























22 April 2016

Research Director Health, Communities, Disability Services and Domestic and Family Violence Prevention Committee Parliament House George Street Brisbane QLD 4000

Children, Youth and Families

Churches of Christ Care 41 Brookfield Road Kenmore QLD 4069



Dear Director,

RE: Child Protection (Mandatory Reporting – Mason's Law) Amendment Bill 2016

Churches of Christ Care welcomes the opportunity to provide feedback on the proposed Child Protection (Mandatory Reporting - Mason's Law) Amendment Bill 2016. Churches of Christ Care is one of the leading not-for-profit providers of high quality, approved child care services in Queensland, operating 20 services for children aged 0-16 years. Our early childhood services focus on community need, and include centre-based care, home-based care and communitybased care, all with flexible support options.

Churches of Christ Care supports extending mandatory reporting to the early childhood education and care sector. We believe this will support a more consistent approach across states and territories and send the message that children's safety and wellbeing is taken seriously. However, we are concerned that it in its current form, the proposed amendments target mandatory reporting at too low a qualification level, such as Certificate III.

Churches of Christ Care recommends that mandatory reporting in the early education and care sector should only extend to approved providers under the Education and Care Services National Law. Approved providers undergo an application process, which includes screenings such as criminal history and bankruptcy, to obtain approvals to operate education and care services. Approved providers can be individuals or organisations, and if an approved provider is an organisation, individuals with management or control of services must undergo the same screening as individual operators.

Approved providers have existing responsibility for managing services, and the majority would have existing responsibility for quality compliance, including decision-making around responses to notifications. Given the level of responsibility that already sits with approved providers, mandatory reporting of suspected abuse sits naturally with this role.

Approved providers are responsible for creating workplaces where staff are supported to identify and report suspected harm, and are responsible for deciding if a case should be reported to















relevant authorities. Holding mandatory reporting responsibility at this level helps ensure that reporters have the high level of skill and training required to determine if observations made by child care assistants, students and volunteers are likely to indicate if a child is being exposed to significant harm. This higher level of skill and training would support notifications to be closer to the threshold levels that would warrant an intervention.

If you would like further information regarding this matter, please contact me on

Yours sincerely,

Jane Carter

General Manager, Children, Youth and Families