

## Background

The Queensland Government has asked the Child Death Review Board (the Board) to review system responses to child sexual abuse in Queensland, using the offending of a convicted perpetrator as a case study. The review will make recommendations for any improvements needed to the laws, policies, procedures and practices across the early childhood education and care, police and Blue Card systems. The Board is conducting the review under section 29I of the *Queensland Family and Child Commission Act 2014* (the Act). The terms of reference for the review can be found on our [website](#).

## Progress overview

Over the last two months, the Board has made significant progress in its review of systemic responses to child sexual abuse.

- **Consultation with impacted people** – The review team has engaged with people impacted by the offending and supported them to make submissions to the review. This has ensured the voices of victim-survivors, their families and former colleagues of the offender are central to our understanding of this case and the issues under the review's terms of reference. We have received written submissions and conducted interviews with six impacted parties. These conversations have informed the Board's understanding of the individual and systemic failures of this case and ensured that lived experience remains at the heart of our analysis. Early themes from this engagement are discussed in further detail below.
- **Information-gathering** – The Board has issued 14 information requests and received more than 17,000 pages of material and 36 hours of video footage and audio recordings from investigations conducted after the offending was detected. Since March, eight new information requests have been issued to relevant agencies under the Board's statutory powers (s29P of the Act). The material received has been subject to detailed review. This process has helped identify areas where further clarification or supplementary information is needed, and follow-up requests are being prepared to close these gaps.
- **Expert Roundtable** – The Board convened its first Expert Roundtable to examine the timeline of offending and share preliminary insights. The themes from the discussion are outlined below. The roundtable ensures the Board's review seeks and incorporates the advice of experts, in line with the terms of reference. The roundtable was attended by 28 subject matter experts in child safeguarding, victim engagement, policing, and child sexual exploitation and law. The roundtable enabled discussion around evidence, emerging risks and best-practice safeguarding. It was a critical step in testing our lines of inquiry and ensuring the review remains rigorous, trauma-aware and informed by best practice.
- **Research** – Final reports have been received from four leading Australian academic institutions commissioned to complete research on international best-practice in preventing child sexual abuse, detecting potential perpetrators and children at risk, and responding effectively to a report of abuse. This research provides contemporary and evidence-based insights that will inform the Board's recommendations.
- **Legislative analysis** – The review team has finalised detailed legislative analysis, charting the evolution of Australian and Queensland laws governing sexual offending against children, the regulation of early childhood education and care, and the working with children checks (Blue Card) system. This analysis

traces relevant reforms during and after the perpetrator's offending was detected, offering critical context for assessing systemic strengths and gaps over time.

- **Cross-jurisdictional consultation** – The review team has engaged with regulators, ombudsmen, and children's commissioners in other Australian jurisdictions to gain national and cross-jurisdictional perspectives. This has focused on preventing, identifying and responding to child sexual abuse, including the design, implementation and evaluation of reportable conduct schemes. This is helping the Board to understand different models of oversight and the lessons they offer Queensland.
- **Timeline of offending** – The review's work is underpinned by the development of a detailed chronology of the offender's actions. It draws on court and public records and information accessed under our statutory powers to map the offender's employment history, residential locations, and contact with institutions. The timeline will enable the Board to identify missed opportunities for intervention and the systemic factors that contributed to the offender's ability to avoid detection. The review team will continue building the timeline for inclusion in the final report.
- **Call for public submissions** – The review team has called for public submissions on improvements needed in policies and practices in the early childhood education and care, police and Blue Card systems to better protect children from sexual abuse. This invites submissions from the public, specifically from community organisations with expertise in child safeguarding. Submitters are invited to reflect on the details of this progress report and provide further insights, which will inform the final findings and recommendations.

## Key matters to date

### *Early childhood education and care system*

Early childhood education and care (ECEC) services include family day care, long day care services, kindergarten and outside school hours care (OSHC). As of 31 March 2025, there were 3,355 approved ECEC services in Queensland.<sup>1</sup>

In 2024, a total of 52,377 staff were working across services in Queensland.<sup>2</sup> Over 40,000 worked in long day care, limited-hours care and occasional care. The majority of the ECEC workforce was female, at 92.1 per cent. Most ECEC services are approved and regulated under the National Quality Framework (NQF). The NQF provides a national approach to the regulation, assessment and quality improvement of ECEC services across Australia, including in Queensland.

