

Inquiry into Elder Abuse in Queensland

Submission No:	89
Submitted by:	Caravan Parks Association of Queensland
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

CARAVAN PARKS ASSOCIATION OF QUEENSLAND'S **Inquiry into Elder Abuse**

Perspective of Queensland's Caravan & Residential Parks



EXECUTIVE SUMMARY

Submission to the Inquiry into Elder Abuse in Queensland

Submitted by Caravan Parks Association of Queensland (CPAQ)

Caravan and residential parks are home to thousands of older Queenslanders, many of whom are ageing in place without immediate family support. These communities provide essential housing for retirees and low-income individuals, offering affordability, safety, and social connection.

Queensland's tenancy legislation already includes strong resident protections. However, when residents experience cognitive decline, carer exploitation or isolation, park operators often become the only consistent presence, yet they lack authority, training, or access to support systems.

CPAQ submits that the solution is not additional regulation, but practical supports and system coordination. Operators should be enabled to raise concerns, and not be punished for trying to help.

Key Recommendations

- **Establish a centralised referral pathway** for operators to raise concerns about residents' wellbeing, where family or services are absent.
- Fund CPAQ to **deliver tailored, trauma-informed training and practical tools** to support early identification and lawful, compassionate response.
- **Improve access to aged care assessments and services** for residents in parks, with faster referrals and clearer eligibility guidance.
- **Introduce safeguards for carers and self-appointed advocates**, including identity checks and accountability standards.
- **Recognise park operators as trusted observers**, not service providers, and support their role in prevention.

With modest investment and better system design, Queensland can improve elder abuse responses and ensure older people in parks do not fall through the cracks.



QUEENSLAND CARAVAN & RESIDENTIAL PARK INDUSTRY

149,825

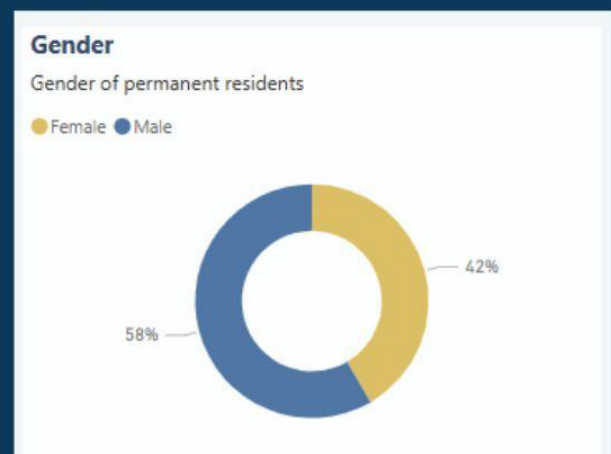
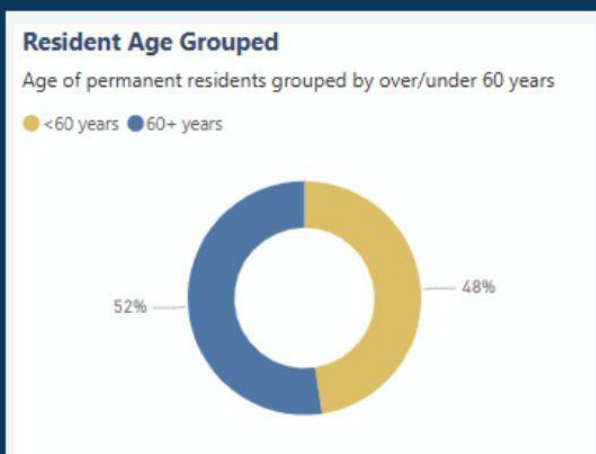
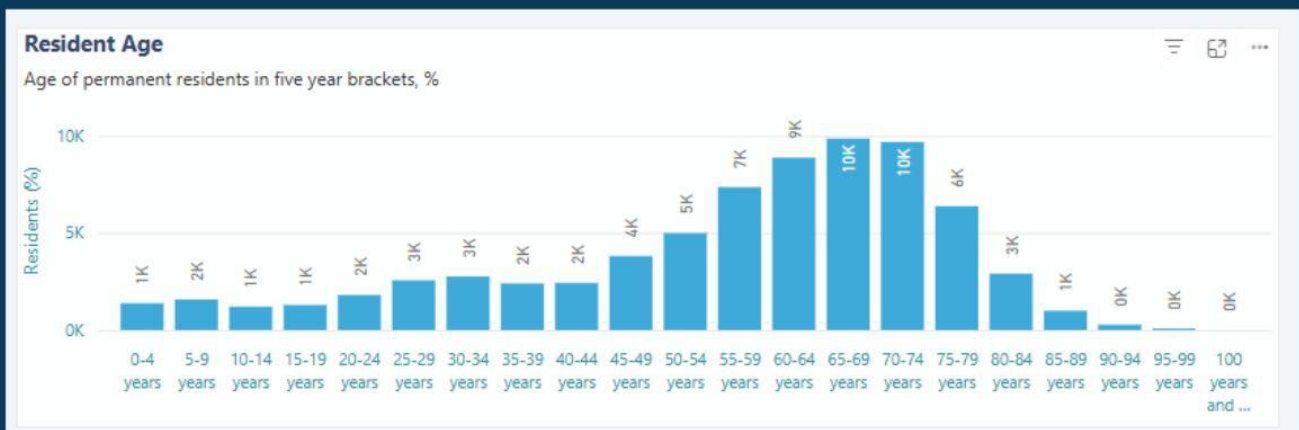
TOTAL PARK
RESIDENTS



