

## Queensland Child and Family Health Nurses Association (QCAFHNA)



Queensland Child  
and Family Health  
Nurses Association

7<sup>th</sup> April 2014

The Research Director  
Health and Community Services  
Parliament House  
George Street  
BRISBANE QLD 4000



Dear Director

On behalf of the committee of the Queensland Child and Family Health Nurses Association, we wish to register concerns regarding the some of the working changes being proposed to the Child Protection Reform Amendment Bill 2014.

Key working change in this proposed bill now states that for a mandatory report to be instigated that a health practitioner must determine that 'significant harm' or 'unacceptable risk' to a child has occurred.

*"Clause 5*

*Section 10(a)—omit,*

*insert— (a) has suffered significant harm, is suffering **significant harm**, or is at **unacceptable risk of suffering significant harm**; and...."*

This wording also appears to be contradicted later in the bill where the word 'significant' is now missing.

*(2) Section 22(1)—*

*omit, insert—*

*(1) This section applies if a person, acting honestly and reasonably—*

*(a) gives information to the chief executive under chapter 2, part 1AA; or*

*(b) otherwise notifies the chief executive or another public service employee employed in the department that the person suspects—*

*(i) a child has suffered harm, is suffering harm or is at risk of suffering harm; or*

While we understand that there will be a secondary pathway for those reports that don't meet the threshold, it is beyond the scope of practice for registered nurses, including those with additional qualifications in child and health, to make the determination regarding the degree of harm or risk.

Queensland Child and Family Health Nurses Association Inc  
PO Box 680  
Helensvale Qld 4212  
<http://www.qcafhna.org.au>


Policy makers and practitioners have been mandated to ensure the health and safety of our most valuable and vulnerable citizens: our children. The child welfare system's primary purpose is to keep children safe and to protect them from harm – not 'significant harm' or 'unacceptable risk'.

The inclusions of these qualifiers send the wrong message and the short and long term sequelae of not acting quickly is reprehensible.. Government agencies should step in immediately whenever a report is raised of a suspected abuse/neglect is happening, no matter how small the problem seems. We are failing our children if we wait for 'significant harm'.

We encourage the Queensland government to focus on implementing evidence-based programs which strengthen families. Encourage reporting of all suspected abuse/neglect so that early interventions can provide children at risk with meaningful and timely support.

Thank you for the opportunity to provide comment.

Yours sincerely



**Ms Janice Finlayson**  
President  
Queensland Child and Family Health Nurses Association (QCAFHNA)  
PO Box 680  
Helensvale Qld 4212