Ensuring the safety, health and wellbeing of children attending ECEC services is one of the objectives of the NQF.<sup>3</sup> The Early Childhood Regulatory Authority (ECRA) is responsible for regulating ECEC services in Queensland. The ECRA is responsible for monitoring and enforcing compliance, investigating complaints, and assessing approved early childhood education and care services to determine service ratings.<sup>4</sup>

During 2023–2024 the top three breaches of the National Law identified by ECRA in Queensland were:

- offence to inadequately supervise children (620)
- offence relating to the protection of children from harm and hazards (478)
- offence to fail to notify certain information to the Regulatory Authority (247).<sup>5</sup>

### *What has the review heard so far?*

- The prioritisation of an organisation's reputation, a fear of defamation and legal risks to organisations and individuals may act as a deterrent to raising or sharing concerns about a person, particularly where complaints have not been substantiated.
- Complaint processes can be unclear, including within individual centres and in the referral of complaints to the ECRA. This is particularly problematic where the person subject to a complaint holds a senior role within a centre or may otherwise be involved in the investigation of a complaint.
- The workforce is large and highly casualised. This makes it difficult to attract and retain qualified staff and to meet minimum staffing requirements. Workforce pressures may also impact the quality of recruitment processes, including the robustness of referee checks.
- ECEC services are delivered in a complex and crowded regulatory landscape, with child safeguarding practices being one of many areas of focus. This can impact the type of training provided to staff, including education to effectively identify and respond to child sexual abuse within ECEC services.
- Unclear information sharing processes and a fear of privacy breaches may also create an environment where early indicators of potential harm are minimised. This impacts the system's capacity to detect child sexual abuse, including by identifying patterns over time and across services.

### *The Blue Card system*

Working with Children Checks (WWCCs) are undertaken to ensure people meet the eligibility requirements needed to participate in child-related work. This results in a working with children clearance. In Queensland, this is referred to as a Blue Card. The Blue Card system is administered by the Department of Justice and includes three key components:

- **Employment screening:** a point-in-time employment screening process, which issues either a Working with Children Clearance or a negative notice barring the applicant from child-related work.
- **Daily monitoring:** ongoing monitoring by police of Blue Card holders for any changes in the information.
- **Risk management:** a system of risk management by organisations undertaking regulated child-related employment, which is overseen by Blue Card Services.

In March 2025, more than 1 million Queenslanders, or nearly one in five people, held a Blue Card.<sup>6</sup> A total of 216,003 Blue Card applications were finalised during 2024–2025, including 2,736 outcomes that prohibited the applicant from working with children.<sup>7</sup> In 2024–2025, Blue Card Services cancelled or suspended 501 Blue Cards because of ongoing monitoring. Between 2011–2012, 25 per cent of negative notices were overturned on review by the Queensland Civil and Administrative Tribunal.<sup>8</sup> While there has been a decrease in the number of appeals lodged for Blue Card decisions over the last five years, the number of matters pending has not decreased proportionally.

### *What has the review heard so far:*

- The Blue Card system is a key part of Queensland's approach to child safeguarding; however, it can only prevent a person's employment if there has been a criminal charge or conviction for past offending or where other relevant matters that raise concerns have been substantiated.
- A Blue Card is a reactive tool and is unable to identify people who have not previously been detected for offending behaviours.
- A lack of understanding of the limitations of the Blue Card system may result in a false sense of security in organisations where workers hold a Blue Card.
- The Blue Card system is not designed to collect information on early indicators of harm or to identify patterns over time and across organisations, particularly where complaints about a person have been investigated and found to be unsubstantiated due to a lack of evidence.
- The implementation of a reportable conduct scheme in Queensland, which will commence in 2026, will improve the collation and sharing of this type of information.
- This could be further supported by the establishment of a national reportable conduct scheme and a national WWCC system to increase the visibility of perpetrators who move across jurisdictions to avoid detection.

### *The police system*

The Queensland Police Service (QPS) is responsible for investigating complaints of child sexual abuse to establish if there is sufficient evidence to determine that a criminal offence has been committed; protecting victim-survivors from further victimisation; and identifying, apprehending and charging offenders. QPS has specialist units that are focused on investigating and responding to child sexual abuse and preventing future harm:

- **Child Protection Investigation Unit (CPIU):** has primary responsibility for investigating reports of child sexual abuse made to QPS, along with responding to any youth-related crimes.
- **Child Abuse and Sexual Crime Group:** is responsible for investigating organised child sexual abuse, including technology-facilitated child sexual abuse.
- **Child Protection Offender Registry:** QPS is responsible for managing the Queensland component of the Australian Child Protection Offender Reporting Scheme established by the *Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004*.

QPS also partners with the Australian Federal Police (AFP), including through the Australian Centre to Counter Child Exploitation (ACCCE), which is focused on preventing child sexual abuse, and identifying and investigating technology-facilitated child sexual abuse in Australia.<sup>9</sup>

Available data shows that most cases of child sexual abuse never come to the attention of police. The Australian Bureau of Statistics found that 84 per cent of women and 99 per cent of men surveyed never made a report to police about their experiences of sexual abuse as children.<sup>10</sup> Of those that are reported to police, a substantial proportion do not proceed to the investigation or prosecution stages.