51,290

RESIDENTS OVER
50 YEARS OF AGE

CARAVAN & RESIDENTIAL PARK RESIDENTS IN QLD



Introduction - Perspective of Caravan & Residential Parks

Caravan Parks Association of Queensland (CPAQ) welcomes the opportunity to contribute to the Inquiry into Elder Abuse in Queensland. As the peak industry body representing caravan and residential parks (parks) across the state, CPAQ brings a unique and grounded perspective to the Committee's consideration of the nature, extent, and system responses to elder abuse.

Established in 1966, CPAQ represents a diverse membership of long-standing, reputable parks, many of which are home to older Queenslanders living in long-term accommodation. These parks play an important role in the housing ecosystem, offering affordable and community-oriented housing options.

While residents come from a range of backgrounds, retirees and those on fixed incomes are among the most common cohorts. For many, these parks are not just a place to live, but a safe and supportive community.

CPAQ recognises the gravity of elder abuse and strongly supports the Government's efforts to examine how Queensland can better prevent, identify, and respond to all forms of harm and neglect affecting older people.

Our members are deeply committed to the safety and wellbeing of their residents, and many operators go above and beyond their legal obligations to provide support and connection to those in their communities who may be vulnerable.

It is critical that public discourse and policy development in this area are evidence-based and reflective of the reality on the ground.

While isolated instances of poor conduct by caravan and residential park operators (**park operators**) may exist, as they do in all sectors, these are the exception, not the rule. The vast majority of Queensland's parks are well-managed, compliant with current laws, and actively working to support resident wellbeing.

This submission outlines:

- the essential role parks play in accommodating and supporting older Queenslanders;
- the current legal safeguards in place that protect park residents from mistreatment;
- the challenges our members face in trying to access support for park residents who may be experiencing abuse, particularly where the alleged perpetrator is a third party; and
- practical recommendations to enhance the system response to elder abuse, including greater support, training, and referral pathways for park operators.

CPAQ's intent is to contribute constructively to this inquiry and ensure that the voice of this important residential sector, and the older Queenslanders who live within it, is accurately represented.

Overview of the Residential Landscape in Caravan Parks

The Role and Reach of Queensland's Caravan and Residential Parks

Parks in Queensland encompass a diverse mix of accommodation types, including short-term tourist stays, medium-term transitional housing, and long-stay residential arrangements.

