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Preventing child sexual abuse

A whole of system approach to prevention

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A whole of system approach to prevention

Preventing child sexual abuse

The more harm we prevent, the better we become as a society, not only because fewer children are hurt and abused, but also because the collective resources, trust and hope of our communities is strengthened. Prevention reduces both the personal and social costs of abuse, improves quality of life, and ensures that resources can be directed toward development and resilience rather than repair. The World Health Organization has long emphasised that *“prevention is better than cure”*, a principle equally relevant to the safety of children as it is to public health.

“*The most enduring and effective way to deter online harms is to address them before they occur.* - Julie Inman Grant, eSafety Commissioner

Perpetrators adapt and adjust to continue offending. For this reason, we must target harden any environment where children live, learn or play. Collectively we must work together to drive the structural reforms necessary to achieve sustainable, long-term change.

In the assessment of any system tasked with protecting children, prevention must stand as the central priority. While effective response mechanisms are essential when harm occurs, the overall wellbeing of our society depends on our capacity to reduce the incidence of harm in the first place.

“*A truly comprehensive prevention approach recognises the need to address not only individual risk factors, but also the broader social, environmental, and systemic conditions that create opportunities for abuse. By adopting a multi-faceted, layered approach, prevention efforts can be implemented across various levels and points in time, increasing the potential for sustained and meaningful change.*¹

By anticipating risks and putting safeguards in place, we avoid the immeasurable trauma caused when children are harmed and the heavy cost of reactive interventions. Nobel Laureate Amartya Sen put it more broadly when he argued that *“prevention is not only less costly than cure, it is also more humane”*.

Prevention is also more effective in creating the type of society to which we aspire. A society where children are loved, safe and have their rights upheld is one that unlocks human potential. The Australian Productivity Commission has observed that *“the more that is invested in preventing harm, the greater the long-term return to individuals, families and society”*.² Investment in prevention is not only an act of protection but also an act of nation-building.

Crucially, prevention strategies shift the burden from the individual child or family to the collective responsibility of communities, institutions, and governments. This reduces the likelihood of children falling through gaps in detection or intervention.

“*...the responsibility for preventing sexual abuse should never rest on children.*³

Primary prevention strategies are those that aim to stop harm before it occurs. They are universal in nature, targeting whole populations rather than specific individuals already known to be at risk. In the context of safeguarding children and building safer communities, these strategies play a foundational role in reducing vulnerability and fostering protective environments.

One of the most widely recognised primary prevention approaches is education and awareness-raising. This involves equipping children, families, and communities with knowledge about rights, risks, and protective behaviours. For example, school-based programs that teach children how to recognise unsafe situations and seek help have been shown to strengthen resilience and lower the likelihood of abuse. Parallel efforts focus on parents and caregivers, providing them with accessible information on positive parenting practices, child development, and safe online behaviours.

Another central strategy is environmental and situational design. By modifying physical, organisational, or digital environments, opportunities for harm are reduced. Examples include implementing clear child safety codes of conduct in organisations, ensuring safe physical spaces (e.g. open classrooms, supervision protocols), and building robust online safety measures. The principle is simple but effective: where risks are harder to exploit, harm becomes less likely to occur.

Policy and legislative frameworks also operate as primary prevention measures by setting community-wide expectations and minimum standards. Mandatory background checks, the National Quality Framework in early childhood education, and consistent reporting obligations across sectors are examples of universal safeguards. These mechanisms do not rely on individual vigilance alone; they systemically reduce risks by lifting baseline protections.

A further preventative measure lies in strengthening community capacity and social cohesion. Communities with strong networks, trust, and inclusion are more resilient and better able to protect children. Initiatives such as parent support groups, local community hubs, and culturally tailored services help create environments where children are visible, valued, and supported. These approaches also counteract isolation—one of the key conditions that offenders seek to exploit.

Finally, public health campaigns and universal service delivery are important tools. Campaigns that shift social norms (such as promoting child rights, gender equality, respectful relationships, and zero tolerance for violence) play a long-term role in preventing harm. Universal services, including maternal and child health, early childhood education, and accessible mental health supports, embed prevention within the everyday systems that touch all families.

Taken together, these strategies demonstrate that prevention is not a single action, but a layered and comprehensive effort. By embedding safeguards at individual, organisational, and community levels, primary prevention strategies work to make harmful conduct more difficult, less tolerated, and more easily identified when it arises.

