³

The Australian Government's new approach to funding the Children and Families (CaFS) Program takes steps in the right direction to support prevention and early intervention. The program focuses on increasing flexibility for funding to be used to address local needs, measuring impact through outcomes

¹ Curtis, P., Glover, B., & O'Brien, A. (2023). The preventative state: Rebuilding our local, social and civic foundations.

² O'Connell, M. (2025). [The cost of late intervention 2024](#). The Front Project.

³ Australian Government, Department of Social Services (2023). [Safe and Supported: Outcomes Framework](#).

for children and families and redirecting investment towards Aboriginal and Torres Strait Islander community-controlled organisations.

The Second Action Plans should build on these foundations by creating practical mechanisms for the Commonwealth, states and territories to progressively shift investment upstream. This should include transparent measures of investment in prevention and early intervention, shared outcome measures, and stronger alignment across the Commonwealth portfolios that influence the conditions in which children and families live.

Recommendation 1:

That the Australian Government:

- establish nationally agreed measures for prevention and early intervention investment and outcomes, covering Commonwealth, state and territory activity; and
- embed child and family wellbeing considerations across relevant Commonwealth portfolios, including housing, health and mental health, disability, early childhood, education, employment and social services.

Data and Research

High-quality data and research are essential to understanding whether policies and services are improving the lives of children and families. Australia has well established national reporting on child protection, including information about notifications, investigations, substantiations, care and protection orders and out-of-home care (OOHC). While these measures provide important information about the operation of statutory systems, they provide a more limited picture of whether children and young people are doing well during and after their involvement with these systems.

The First Action Plans recognised the need to strengthen this national evidence base, including through consolidating national child protection reporting and identifying the data required to monitor the outcomes of Safe and Supported. The Second Action Plans Discussion Paper identifies more consistent, timely and useful data as an area requiring continued attention, alongside strengthening Aboriginal and Torres Strait Islander data sovereignty.

This provides an opportunity to shift the focus of national reporting from predominantly measuring system *activity* to understanding *outcomes* for children and families. Ultimately, the success of Safe and Supported should be understood not only through whether fewer children enter statutory systems, but through whether children are safe and well, have their material needs met, are connected to family, community and culture, participate in education and communities and have opportunities to thrive.

Australia does not need to start from scratch in defining these outcomes. ARACY's *Nest Wellbeing Framework* provides an established Australian framework for understanding child and youth wellbeing across six interconnected domains: healthy; valued, loved and safe; material basics; learning; participating; and positive sense of identity and culture.⁴ The Australian Government's *Measuring What Matters* national wellbeing framework similarly reflects a broader shift toward measuring national progress through wellbeing alongside traditional economic indicators.⁵ The priority should now be to build on these approaches and establish a stronger national focus on measuring the wellbeing of children and young people, including those experiencing vulnerability and contact with child and family service systems.

⁴ ARACY – Australian Research Alliance for Children and Youth (2024). [What's in the Nest?](#)

⁵ Australian Government, The Treasury (2024). [Measuring what matters](#).

Better information about children's outcomes must be accompanied by greater transparency about how governments are delivering commitments and the outcomes of those commitments. The Second Action Plans should provide a clearer line of sight between actions, implementation and outcomes. For each action, government should identify who is responsible for delivery, what will be delivered and by when, what investment is being made, and how progress will be measured. This should be supported by transparent annual public reporting, enabling governments, the sector, children, families and communities to understand whether implementation is progressing and whether this is translating into improved outcomes.

A mid-point review should provide an opportunity to assess progress before the conclusion of the Second Action Plans in 2031 and enable actions to be adjusted where evidence indicates they are not delivering the intended outcomes.

Recommendation 2:

That the Australian Government, in partnership with state and territory governments:

- develop a nationally consistent approach to measuring the wellbeing and longer-term outcomes of children and young people, building on existing Australian wellbeing frameworks and complementing existing measures of child protection system activity;
- establish a transparent accountability framework for the Second Action Plans, including identified responsibilities, implementation milestones, investment, outcome measures, annual public reporting and a mid-point review.

Out-of-Home Care

National standards for out-of-home care

Children and young people in OOHC should be able to expect a consistently high standard of care, regardless of where they live in Australia. Recognising significant differences in OOHC systems across jurisdictions, the *National Standards for Out-of-Home Care* (the National Standards) were introduced in 2011 to promote greater consistency in the quality of care and outcomes experienced by children and young people. The 13 standards cover critical aspects of children's experiences, including safety and stability, participation in decisions, health, education, connection to family and culture, support for carers and transition from care.