These communities serve a broad demographic, with a significant proportion of long-stay residents being older Queenslanders. For many, these parks are not simply a housing option, but a place of community, stability, and safety.

Importantly, residents in these communities may fall under one of two legislative frameworks depending on their agreement and the nature of their tenure:

- the Manufactured Homes (Residential Parks) Act 2003 (**MHA**); or
- the Residential Tenancies and Rooming Accommodation Act 2008 (**RTRA**).

Both Acts establish clear rights and responsibilities for residents and park operators, and are designed to ensure fair treatment and secure housing arrangements for those who choose to make these parks their home.

It is critical to note that these frameworks have been extensively reviewed and amended in recent years, including multiple rounds of consultation with park residents, park operators, peak bodies and community stakeholders, as acknowledged by the Hon. Leeanne Enoch MP during the public hearing in Hervey Bay on 25 March 2025:

“You have reflected on those two overlapping pieces of legislation - the residential tenancies and rooming accommodation legislation and the manufactured homes and residential parks legislation. They are separate legislation but there are overlapping aspects. As you know, the manufactured homes and residential parks legislation was very heavily consulted on for many years.”¹

As a result of these robust legal protections and recent legislative reviews, Queensland’s framework is already well-equipped to prevent many forms of financial coercion, tenancy-related abuse, or exploitation by park operators.

The focus moving forward should be on strengthening enforcement, improving education and awareness, and ensuring that park operators and residents all have access to support when concerns about elder abuse arise. This work should be undertaken in close collaboration with peak bodies such as CPAQ, which are uniquely positioned to deliver tailored education and training, share industry best practice, and support continuous improvement across the sector.

Rather than introducing further regulation in an already heavily governed space, the opportunity lies in partnering with the sector to enhance early identification and intervention.

Queensland’s caravan and residential park operators can and should be viewed as valuable allies in this work, trusted local figures who are often the first to observe changes in resident wellbeing, and who are well-placed to contribute to a more responsive, trauma-informed system of support.

¹ Queensland Parliament, Education, Arts and Communities Committee – Public Hearing: Inquiry into Elder Abuse in Queensland, Hervey Bay, 25 March 2025, p. 3 (Hon. Leeanne Enoch MP).

As one operator aptly put it:

“A large percentage of elderly reside in parks as an alternative to Government Housing or supported accommodation. Many of these people do not have family connections or support, and struggle to obtain aged care assessments for their independent living, which negatively impacts the operations of the park and the quality of life for the resident.

Reporting by the park is neglected by police and as it is seen as a civil matter. Whilst there are regulating bodies for Child Protection, there is zero support for the elderly, who are just as vulnerable as our children. It’s a devastating way to finish your final years when neglect and abuse occur.”

This perspective highlights an urgent need to better recognise the role of park operators in safeguarding older Queenslanders and to equip them with access to referral pathways and regulatory support.

Economic and Social Contribution of Residential Land Lease Communities

Queensland’s parks, particularly those operating as Residential Land Lease Communities (**RLLC**) and Manufactured Home Estates (**MHE**), are not only critical to the state’s housing mix but also deliver significant economic and social benefits to their residents and surrounding communities.

According to the *Economic and Social Contribution of Manufactured Housing Estates in Australia* report, prepared by BDO EconSearch for the Caravan Industry Association of Australia, the MHE sector (which includes RLLCs) contributed approximately \$509 million to Queensland’s Gross State Product (GSP) in 2021–22.

