

Appendix

Appendix A: Methodology

The conduct of the Review

On 4 December 2024, for the first time since the Child Death Review Board was established in 2020, the Attorney-General used the power in section 29I of the *Family and Child Commission Act 2014* (the FCC Act) to ask the Board to carry out a review.

This section allows the Attorney-General, in exceptional circumstances, to ask the Board to carry out a stated review to identify opportunities for continuous improvement in systems, legislation, policies and practices and to identify preventative mechanisms to help protect children.

In this case, the Attorney-General requested that the Board consider the offending of Ashley Paul Griffith (the offender) as a case study to identify any weaknesses in the laws, policies, procedures and practices that occurred across the early childhood education and care (ECEC), police and blue card systems.

Terms of Reference for the System Response to Child Sexual Abuse Review (the Review) were approved by the Board on 20 December 2024 and were released publicly in January 2025. Under the Terms of Reference, the Board was required to:

1. establish a timeline of conduct by the offender
2. examine the legislative framework, policies and procedures that operated during the time of offending
3. identify the context of child sexual offending in Queensland
4. identify best practice for protecting children from sexual abuse
5. seek and consider the views and experiences of people directly impacted by the offender’s behaviour
6. analyse the legislative and policy framework in place to protect children from child sexual abuse
7. examine the responses of the early childhood education and care, police and blue card systems.

A dedicated team of seven staff was established within the Queensland Family and Child Commission (the Commission) to support the Board to conduct the Review. Two members of the team were secondees from the Queensland Police Service and the Department of Education.

Information requests

Pursuant to s29P of the FCC Act, the Board Chair can request information to support the Board to carry out its reviews. To inform the Board’s response to the Terms of Reference, the Chair used s29P powers to request information from government and non-government entities. In response to these requests over 20,000 pages of material were disclosed from relevant parties.

The Chair used the s29P information request powers 49 times to request information from government and non-government agencies.

Table 1: List of s29P requests 2024–25

Request type	Recipient	Request date
S29P	Australian Federal Police (AFP)	20-Dec-24
S29P	Queensland Police Service (QPS)	20-Dec-24
S29P	Department of Education (DOE)	20-Dec-24
S29P	Department of Justice (DOJ)	20-Dec-24
S29P	National Employment Agency	5-Mar-25
S29P	Queensland College of Teachers (QCT)	5-Mar-25
S29P	QPS	5-Mar-25
S29P	DOJ	5-Mar-25
S29P	DOE	5-Mar-25
S29P	Centre BS	11-Mar-25

Request type	Recipient	Request date
S29P	Centre WS	11-Mar-25
S29P	DOE	26-Mar-25
S29P	DOJ	19-May-25
S29P	QCT	19-May-25
S29P	National Employment Agency	20-May-25
S29P	Department of Families, Seniors, Disability Services and Child Safety	2-Jul-25
S29P	Centre EA	7-Jul-25
S29P	Centre UN	7-Jul-25
S29P	Centre WE	7-Jul-25
S29P	Centre KE	7-Jul-25
S29P	Centre GK	7-Jul-25
S29P	Centre GT	7-Jul-25
S29P	Centre IA	7-Jul-25
S29P	Centre CD	7-Jul-25
S29P	Centre AE	7-Jul-25
S29P	DOE	7-Jul-25
S29P	Centre EP	7-Jul-25
S29p	DOE	7-Jul-25
S29P	QPS	7-Jul-25
S29P	Australian Centre to Counter Child Exploitation (ACCCE)	7-Jul-25
S29P	Centre EA	7-Jul-25
S29P	AFP	8-Jul-25
S29P	DOJ	21-Jul-25
S29P	Centre BS	21-Jul-25
S29P	Centre WS	21-Jul-25
S29P	Centre OY	23-Jul-25
S29P	Centre MT	23-Jul-25
S29P	Centre EK	23-Jul-25
S29P	Centre EA	23-Jul-25
S29P	Centre GE	24-Jul-25
S29P	Centre MY	24-Jul-25
S29P	Centre WN	24-Jul-25
S29P	Centre WS	28-Jul-25
S29P	Centre EA	20-Aug-25
S29P	DOE	25-Aug-25
S29P	Centre WE	15-Sep-25
S29P	Centre EP	15-Sep-25
S29P	Centre MT	15-Sep-25
S29P	Centre KE	15-Sep-25

Consultation and research

Impacted parties and victim-survivors

The views and experiences of people directly impacted by the offender's behaviour were sought to ensure that the voices of victim-survivors, their families and former colleagues of the offender were central to the Board's understanding of the case and the issues under the Review's Terms of Reference.