More than 15 years later, however, the National Standards have not been updated. Under the First Action Plans of Safe and Supported, the Australian Government commissioned AIFS and SNAICC to undertake a refresh of the Standards. This included a desktop review and consultation with young people with care experience, carers, Aboriginal and Torres Strait Islander organisations, service providers, governments and other stakeholders to inform recommendations for an updated National Standards.⁶

We understand that final recommendations from this work have not been publicly released and, at the time of this submission, refreshed National Standards have not been published. Completing this work and providing an update on the refreshed standards should be a priority under the Second Action Plans.

Importantly, refreshing the content of the National Standards alone will not be sufficient to create lasting change for children and families. The original Standards were intended not only to articulate

⁶ Australian Institute of Family Studies. [National Out-of-Home Care Standards Refresh](#).

aspirations for children in care, but to drive consistency, quality improvement and nationally comparable reporting of outcomes.⁷

The focus now should be to meaningfully implement, measure and reflect the National Standards in the design and resourcing of OOHC systems. Updated standards should establish clear expectations for the experiences and outcomes of children in care, be accompanied by nationally consistent indicators and reporting and provide sufficient flexibility for jurisdictions to determine how those expectations are implemented within their respective legislative and service systems.

Critically, implementation should consider what it costs to provide care that meets the agreed standards, including how national award agreements interact with the standards. Standards relating to safety, stability, health, education, cultural connection, participation and quality care have implications for workforce capability, staffing, supervision, training and the broader supports available to children and carers. Establishing national expectations without understanding the resources required to meet them risks creating a gap between the standard of care governments expect and the capacity of services to deliver it.

Recommendation 3:

That the Australian Government, in partnership with state and territory governments:

- publish refreshed National Standards for Out-of-Home Care, informed by the work undertaken by AIFS and SNAICC under the First Action Plan;
- develop an implementation framework that translates the National Standards into measurable expectations for the experiences and outcomes of children and young people in care, supported by nationally consistent indicators and public reporting; and
- ensure implementation of the refreshed National Standards is supported by modelling of the workforce, service and funding requirements necessary to deliver the agreed standard of care.

Access to services and entitlements

Children and young people in OOHC rely on health, education, disability, social security and other universal services, many of which are funded, administered or influenced by the Australian Government. The First Action Plan recognised this, committing governments to improving the lifetime outcomes of children and young people in and leaving OOHC through proactive access to universal services.

The Second Action Plans should now move to translate this commitment into practical mechanisms that make it easier for children and young people to receive the supports to which they are entitled.

Currently, access relies on individual carers, caseworkers or service providers identifying the Commonwealth and jurisdictional programs for which a child may be eligible and navigating separate application and administrative processes. Changes in placement, carer or location can further complicate continuity of access.

A more proactive approach would shift responsibility from children, young people and those caring for them to government systems. Relevant services and entitlements should be identified when a child enters care and, wherever possible, maintained as their circumstances change and as they transition from care into adulthood. PeakCare is a member of the National Foster Carer Sustainability Group and is supportive of Families Australia's call for the government to establish a national child-held credential which supports their access to benefits and a Health Access Card.

⁷ Australian Government, Department of Social Services. [Why develop National Standards?](#)

Recommendation 4:

That the Australian Government, in partnership with state and territory governments:

- design and operationalise a child-held electronic credential, such as an E-Wallet, for every child entering out-of-home care, retained until at least age 21, including where they leave care before turning 18; and
- undertake an implementation planning study for a nationally consistent Health Access Card or equivalent mechanism for children and young people entering out-of-home care, retained until at least age 21, to support timely and continuous access to health services.

Workforce

A skilled, supported and sustainable workforce is fundamental to improving outcomes for children and families. Yet Australia does not currently have a sufficiently comprehensive national picture of the child and family services workforce, its current capacity, or what will be required to meet future demand.

The First Action Plan recognised this gap, committing to scope the current and future needs of the child and family services workforce, including analysis of workforce demand, qualifications and the barriers and opportunities affecting workforce sustainability. It also identified recruitment and retention, workforce capability and access to training and support as necessary outcomes for a sustainable child and family service system.