This includes \$237 million in direct economic activity and an additional \$272 million in flow-on effects. The sector also supported over 2,370 full-time equivalent jobs in Queensland during the same period.²

² BDO EconSearch, *Economic and Social Contribution of Manufactured Housing Estates in Australia*, report for the Caravan Industry Association of Australia, 7 July 2023

Beyond economic contribution, the report highlights the profound social value these communities provide, particularly for older residents:

- Residents report higher personal wellbeing scores than the general Australian population, particularly in areas such as safety, community connection, and future security.
- A majority of residents feel safer, happier, and more connected after relocating into a MHE or RLLC.
- The report estimates \$17.1 million in avoided healthcare costs nationally due to improved mental and physical health outcomes for residents.³

These benefits reflect what CPAQ members observe daily:

that parks are more than just housing, they are thriving, community-oriented environments that offer affordability, social connection, and a sense of belonging for older Queenslanders.

Misconceptions vs. Reality: Parks and Elder Abuse

During public hearings for this Inquiry, some commentary has drawn attention to alleged instances of elder abuse occurring within parks, with references made to conduct by park operators.

While it is appropriate for the Committee to examine all environments where older Queenslanders reside, CPAQ urges the Committee to take an evidence-based approach that recognises the overwhelming majority of park operators are compliant, community-minded, and committed to resident wellbeing.

This submission does not seek to deny that elder abuse can occur in any setting. However, the current narrative risks unfairly characterising the sector without due regard for:

³ Ibid

- The significant social and economic value these communities provide;
- The robust legislative protections already in place;
- The absence of structured support pathways for park operators managing suspected abuse; and
- The frequency with which park operators are the first to observe and respond to situations of concern.

The following anonymised case studies, provided by CPAQ members, highlight the real-world complexities operators are navigating. They show that elder abuse within parks is far more likely to involve family members, informal carers, or unregulated “advocates” than it is to stem from operator misconduct. In many cases, operators are left without a clear course of action despite acting with diligence and compassion.

Operators as De Facto Responders

In many parks, park operators find themselves being called upon in moments of crisis, despite having no formal training or support for such responsibilities:

“We received an urgent call from the hospital one morning that they were not receiving a read from Gordon’s pacemaker... I found police had already arrived. He had passed away in his sleep. His wife, who had severe dementia, was still sleeping beside him.

After her removal, the so-called carer began coming back, removing items from the van. The car, which police had handed to me for safekeeping, disappeared. We later found out she’d taken it. When the Public Trustee got involved, they were asking us about jewellery and war medals that we’d never seen.”

(Operator case, Example 2)

This is one of several examples we have been informed of where park operators were forced to navigate legal uncertainty, grieving residents, estate management, and potential exploitation, all without clear protocols or referral pathways.

Informal Carers and Questionable Motives

Park operators frequently encounter situations where individuals claim to be carers but do not meet any formal or regulatory standards:

“One resident claimed someone was their ‘carer’ to get an extra access card. When I refused, they suddenly changed their story and claimed it was their car. Then they said it was for their carer again. The person never came during the day and had no documentation. It’s common - residents say they’re carers to get a pension because they live in the same park.”

(Operator case, Example 1)

In another case, an older resident with terminal cancer sought to bequest his onsite van to a much younger man who had moved in as a carer:

“We had neighbours reporting abuse. The carer was screaming at him. We contacted the GP making house calls to raise the concern. The van was sold and John vacated before passing away. His car had already been transferred into the carer’s name.”

(Operator case, Example 5)

These examples highlight the lack of a clear and enforceable definition of “carer” and the potential for financial and emotional exploitation under the guise of support.

Family Dynamics and Reluctant Disclosure

Elder abuse by adult children or family members is particularly difficult to manage when the victim does not wish to report:

“John was in his 70s with Parkinson’s. Neighbours said his children were screaming at him. We saw bruising, but he said it was from a fall. Eventually a social worker came and confirmed he was embarrassed and didn’t want to report their behaviour. I told her we’d prevent them from entering if it happened again.”

(Operator case, Example 3)

In these cases, the park operator or other residents are often the only witness or reporter, yet has no standing in formal processes, and is not recognised as a stakeholder in safeguarding measures.