The Australian Federal Police (AFP) made its communication portal available throughout the Review to allow the Board to contact known victim-survivors of the offender, and their family members. A call for submissions was released on 28 March 2025 through this portal and through the Board's website on 31 March 2025. The portal was also utilised to provide regular updates regarding the progress of the Review.

This engagement assisted the Board to identify gaps in the system responses and improvements needed to strengthen safeguards. To support this process and ensure trauma informed engagement with impacted parties, additional psychological and emotional support was implemented.

Research

The Board commissioned research to identify best practice across Australia and internationally in relation to protecting children from sexual abuse, identifying perpetrators and children at risk, and responding to allegations of child sexual abuse. To ensure the robustness of this research a targeted procurement process was undertaken with Griffith University, the University of New South Wales, the University of Sunshine Coast and the Australian Institute of Family Studies being successful in their proposals.

In addition, the Queensland University of Technology provided focused findings from the Australian Child Maltreatment Study that were relevant to the scope of the Review.

Stakeholder engagement

In February, the Chair reached out to 51 non-government stakeholders and experts, to invite them to consider preparing a submission addressing the issues before the Board.

The Chair also contacted children's and families' commissioners and advocates, ombudsmen and regulators in other jurisdictions in relation to research and policy work on the topic of child sexual abuse. This included seeking advice on any evaluations, assessments or reports that demonstrate the impact or effect of a reportable conduct scheme. Responses were received from:

- Tasmania
- Western Australia
- Northern Territory
- Australian Capital Territory
- Victoria
- New South Wales.

Policy roundtables

On 30 April and 25 July 2025, the Chair convened policy roundtables for Board members and experts, which included input from representatives of Marrawah Law and the universities contracted to conduct research for the Review. The roundtables provided an opportunity to identify and understand key contemporary issues and explore potential areas for recommendations that would address the identified system weaknesses.

Community submissions

In June, the Board issued a public call for submissions, and the submission period was open until 31 July. The Board took 19 submissions both verbally and in writing from:

- members of the community
- government entities
- non-government organisations.

Site inspections

The Chair of the Board attended:

- five of the ECEC services where the offending occurred
- the Australian Centre to Counter Child Exploitation
- the Child Abuse and Sexual Crime Group, QPS including Argos and members of the Northern Command Joint Anti Child Exploitation Team.

Government consultation

During the review period, we engaged with senior officers across relevant government departments through a targeted program of consultation. This included a structured recommendation scoping workshop, as well as a series of unilateral interviews where we sought to test and refine our emerging proposals. These conversations were deliberately one-way in nature: rather than inviting negotiation or shared authorship, we directed our enquiries to understand the current government response to the case study, and to gather intelligence on the likely feasibility, uptake, and impact of our recommendations. This approach allowed us to draw on the expertise and insights of senior officials without diluting the independence of the Board's analysis. The Chair convened a discussion with the chief executive of relevant Queensland government agencies to discuss the proposed recommendations, and consider any potential implementation risks.

Adverse comments

Under section 29L of the Act, the Board must not include any adverse information about an entity unless the entity has been given a copy of the information and is allowed a reasonable opportunity to make a submission. If a submission is made in relation to any adverse comment, in accordance with section 29L(2)(b), a fair summary of the information provided must be included in the Report. Feedback received highlighted the importance of the Board's review of this case, with the majority of entities providing clarifying details about their actions and responsibilities and requesting technical amendments to ensure factual accuracy. These changes have been incorporated into the final version of this Report. Although some entities have raised concerns about recollections shared with the Review by impacted parties, the Board's terms of reference explicitly required it to seek and consider the views of impacted parties to identify the lessons arising from their experience. It is therefore considered critical that these perspectives are published. The removal of victim perspectives and recollections simply because they are not evidenced, is another way the systems minimise victims.