Despite this, significant gaps remain in the national workforce evidence base. A comprehensive national approach needs to provide a clearer understanding of the size and composition of the workforce, vacancies and turnover, qualification levels, employment arrangements, projected workforce demand, regional and remote shortages and the representation of Aboriginal and Torres Strait Islander workers. It should also recognise that workforce pressures do not occur within individual service systems or jurisdictional boundaries. Child and family services compete for and share workers with disability, health, mental health, youth justice and other human services sectors.

The Australian Government is well placed to coordinate this work. Workforce supply, training pathways, industrial award conditions and migration are influenced by national policy settings, while workforce shortages in one jurisdiction or service system can have consequences across the broader human services workforce. A national approach should therefore move beyond identifying workforce shortages at a point in time and provide a basis for governments and the sector to understand future demand and plan investment accordingly.

Importantly, workforce planning should also consider the conditions required to retain and support skilled workers. Workforce sustainability is shaped not only by the number of workers available, but by remuneration, employment conditions, access to supervision and professional development, career pathways, organisational support and the capacity of services to meet the real cost of providing high-quality care.

This is particularly important in OOHC, where workforce requirements are directly influenced by regulatory and service standards, qualification expectations, staffing models and industrial award conditions. There is value in developing a stronger national understanding of the relationship between these requirements and the actual cost of delivering care. Without this, funding and commissioning arrangements risk being disconnected from the workforce inputs required to meet expected standards of care.

The Second Action Plans provide an opportunity to establish the national workforce evidence and planning required to support a skilled, sustainable and appropriately resourced child and family services workforce over the long term.

Recommendation 5:

That the Australian Government develop, or commission the development of, a comprehensive national workforce model for the child and family services sector which:

- includes workforce supply and demand, qualifications and capability, remuneration, retention, career pathways, Aboriginal and Torres Strait Islander workforce development and regional and remote workforce requirements; and
- defines the cost of delivering high-quality out-of-home care, taking account of relevant industrial award conditions, workforce requirements and National Standards for out-of-home care.

Carers

Foster and kinship carers provide children and young people who cannot safely live at home with stability and connection. Supporting and sustaining carers is therefore fundamental to improving the experiences and outcomes for children in OOHC.

The financial impact of caring is an important component of carer sustainability. Carers can face both the direct costs of meeting a child's needs and broader impacts on household income and employment, particularly where caring responsibilities require a carer to reduce their participation in paid work.

The *Review of payments for foster, kinship and permanent carers*, completed under the First Action Plan and published in August 2026, provides an important evidence base for reform.⁸ The review examined the adequacy, consistency and accessibility of payments and financial supports across Australia, including through economic analysis of the costs of caring for children in OOHC. It was commissioned in response to longstanding concerns that inadequate and inaccessible financial supports contribute to financial pressure on carer households and affect the recruitment and retention of family-based carers.

The Second Action Plans should include consideration not only of jurisdictional carer allowances, but of how Commonwealth taxation, social security, family assistance and other financial settings interact with the circumstances of foster and kinship carers.

Recommendation 6:

That the Australian Government:

- implement the findings of the national *Review of payments for foster, kinship and permanent carers*, with a particular focus on Commonwealth taxation, income support and other financial settings that affect the financial security of carers;
- review Commonwealth workplace settings affecting foster and kinship carers, including consideration of appropriate leave and flexible work entitlements when a child enters a carer's household; and
- in partnership with states and territories, establish nationally consistent expectations for the support provided to foster and kinship carers, aligned with refreshed National Standards for Out-of-Home Care and covering financial support, training, supervision, respite, therapeutic support, participation in decision-making and access to information and advocacy.

⁸ Australian Institute of Family Studies (2026). [*Review of payments for foster, kinship and permanent carers*](#).

Rights, inclusion and participation

Safe and Supported recognises that improving outcomes for children and families requires systems to respond to children's individual experiences, identities, rights and needs. This includes meaningfully involving children and young people in decisions about the systems that affect them, supporting Aboriginal and Torres Strait Islander children to remain connected to family, community, culture and Country and engaging with children with disability and developmental concerns to access the supports they need.

Listening to lived and living experience

The First Action Plan recognised the importance of embedding the voices of children and young people, families and people with lived experience in the design and implementation of Safe and Supported. This has supported increased attention to participation and the development of mechanisms for children and young people to contribute to national reform.

The Second Action Plans should build on this by shifting the focus from whether engagement occurred to whether participation was meaningful and influenced decisions. Children and young people should be able to see how their contributions have informed the development, implementation and evaluation of policies and programs that affect them.

