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6th February 2026

Mr Paul Stewart APM
Commissioner
Queensland Corrective Services
GPO Box 1054
Brisbane QLD 4001

By email: Enterprise-Strategy@Corrections.qld.gov.au

Dear Commissioner,

Re: Reducing Reoffending – A Strategy for Making Queensland Safer – Discussion Paper

Thank you for the opportunity to provide comments on the Queensland Corrective Services (**QCS**) Discussion Paper entitled 'Reducing Reoffending – A Strategy for Making Queensland Safer' (**Discussion Paper**). In this submission, we have outlined our feedback on each of the four strategies proposed in the Discussion Paper.

Preliminary consideration: Our background to comment

The Aboriginal and Torres Strait Islander Legal Service (Qld) Limited (ATSILS), is a community-based public benevolent organisation, established to provide professional and culturally competent legal services for Aboriginal and Torres Strait Islander peoples across Queensland. The founding organisation was established in 1973. We now have 25 offices strategically located across the State. Our Vision is to be the leader of innovative and professional legal services. Our Mission is to deliver quality legal assistance services, community legal education, and early intervention and prevention initiatives which uphold and advance the legal and human rights of Aboriginal and Torres Strait Islander peoples.

ATSILS provides legal services to Aboriginal and Torres Strait Islander peoples throughout Queensland. Whilst our primary role is to provide criminal, civil and family law representation, we are also funded by the Commonwealth to perform a State-wide role in the key areas of Community Legal Education, and Early Intervention and Prevention initiatives (which include related law reform activities and monitoring Indigenous Australian deaths in custody). Our submission is informed by over five decades of legal practise at the coalface of the justice arena and we, therefore, believe we are well placed to provide meaningful comment, not from a theoretical or purely academic perspective, but rather from a platform based upon actual experiences.

Comments on Consultation

Below, we have outlined our comments in relation to each of the four proposed strategic directions from the Discussion Paper.

1. *Targeted responses: Deliver evidence-based assessment, planning and rehabilitation programs that target offending behaviour and reduce the number of victims of crime.*
    - *Improve access to evidence-informed assessments that identify risks, needs, and rehabilitation priorities.*
    - *Strengthen individual rehabilitation planning so interventions are appropriately delivered.*
    - *Expand access to evidence-informed rehabilitation programs based on risk and need.*

(a) Strategic Direction 1 refers to 'assessments' and 'programs. It is unclear as to whether these terms relate to initial assessments—such as pre-sentence reports and community-based programs—or whether they refer exclusively to assessments and programs delivered during a person's custodial sentence. Regardless of the intended scope, we request further detail on how the government proposes to measure the quality and integrity of 'evidence-based assessment.

(b) We ask whether the government intends to include, as part of its assessment processes, the identification of barriers that might prevent prisoners from engaging in rehabilitation programs. Such barriers might include literacy levels, language needs, disability and other learning differences. This is particularly important given the increasing number of adults being diagnosed with neurodivergence.

(c) We would like to understand what transitional arrangements will be implemented while the proposed improvements are rolled out. For example, we understand that Borallon Training and Correctional Centre is currently not offering programs due to a potential closure. We are concerned about the impact on prisoners if similar disruptions occur or if there are delays in implementing the improvements.

(d) We would like to understand how the government intends to embed culturally appropriate assessment frameworks, particularly those relevant to Aboriginal and Torres Strait Islander peoples. Ensuring that cultural considerations are meaningfully integrated into assessment and rehabilitation processes is essential.

(e) We note the need for clarity regarding what constitutes an 'evidence-informed' rehabilitation program. Is the intention to adopt an approach similar to the domestic and family violence context, where courts may only make an intervention order if the respondent is enrolled in a behavioural change program that is formally registered as a court-approved course? If so, it would be helpful to understand how programs will be accredited and distinguished from other community-based offerings.

(f) We emphasise that an over-reliance on programs, without addressing underlying social determinants such as housing instability, health needs, and trauma, might limit the effectiveness of the strategy. Additionally, without significant investment in recruiting and retaining appropriately qualified professionals (both assessors and program providers) timely access to assessments and programs might be compromised.