Governance of the Review

Reporting

The Board committed to publishing regular reports regarding the progress of the Review and did so in April, June and September.

Over the course of the Review, the Board issued three progress reports to provide transparency, maintain accountability, and share emerging findings with government and stakeholders. Each report marked a significant phase in the work, documenting both the evidence gathered and the directions the Board was pursuing.

The first progress report focused on establishing the scope of the review and inviting impacted party and expert input. It set out the key agencies and processes engaged in responding to child sexual abuse and outlined the Board's early methodology for evidence collection and case study analysis.

The second progress report built upon this foundation by presenting preliminary thematic findings from the case study and the information collected to that date. It detailed systemic barriers that prevented effective identification and response to abuse, including shortcomings in information sharing, thresholds for intervention, and coordination between justice, child protection, education, and regulatory bodies. It was released alongside an open call for community submissions.

The third progress report announced the closure of submissions and released the Marrawah Law research paper.

Taken together, the three progress reports chart the evolution of the Review from exploratory mapping, through thematic analysis, to the development of evidence-based recommendations aimed at strengthening system responses to child sexual abuse.

These were all available to the public through its webpage.

What we do not know

The Board has sought to compile as comprehensive a timeline as possible regarding the offender's movements, employment, and conduct. Substantial and significant information was obtained, and we are confident that sufficient knowledge of the facts has been gathered to enable our systemic review. Noting this, however, there remain gaps in the evidentiary record. In particular, the Board has been unable to draw together details in relation to:

- **Casual employment in 2022:** The offender worked across at least five other centres on a casual basis, yet the Board has not been able to determine whether concerns about his conduct were raised at these sites, nor the extent to which any issues were recorded, escalated, or acted upon.
- **Social media allegations:** The source or nature of the claims that gave rise to a social media post alleging the existence of a 'paedophile ring' at Centre EA have not been identified.
- **Employment agency placements:** Key information about the offender's recruitment through the Employment Agency remains incomplete, including a list of all placements where he worked; confirmation of training, induction, and recruitment checks undertaken; records of complaints or concerns raised about his conduct; and the organisation's responses to such complaints.
- **Employment at Centres GE, WE, and BY:** The Board has been unable to confirm exact dates of employment at these centres, nor the reasons for the offender's termination at Centre GE.
- **Movements across jurisdictions:** The reasons for the offender's departure from Queensland, and his subsequent return, remain unclear.
- **Offending outside Queensland:** The scope of the Board's terms of reference prevents consideration of any alleged offending that may have occurred outside Queensland's jurisdiction.

While the Sentencing Remarks indicate that other concerns were raised about the offender's conduct, including on one occasion to health, individual victim-survivor records were not requested to uphold their privacy and given the systemic nature of the Review. These incidents were not otherwise able to be identified and verified in the investigative material. Furthermore, the Board's work has been impeded by a range of structural barriers. These include:

- **Inadequate recordkeeping practices:** Many organisations had poor or incomplete records, particularly in relation to casual staffing arrangements, recruitment and induction processes, and complaints management. Some centres attributed this to current record retention requirements, which mean that they are only required to retain employment and other records for a discrete period of time.
- **Closure of multiple centres:** The permanent closure of several ECEC services limited access to records and institutional knowledge.
- **Non-cooperation by organisations:** Three organisations initially refused to provide records, citing claims of legal privilege. Two of these later produced the requested documents. One Queensland State Government Department initially refused to provide requested records, citing Cabinet confidentiality and sensitivities, however appropriate documents were later provided.