This should form part of the broader accountability arrangements for the Second Action Plans. Annual reporting should require governments to demonstrate how children and young people with living and lived experience have participated in implementation, what governments heard through these processes, and how this influenced decisions and actions.

Recommendation 7:

That annual public reporting on the Second Action Plans require governments to report on how children and young people with lived and living experience have been meaningfully involved in implementation and evaluation, including how their contributions have influenced decisions and actions.

Aboriginal and Torres Strait Islander Child Placement Principle

Aboriginal and Torres Strait Islander children continue to be significantly overrepresented in child protection and OOHC. Achieving the objectives of Safe and Supported and Closing the Gap Target 12 requires sustained action to address the drivers of this overrepresentation and strengthen Aboriginal and Torres Strait Islander self-determination in decisions affecting children and families.

The Aboriginal and Torres Strait Islander Child Placement Principle provides an established framework for this work through its five elements of Prevention, Partnership, Placement, Participation and Connection. The focus of the Second Action Plans should continue to shift from recognition of the Principle toward consistent implementation of all five elements to the standard of active efforts.

As the Queensland peak body representing non-government organisations working with children and families, PeakCare recognises the leadership and expertise of Aboriginal and Torres Strait Islander community-controlled organisations in determining the reforms required to improve outcomes for Aboriginal and Torres Strait Islander children and families. PeakCare therefore supports the priorities identified by SNAICC and QATSICPP in relation to the Second Action Plans and defers to these organisations on the detailed actions required.

Disability and developmental support

In Queensland, children and young people in care experience disability at significantly higher rates than the general population. In 2024, 41% of children and young people in care were reported as having a diagnosed or suspected disability or neurodevelopmental disability.⁹ The Queensland Child Safety Commission of Inquiry also highlighted that disability and neurodevelopmental needs among children in care can remain unidentified or undiagnosed, leaving children without the supports they need. In some cases, these needs are not recognised until they have escalated significantly, including when a child or young person comes into contact with the youth justice system.¹⁰

Children and families involved with child protection can experience significant challenges navigating the interface between child protection, disability, health, early childhood and other service systems. For children in OOHC, these challenges can be compounded by changes in placement, uncertainty about responsibility for accessing and coordinating services, and differences between the eligibility requirements of individual systems.

The national disability support landscape is undergoing significant reform. Thriving Kids, the first phase of Foundational Supports, will support children aged 8 and under with developmental delay and/or autism with low to moderate support needs, with services commencing from October 2026 and full implementation expected by January 2028.¹¹ Children with permanent and significant disability, including children with high support needs, will continue to be supported through the NDIS.

These reforms create an important opportunity to improve access to early developmental support. They also make effective coordination between child protection, the NDIS, Thriving Kids, mainstream services and other Foundational Supports particularly important. The Australian Government has itself recognised that the reforms require the NDIS, Thriving Kids, state and territory governments to work together so families can move smoothly between systems where required.¹²

For children involved with child protection, eligibility for one particular service system should not determine whether developmental or disability related needs are met. This is particularly important for children in OOHC who have developmental concerns or additional support needs but do not meet NDIS eligibility requirements.

As Thriving Kids and broader Foundational Supports are implemented, the Second Action Plans should ensure the particular circumstances of children involved with child protection and OOHC are explicitly considered in implementation, monitoring and evaluation. This should include attention to access, continuity between service systems and whether children who are not eligible for the NDIS are receiving timely and appropriate support.

⁹ Queensland Department of Families, Seniors, Disability Services and Child Safety (2024). [Our Performance, Census of Children in Care](#).

¹⁰ Queensland Government, Child Protection Commission of Inquiry (2026). [From Pressure to Purpose](#).

¹¹ National Disability Insurance Scheme (2026). [Thriving Kids](#).

¹² Australian Government, Department of Health, Disability and Ageing (2026). [Engagement on Thriving Kids](#).

Conclusion

The value of Safe and Supported is in providing a shared national commitment to addressing the conditions that contribute to vulnerability, strengthening support for families and improving the experiences of children who come into contact with child protection and OOHC.

The Second Action Plans should be ambitious about what can be achieved through collective action over the next five years. PeakCare encourages governments to use this opportunity to focus effort and investment where it can make the greatest difference, while remaining accountable to the children, young people and families whose lives these reforms are intended to improve.

If you would like further information regarding any aspect of this submission, please contact:

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