2. *Intensive rehabilitation: Increase meaningful, structured activity that builds safe, productive and pro-social behaviour to support community safety*
   - *Increase meaningful and productive daily activities that reinforce routine, responsibility and positive behaviour.*
   - *Provide opportunities to build practical skills and capabilities that support safe, lawful and productive participation in the community.*
   - *Strengthen vocational and personal development pathways that support long-term desistance from offending.*

(a) Strategy 2 refers to 'structured activities'. We seek clarification on: whether the proposed 'structured activities' will all be education-based; and whether they will also incorporate trauma-informed and culturally informed approaches.

(b) With respect to dot point 2 and, particularly, the reference to 'provide opportunities to build practical skills and capabilities', we ask whether the government has considered integrating industry partnerships. Aligning in-custody skill development with real labour-market needs would significantly enhance post-release employment prospects.

(c) We request further detail on how the government intends to measure the success under Strategy 2. What evaluation metrics are intended to be used—for example, program completion rates, skill accreditation, hours of meaningful activity per person, certificates issued, letters of support or other indicators of engagement and achievement?

(d) We are concerned that inequitable access to programs across correctional centres, particularly smaller or remote facilities, is likely to persist, given the significant variation in operational practices between centres. What strategies are proposed to address this? Will programs be centrally monitored or delivered by QCS, or will delivery be outsourced to local service providers?

(e) We wish to highlight the ongoing impact of staff shortages on the consistent delivery of structured activities. By way of an example, at Townsville Correctional Centre, our practitioners report that it is a regular occurrence that, even when education sessions/courses/programs are scheduled months in advance in coordination with QCS, they are frequently cancelled at short notice due to lockdowns arising from insufficient staffing. Additionally, it is common for our practitioners to find out about the cancellation due to insufficient staff after they have attended the facility and have passed through security, on the day that delivery was scheduled to occur. Inconsistency of delivery due to staff shortages significantly undermines program continuity and participant engagement.

(f) We seek clarification on how the government intends to address the current lengthy waitlists for programs, as well as the limited availability of certain programs at specific centres. These delays can have substantial consequences for sentence progression and rehabilitation outcomes.

(g) We also request information on how continuity of programs will be supported upon release. Will individuals be able to commence programs in custody and complete them in the community? Will there be follow-up interventions to ensure sustained engagement and improved reintegration outcomes?

3. <u>Release ready: Support safe, structured reintegration to reduce reoffending</u>

- *Strengthen evidence-based re-entry and reintegration services through partnerships to equip and prepare individuals.*
- *Improve release readiness by building transferable skills and supporting pathways to safe, lawful and productive participation in the community after release.*
- *Strengthen connection to family, culture and community, particularly for Aboriginal and Torres Strait Islander peoples, where it supports reduced reoffending.*

(a) We are interested to know whether, and how, the government plans on expanding partnerships with housing providers, health and mental health services, Aboriginal and Torres Strait Islander community-controlled organisations and vocational education providers. Reintegration outcomes are heavily dependent on the availability and responsiveness of community services. Gaps or delays in housing, mental health support, or income security risk undermining the broader goals of supporting people to return to the community safely and reducing reoffending.

(b) We request information on whether the government intends to undertake internal and/or external consultation in designing continuity-of-care frameworks. There is concern that outsourcing this work to private entities without practical experience or operational knowledge of the corrective services environment may result in frameworks that are not fit for purpose.

(c) We ask whether the government would consider implementing a structured 'prisoner throughcare'-type model with dedicated case managers or officers to support individuals from custody through to community reintegration. Such a model could provide consistency, accountability, and improved coordination across service systems. ATSILS currently provides such a service but is significantly under-resourced (given the prisoner population numbers).

(d) High-risk cohorts, including individuals with cognitive impairment, disability, serious mental illness, and young people transitioning from youth detention—may require specialised transition units or tailored support structures. We seek clarification on how the government intends to design and resource these differentiated structures/models.

(e) We request detail on how Strategy 3 will interface with the National Disability Insurance Scheme (**NDIS**). Effective reintegration for eligible individuals requires early engagement with support coordinators, the establishment of rapport with

service providers prior to release and clarity regarding how and where support will be accessed in the community.