Because we have avoided contact with the offender (in recognition that there is an active appeal of his sentence) we have limited information regarding the offender's personal and social life. This represents a critical blind spot in understanding the offender's childhood and pathway to offending, and how the offender may have gained access to children outside of his formal employment. In particular, there does not appear to have been systematic consideration of:

- the offender's interactions with children and families within his neighbourhood (noting that he resided at multiple addresses during the review period)
- whether the offender gained access to children through informal social, sporting, or cultural settings on weekends, evenings, or during holiday periods.

While we have some assurance that the offender kept meticulous records of his offending and that the appropriate police response was applied to this evidence, the Board considers that further exploration of these issues may have provided valuable insights into patterns of risk and opportunity beyond formal organisational settings. The appropriate time to conduct this deeper review will be when the criminal case is settled.

Overall, the conduct of this Review and the response from institutions raises concerns about organisational accountability and the adequacy of recordkeeping. In particular:

- The poor quality of recordkeeping, coupled with incomplete or inconsistent information about complaints, raises doubts about whether organisations are able to meet their responsibilities to identify and respond to risks of harm to children.
- The variable initial willingness of organisations to participate fully in this review calls into question the sector's readiness to cooperate under a statutory reportable conduct scheme.

These findings reinforce the need for clear legislative obligations on organisations to record, retain, and disclose information relevant to allegations of misconduct involving children.

Appendix B

Glossary of terms and acronyms

Term or acronym	Meaning
Agencies or organisations	
ABS	Australian Bureau of Statistics
ACCCE	Australian Centre to Counter Child Exploitation
ACEQCA	Australian Children's Education and Care Quality Authority
ACIC	Australian Criminal Intelligence Commission
AFP	Australian Federal Police
AIFS	Australian Institute of Family Studies
ALRC	Australian Law Reform Commission
ANAO	Australian National Audit Office
ASIO	Australian Security Intelligence Organisation
BCS	Blue Card Services, part of the Department of Justice
the Board	Child Death Review Board
CASCG	Child Abuse and Sexual Crime Group, as part of Queensland Police Service
COAG	Council of Australian Governments
the Commission	Queensland Family and Child Commission
CPIU	Child Protection Investigation Unit, as part of Queensland Police Service
CPOR	Child Protection Offender Registry part of the Queensland Police Service
DCYJMA	The former Department of Children, Youth Justice and Multicultural Affairs
DFSDSCS	Department of Families, Seniors, Disability Services and Child Safety
DJAG	The former Department of Justice and Attorney-General
DoJ	Department of Justice
DSS	Department of Social Services (Commonwealth)
ECRA	Early Childhood Regulatory Authority, as part of the Department of Education
FWC	Fair Work Commission
IACP	International Association of Chiefs of Police
IWF	Internet Watch Foundation
LHLQ	Labour Hire Licensing Queensland

Term or acronym	Meaning
NCMEC	National Center for Missing and Exploited Children, based in the United States
NDIS	National Disability Insurance Scheme
NOCS	National Office of Child Safety
NOHSC	National Occupational Health and Safety Commission
OAIC	Office of the Australian Information Commissioner
OBPR	Office of Best Practice Regulation
ODPP	Office of the Director of Public Prosecutions
QCAT	Queensland Civil and Administrative Tribunal
QCT	Queensland College of Teachers
QPS	Queensland Police Service
QSAC	Queensland Sentencing Advisory Council
QSAN	Queensland Sexual Assault Network
QUT	Queensland University of Technology
TDPS	Texas Department of Public Safety
UNSW	University of New South Wales
UWU	United Worker's Union
Legislation	
Child Care Acts	Child Care Act 1991 (Qld) and Child Care Act 2002 (Qld)
FCC Act	Family and Child Commission Act 2014 (Qld)
Child Protection Act	Child Protection Act 1999
Criminal Code	Criminal Code Act 1899
Child Safe Organisations Act	Child Safe Organisations Act 2024 (Qld)
ECS Act	Education and Care Services Act 2013
Fair Work Act	Fair Work Act 2009 (Cth)
IP Act	Queensland Information Privacy Act 2009
National Law	Education and Care Services National Law
National Regulations	Education and Care Services National Regulations
Penalties Act	Penalties and Sentences Act 1992
PPRA	Police Powers and Responsibilities Act 2000
Privacy Act	Privacy Act 1988 (Cth)
PSA	Penalties and Sentences Act 1992
SCAC Act	Sexual Crimes Against Children and Community Protection Measures Act 2020
WHS Act	Workplace Health and Safety Act 2011 (Cth)
WWC Act	Working with Children (Risk Management and Screening) Act 2000
Jurisdictions	
ACT	Australian Capital Territory
NSW	New South Wales
UK	United Kingdom