The Danger of Self-Appointed ‘Advocates’

Several members have reported increasing issues with residents falsely claiming to be "elder abuse advocates":

“A resident became verbally abusive, claimed to be the ‘Elder Abuse Advocate’ for the park, and started breaching other residents and us - often forging signatures. He had no credentials or Blue Card and a criminal history. He’s told people he’s in charge of legal matters for the park.”

(Operator cases, Examples 4 and 6)

These actions not only undermine legitimate concerns about elder abuse, but also present serious risks to safety, privacy, and reputational integrity, especially when false allegations are made or staff are threatened.

The Reality Behind the Misconceptions

These case studies paint a very different picture from the one sometimes inferred during public commentary. They demonstrate that:

- Park operators are acting with diligence, compassion, and integrity in highly complex situations.
- Many instances of abuse involve external actors (family, informal carers, unauthorised “advocates”).
- The lack of formal authority, training or support systems leaves park operators exposed and unable to act with confidence.
- There is a growing need to support park operators as part of the safeguarding system, not paint them as the problem.

Challenges Faced by Park Operators

While Queensland’s legislative framework provides a strong foundation for protecting older residents in parks, park operators are often left at the frontline of complex social and welfare issues, without the tools, training, or authority to respond effectively. The following key challenges have been identified through direct consultation with CPAQ members.

No Clear Pathways to Report Concerns or Connect Residents with Support

Park operators are often the first to notice when something is not right. Sometimes it's a suspected case of elder abuse. More often, it's a resident whose ability to live independently is deteriorating, due to cognitive decline, chronic illness, or the slow effects of ageing, but who refuses or cannot access appropriate support.

Despite being well-placed to observe changes in behaviour, appearance, or social engagement, park operators have no clear avenue to raise concerns with the appropriate authorities or services. Their role is not formally recognised, and their observations, even when made with compassion and care, are frequently dismissed or unacknowledged.

Park operators consistently report the following challenges:

- Police may regard concerns as civil matters and decline to act.
- Aged care assessments are often delayed, with eligibility thresholds that do not reflect the practical realities of decline.
- Service providers may refuse support unless the resident consents, even where serious risk is evident.
- There is no centralised referral or triage mechanism that recognises park operators as trusted reporters.

“We’re not as social workers but we’re the only ones here every day. We see it first. And right now, there’s nowhere to go with that information.”

(CPAQ member park operator)

Park operators are left in an impossible position, responsible for running a business, ensuring resident safety, and managing serious welfare risks without authority or access to support systems. The absence of a practical reporting pathway for concerns around resident safety, vulnerability, or wellbeing is one of the most urgent gaps in Queensland's current elder support framework.

Unregulated 'Carers' and Informal Arrangements

Many residents are supported by family members, neighbours, or informal carers, some of whom exploit the situation for financial gain. Park operators report being unable to verify relationships or responsibilities due to:

- No requirement for identification or proof of carer status;
- No obligation for “carers” to meet screening requirements like police checks or Blue Cards;
- No agency responsible for monitoring carer conduct in informal arrangements.

This creates an environment where fraudulent or exploitative behaviour can go unchecked, particularly in cases involving vulnerable, isolated residents.

Emerging Risks from Self-Appointed 'Advocates'

A growing concern among CPAQ members is the rise of individuals who present themselves as community advocates, elder abuse advisors, or legal experts, without any credentials or authority. These individuals:

- Engage in intimidation of staff;
- Submit falsified documentation;
- Mislead other residents about their rights and obligations;
- Disrupt park operations under the guise of “protecting” residents.

Park operators currently have no mechanism to challenge these actions unless they amount to a breach of site rules and even then, enforcement is slow, inconsistent, or fraught with legal risk.

Difficulty Accessing Timely Aged Care Assessments and Support

Many residents require formal aged care assessments to access appropriate in-home services or residential aged care. Park operators report:

- Long delays in assessment scheduling;

- Unclear service boundaries and refusal of support from aged care providers due to task restrictions;
- Residents falling through the gaps because they are too “high-functioning” for aged care but too unwell for independent living.

This delays care, increases risk, and places pressure on park operators to manage situations well beyond their remit.