(f) Transitional housing remains one of the most significant barriers to release. Many individuals struggle to secure accommodation while in custody, and homelessness is a common factor contributing to return to custody. We ask how the strategy (or the government more broadly) will address the ongoing chronic shortage of suitable housing options.

(g) Boarding houses are often high-risk environments for people transitioning from custody, particularly those with substance-use histories. Co-location with peers who may be engaged in offending behaviour can undermine rehabilitation efforts. There is a need for safer, more appropriate alternatives for individuals who cannot secure a private address.

(h) We highlight the complexity and length of the current reintegration process. In some centres, individuals must first join a waitlist for a course with Men's Reintegration Service (**MRS**, formerly CREST) before accessing re-entry services. They must then apply for boarding houses and/or rehabilitation programs, await acceptance, undergo accommodation suitability assessments by Community Corrections, and then wait for Parole Board consideration (which often takes time). In the best-case scenario, parole is granted, pending a bed. The individual must then wait for a bed to become available, for this to be communicated from the accommodation provider to Sentence Management and on to the Parole Board (representing multiple layers of administration). They must then wait for the Parole Board give them a release date. The entire process is unduly onerous. Furthermore, in some locations, such as Wide Bay, there are no accommodation options that do not have a 12 month plus wait list, effectively further preventing timely release. We ask how the government intends to streamline and improve this process.

(i) We ask whether the government intends to partner with local, community-led programs, including those delivered by Aboriginal and Torres Strait Islander organisations and provide secure, long-term funding for the same. Too often, programs that demonstrate positive outcomes lose funding shortly thereafter, disrupting continuity of great work and results.

4. *Capable workforce: A skilled and supported workforce delivering safe, effective rehabilitation and contributing to community safety and fewer victims of crime.*
   - *Foster a positive environment and a culture that supports rehabilitation.*
   - *Strengthen workforce capability by supporting clear operational guidance and a safe environment for effective rehabilitation.*
   - *Reinforce that reducing reoffending is a shared responsibility and every individual at QCS has a role to play.*

(a) We recommend that the government develop targeted workforce-development initiatives to support the successful implementation of Strategy 4. In particular, there is a need for:

(i) comprehensive cultural capability training, especially in relation to working effectively with Aboriginal and Torres Strait Islander peoples;

(ii) trauma-informed practice training; and

(iii) clearly articulated case-management competency frameworks.

These initiatives would help ensure that staff are equipped with the skills required to deliver high-quality, person-centred rehabilitation and reintegration support.

(b) We also encourage the government to establish robust mechanisms to support staff wellbeing and prevent burnout. Sustained workforce capacity is essential to achieving the strategy's objectives and staff require appropriate structures, supervision, and organisational support to maintain their wellbeing.

(c) We note that the cultural and operational change required under this strategy will demand long-term commitment. Achieving meaningful and lasting reform will require consistency across election cycles. There is a risk of 'initiative fatigue' if the strategy is disrupted or deprioritised due to changes in government, particularly given its 10-year horizon.

(d) We reiterate concerns raised earlier in this submission regarding operational pressures, such as staffing shortages and lockdowns, which can significantly reduce opportunities for rehabilitation delivery. These pressures must be addressed if the strategy is to be effective.

(e) In particular, we highlight the need to increase the number of Community Liaison Officers (**CLOs**), including within low-security centres. For example, Numinbah Correctional Centre currently has no CLO, and Palen Creek receives only intermittent visits from Borallon-based CLOs. This is particularly important given the significant overrepresentation of Aboriginal and Torres Strait Islander

peoples in custody and the critical role that CLOs play in ensuring cultural safety within the correctional context in numerous ways, including, but not limited to: helping to bridge cultural and communication gaps between prisoners and corrective staff; reducing miscommunications that could result in negative outcomes for the prisoner; assisting with access to healthcare (preferably culturally appropriate healthcare); and protecting rights and procedural fairness of the prisoner.

We thank you for the opportunity to provide feedback on the Discussion Paper.

Yours faithfully,

Shane Duffy
Chief Executive Officer