Term or acronym	Meaning
USA	United States of America
WA	Western Australia
Other Terms	
ACMS	Australian Child Maltreatment Study
AHPRA	Australian Health Practitioner Regulation Authority
AI	Artificial intelligence
Blue card	Working with Children Clearance, previously known as a 'positive notice', issued under the <i>Working with Children Act 2000</i> (Qld)
C3P	The Canadian Centre for Child Protection
CAC	Child Advocacy Centre
Carmody Inquiry	Queensland Child Protection Commission of Inquiry
CCTV	Closed Circuit Television
CDSMC	Community and Disability Services Ministers' Conference
CEM	Child exploitation material as defined in the Criminal Code, including child abuse material as defined in the <i>Criminal Code Act 1995</i> (Cth) May be referred to in quotes as 'child abuse material (CAM)' or 'child sexual abuse material (CSAM)'.
Child Safety Review	Review of Child Safety Arrangements under the National Quality Framework
CISS	Child Information Sharing Scheme
CPOR	Child Protection Offender Reporting Scheme
CPTED	Crime Prevention Through Environmental Design
CRIS	Growing Child Safe Organisations Consultation Regulatory Impact Statement
DBS	Disclosure and Barring Service
DIAS	Growing Child Safe Organisations Decision Impact Analysis Statement
ECEC	Early childhood education and care
ECT	Early Childhood Teacher
Forde Inquiry	Commission of Inquiry into Abuse of Children in Queensland Institutions
ICARE	Interviewing Children and Recording Evidence
ICT	Information and communication technology
ICSE	International Child Sexual Exploitation Database
Interagency Guidelines	The Queensland Government Interagency Guidelines for Responding to Children, Young People and Adults Who Have Experienced Sexual Assault or Child Sexual Abuse
IGIpop	Interview Guidance for Investigative Police Officers
IPC	Interdiction for the Protection of Children program
I2P	Invisible Internet Project, a browser allowing access to the darknet
JACET	Joint Anti Child Exploitation Taskforce
JCPRP	Joint Child Protection Response Program, in New South Wales
LADOs	Local Authority Designated Officers
MoU	Memorandum of Understanding

Term or acronym	Meaning
MSO	Most serious offence
National Principles	National Principles for Child Safe Organisations
National Redress Scheme	National Redress Scheme for Institutional Child Sexual Abuse
NOPS	National Offending Prevention System
NCCC	National Continuous Checking Capability
NGOs	Non-government organisations
NQF	National Quality Framework
NQS	National Quality Standards
NRS	National Reference System
NWSD	NDIS Worker Screening Database
the offender	Ashley Paul Griffith
OSHC	Outside School Hours Care
PIA	Preliminary Impact Assessment
PSS	Personal safety survey (conducted by the ABS)
PTSD	Post Traumatic Stress Disorder
QIP	Quality improvement plan
the Scheme	Reportable Conduct Scheme
the Review	System Responses to Child Sexual Abuse Review
Royal Commission	Royal Commission into Institutional Responses to Child Sexual Abuse
R4Q	Regulating for Quality
SORAG	Sex Offender Risk Appraisal Guide
the Standards	Child Safe Standards
SVO	Serious Violent Offences Scheme
TOR	The Onion Router, a browser allowing access to the darknet
VIS	Victim Impact Statements
VPN	Virtual private network
WASAPP	Worried About Sex and Pornography Project
WHS	Workplace Health and Safety
the Taskforce	Women's Safety and Justice Taskforce
WWCC	Working with Children Check





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