Lack of Access to Targeted Training and Tools for Early Response

Park operators are not seeking to become part of the formal health or aged care system, instead they are asking for support to identify and respond to issues appropriately when they arise.

Park operators frequently encounter residents experiencing cognitive decline, financial exploitation, social isolation, or carer neglect. These issues are often subtle and complex. Park staff are not clinicians or case managers yet are expected to make judgement calls on highly sensitive situations, without training, without resources, often without confidence, and without support.

To bridge this gap, CPAQ recommends that the Queensland Government fund CPAQ to develop and deliver tailored, trauma-informed training and tools that:

- Help park operators identify early signs of risk, including non-obvious indicators of abuse or deterioration;
- Equip park operators to respond in ways that are respectful, lawful, and trauma-informed;
- Clarify legal rights and limitations for park operators, so they can act with confidence and compassion;
- Provide templates and practical guides for documenting and escalating concerns appropriately.

As the peak body representing parks across Queensland, CPAQ is uniquely positioned to deliver this training in a way that is relevant, trusted, and operationally feasible for park businesses.

“We’re not looking for more rules — we’re looking for support. Give us the tools and guidance, and we’ll do the right thing.”

(CPAQ member park operator)

A small investment in industry-delivered training and resources could deliver significant outcomes in early intervention, risk reduction, and better outcomes for older Queenslanders living in parks.

Existing Safeguards and Recent Reviews

Queensland’s legislative framework provides significant protections for residents in parks, including older people. Residents in these communities may fall under one of two Acts depending on the nature of their tenure, the RTRA; or the MHA.

Both Acts contain clear provisions that support resident safety, security, and wellbeing, including protections against excessive rent increases, retaliatory action, eviction without cause, and unfair contract terms. They also include access to dispute resolution processes through the Residential Tenancies Authority (**RTA**) and Queensland Civil and Administrative Tribunal (**QCAT**), enabling residents to challenge decisions or raise concerns in a structured and supported way.

Strong and Evolving Legal Protections

Over the past five years, both Acts have been the subject of significant government consultation and reform processes. These have included formal reviews, public submissions, roundtables, and direct engagement with stakeholders — including resident groups, advocacy bodies, legal services, and industry.

The outcomes of these reviews have strengthened tenant and home owner protections. Key reforms have included:

- Enhanced transparency around rent increases;
- Clearer processes for entering and ending site agreements;
- Stronger protections against retaliatory action by park operators;

- Improved dispute resolution pathways;
- Ongoing reviews of site agreement terms and industry practices.

Clarifying the Regulatory Scope

The current legislative framework is fit for purpose in regulating housing-related matters, but does not extend into clinical care, case management, or welfare oversight.

As such, the regulatory expectations placed on park operators must remain appropriately aligned with their role as housing providers, not aged care or health professionals.

Where risks to older residents do emerge, such as cognitive decline, carer exploitation, or suspected abuse, the gap is not in tenancy law, but in the absence of an accessible, coordinated, and responsive welfare support system that operators can engage with when concerns arise.

Opportunities to Improve Responses to Elder Abuse

Queensland's parks play a vital role in housing older Queenslanders. However, park operators in these communities are often placed in challenging situations, observing signs of cognitive decline, carer misconduct, or vulnerability, without any formal mechanism to respond. Despite strong tenancy legislation, there remains a clear gap in the broader elder abuse response system.

CPAQ submits that the solution lies not in further regulation of already compliant park operators, but in strengthening the ecosystem around them, including better support pathways, training, and service coordination. The following opportunities reflect feedback from park operators and CPAQ's ongoing work with industry and government.

Establish a Practical, Centralised Referral Pathway

Park operators need a clear and accessible process for reporting concerns about a resident's wellbeing, including cognitive decline, neglect, or suspected abuse. This should:

- Be easy to use and available to non-clinicians;
- Acknowledge and respect the park operator's proximity to residents without requiring them to be aged care professionals;
- Trigger an appropriate response or welfare check from the relevant agency.