In 2023–2024 approximately 34 per cent of sexual assault and related charges against adults (for both child and adult victim-survivors) did not proceed to trial or sentencing.<sup>11</sup> Of those that did proceed to trial or sentencing, 80 per cent resulted in a conviction.<sup>12</sup>

### *What has the review heard so far:*

- While there has been a sustained focus on improving criminal justice responses to child sexual abuse, police face continued challenges in investigating these types of offences, including the high evidentiary threshold for prosecution. Officers must be satisfied there is sufficient evidence to prove a matter beyond reasonable doubt. This is especially difficult for young children who may not be able to talk or have a limited vocabulary.
- An investigation into a report of abuse that does not reach the necessary threshold to pursue criminal charges does not mean the abuse did not happen. Further action is needed to proactively identify and respond to any potential risks posed by individuals where criminal proceedings were not undertaken due to insufficient evidence.
- Families need to be supported and informed about the conduct and outcomes of a police investigation, and any other investigation undertaken by agencies in response to a report of child sexual abuse.

### *The effectiveness of complaint systems and the detection of risks to children*

Under current laws, any adult who reasonably believes that a child sexual offence has been committed must report the information to a police officer as soon as possible.<sup>13</sup> If an approved provider of an ECEC service reasonably believes that child sexual abuse is occurring or has occurred while a child is being educated and cared for by its service, they must notify ECRA within seven days of developing that belief.<sup>14</sup> The Australian Government has announced that from 1 September 2025, there will be a reduction in this mandatory notification timeframe from seven days to 24 hours.<sup>15</sup>

The review's initial findings show that more than one complaint was made about the offender to his employers, the ECRA, and QPS. Of these complaints, the available information suggests they were not always progressed, and information was not shared between agencies. Prior complaints made to QPS did not proceed to prosecution. This meant that up until the time of the offender's arrest in 2022, there were no pending investigations, charges or convictions against him, and he met all requirements to obtain and maintain a Blue Card.

## **Future actions**

In the coming months, the review will:

- issue further information requests to complete the information gathering process
- receive and analyse public submissions
- convene a second roundtable, focusing on the emerging themes and proposed findings
- continue to engage with victim-survivors and support them to make submissions to the review.

For enquiries or further information:  
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<sup>1</sup> Department of Education. (2025, May). *Regulatory data*. <https://earlychildhood.qld.gov.au/regulation/regulatory-approach/regulatory-data>

<sup>2</sup> Department of Education (2024). *Staff by position 2020-24*. Queensland Government. <https://qed.qld.gov.au/our-publications/reports/statistics/Documents/ecec-staff.pdf>

<sup>3</sup> *Education and Care Services National Law (Queensland)* s.3(2)(a)

<sup>4</sup> *Education and Care Services National Law (Queensland)* s.260 and *Education and Care Services Act 2013 (Qld)*. s.133.

<sup>5</sup> Department of Education. (2024, September) *Regulatory data: 2023-2024 FY summary*. *The Early Childhood Regulatory Authority: Regulatory data: 2023-24 financial year in review summary*

<sup>6</sup> Queensland Government (April 2025). *Blue card system statistics*. <https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/system/statistics>; Queensland Government (April 2025). *Queensland population counter*. <https://www.qgso.qld.gov.au/statistics/theme/population/population-estimates/state-territories/qld-population-counter>

<sup>7</sup> Queensland Government. (December 2024). *Blue card system statistics*. <https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/system/statistics>

<sup>8</sup> QFCC (2017). *Keeping Queensland's children more than Safe: Review of the blue card system* <https://www.qfcc.qld.gov.au/sites/default/files/2022-08/Review%20of%20the%20blue%20card%20system.pdf>

<sup>9</sup> Australian Federal Police. (n.d). *Crimes against children*. <https://www.afp.gov.au/crimes/crimes-against-children>

<sup>10</sup> Australian Bureau of Statistics. (2023, November). *Childhood abuse*. <https://www.abs.gov.au/statistics/people/crime-and-justice/childhood-abuse/2021-22>

<sup>11</sup> Queensland Government Statisticians Office. (2025). *Justice report Queensland 2023-24*. Queensland Government. [www.qgso.qld.gov.au/issues/7876/justice-report-qld-2023-24.pdf](http://www.qgso.qld.gov.au/issues/7876/justice-report-qld-2023-24.pdf)

<sup>12</sup> Queensland Government Statisticians Office. (2025). *Justice report Queensland 2023-24*. Queensland Government. [www.qgso.qld.gov.au/issues/7876/justice-report-qld-2023-24.pdf](http://www.qgso.qld.gov.au/issues/7876/justice-report-qld-2023-24.pdf)

<sup>13</sup> *Criminal Code Act 1889 (Qld)* s229BC

<sup>14</sup> *Education and Care Services National Law* s174(2)(c) and *Education and Care Services National Regulations* r175(2)(d)

<sup>15</sup> The Hon Jason Clare MP (Minister for Education) and Senator the Hon Dr Jess Walsh (Minister for Early Childhood Education and Minister for Youth). 16 June 2025. *Tougher child safety rules to help keep children safer in early education*. [Media Release] <https://ministers.education.gov.au/clare/tougher-child-safety-rules-help-keep-children-safer-early-education#:~:text=From%201%20September%202025%2C%20further,the%20current%207%20day%20window>