Park operators are not asking to become frontline responders. However, in the absence of appropriate family supports or formal service engagement, they are often the safeguard of last resort.

Where a resident has strong family involvement, a support coordinator, or regular care services, a park operator is unlikely to play any role beyond housing management.

But with so many older people living in parks who are estranged from family or have no family at all, it is critical that this vulnerable cohort has a basic safety net. Without a structured pathway to raise concerns, signs of serious risk may go unreported, not because they are unseen, but because there is nowhere to send them.

Fund CPAQ to Deliver Targeted, Trauma-Informed Training

Park operators are willing to support vulnerable residents but need the right tools and training to do so confidently and lawfully. CPAQ recommends that the Queensland Government fund the development and delivery of tailored training and practical tools that include:

- Early identification of elder abuse, neglect, or cognitive decline;
- Understanding legal obligations and limits of intervention;
- Practical scenarios, templates, and scripts for engaging with residents;
- Clear guidance on when and how to escalate concerns.

CPAQ is uniquely positioned to lead this work in partnership with government, ensuring delivery is trusted, relevant, and practical for park-based settings.

Improve Access to Aged Care Assessments and Services

Park operators report that many residents need aged care assessments or basic support services, but cannot access them in a timely or appropriate manner. Delays and service restrictions lead to decline, risk, and distress for both residents and park operators. CPAQ recommends:

- Faster, streamlined aged care assessment processes for residents in parks;
- Clearer guidance on eligibility and how to initiate support;
- More flexible service models for residents in non-traditional housing.

Strengthen Safeguards for Carers and Advocates

There is currently no framework for verifying informal carers or self-appointed “advocates” within parks or other settings. This enables potential abuse, impersonation, and misinformation. CPAQ recommends:

- Introduction of a standard for identifying legitimate carers, including minimum expectations (e.g. identity checks, police clearance, or referral from a registered service);
- Clarification of who may act as an advocate on behalf of another resident;
- Stronger penalties for fraudulent representation or abuse of vulnerable residents under false pretences.

Position Park Operators as Partners in Prevention — Not Perpetrators

While isolated incidents of misconduct may exist in any sector, the overwhelming majority of operators in Queensland are community-minded, compliant, and proactive in supporting resident wellbeing. Park operators are not seeking expanded responsibilities, but they do want:

- Recognition of their unique visibility into residents’ daily lives;
- Permission and pathways to report concerns;
- Confidence that concerns will be taken seriously and acted upon.

As one operator stated:

“We’re not asking to be social workers. We’re asking for a way to raise a red flag — and know that someone will follow it up.”

Conclusion: A Sector Willing to Work with Government

Queensland’s parks are part of the housing solution for older Australians. CPAQ stands ready to work with government to enhance protections for residents, support park operators in doing the right thing, and deliver practical, cost-effective tools that improve the system response to elder abuse, without adding unnecessary regulatory burden.

With the right supports in place, the sector can play a proactive, positive role in identifying and responding to elder abuse — and ensuring Queenslanders ageing in place can do so with safety, dignity, and respect.

About Us

About the Caravan Parks Association of Queensland (CPAQ)

This submission is made on behalf of the Caravan Parks Association of Queensland (CPAQ), the peak industry body representing caravan and residential park operators throughout Queensland. Established in 1966, CPAQ supports over 320 member parks throughout the state, encompassing a wide variety of businesses ranging from small, family-run parks to large, multi-site operators. CPAQ engages directly with park owners and managers, provides support, and maintains strong working relationships with state and local government. Our insights reflect the lived experiences of park operators housing thousands of older Queenslanders residing in MHE or on long-stay tenancies.

This submission was authorised by the CPAQ Chief Executive Officer and approved at the organisational level.

CPAQ welcomes the opportunity to discuss these recommendations further and remains committed to working in partnership with government to improve outcomes for older Queenslanders living in parks.