As noted in a report on the Prevalence of child sexual abuse in Queensland (Results from the Australian Child Maltreatment Study) prepared for the Board:

A growing body of scientific literature has emerged in relation to the prevention of child sexual abuse in child-serving organisations... These scientific works reflect a solid consensus about the types of preventative measures that child and youth-serving organisations must take in order to best prevent sexual abuse of children in their care.

This accumulated body of knowledge complements a similar comprehensive suite of recommendations for making institutions safe for children, made by the Royal Commission Into Institutional Responses to Child Sexual Abuse in its 2017 Final Report...The recommendations from both the scientific community and the Royal Commission form an essential reference point for future prevention initiatives. Within a range of measures, key focus areas include: prioritising child safety in organisational policy; education and training of staff and leaders about the nature of child sexual abuse, the organisational policy, and their reporting obligations; creating codes of conduct, including prohibitions of high-risk behaviours; monitoring of staff conduct; screening and hiring of staff on intake; rigorous processes for reporting and responding to allegations of concern; reducing opportunities for offending through situational prevention; processes for implementation and auditing; and collaboration with parents and children.⁴

Approaches to prevention

Current prevention efforts in Australia are predominantly focused on education in primary schools and other community settings. While this is important, to be effective, a proactive, multi-level, whole of community approach is needed. This means that we need to target the conditions which give rise to abuse.

Put simply, effective prevention requires a whole of system approach to child safety, and a comprehensive understanding of the complex factors that contribute to risk. The socio-ecological model, a well-established public health framework, helps identify and address these factors across multiple levels—societal, community/organisational, interpersonal, and individual.⁵ This model enables policymakers and practitioners to design prevention strategies that are context-sensitive and holistic.

At the societal level, laws, policies, and cultural norms shape attitudes and behaviours that can either protect children or enable abuse. At the community and organisational level, environments such as early childhood education and care (ECEC) settings play a critical role, where poor supervision or lack of safeguards can increase risk. Individual and interpersonal factors, while less central to this report, also contribute to vulnerability and offending.

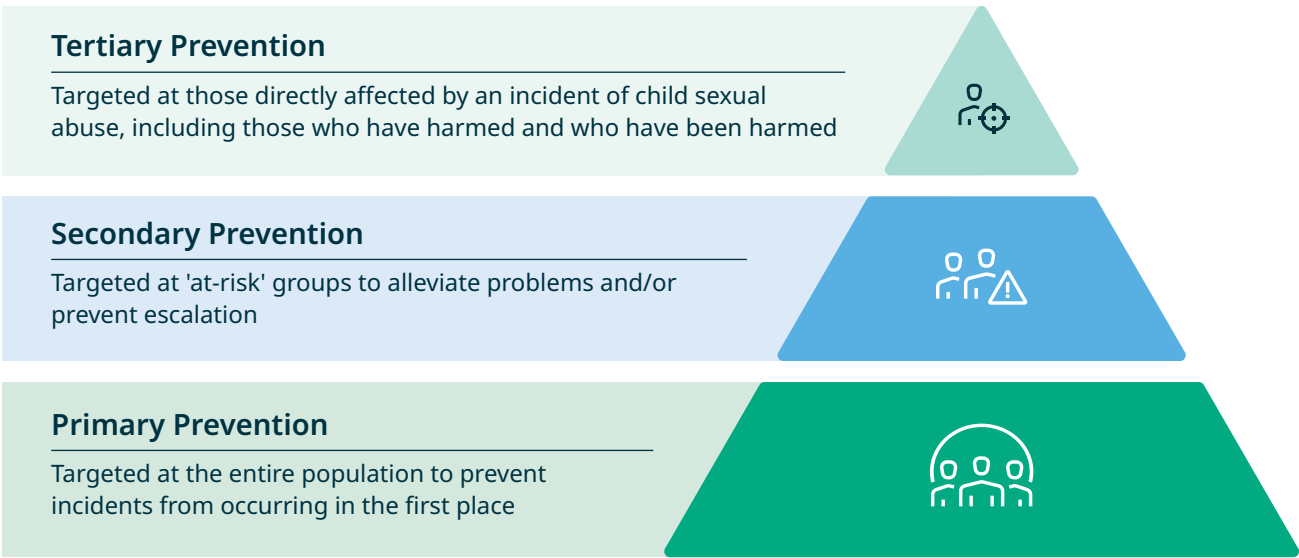
In addition to the socio-ecological model, situational crime prevention offers a complementary approach.⁶ It focuses on modifying environments to reduce opportunities for offending to occur especially in settings where children gather, such as ECEC services. This approach aims to make abuse more difficult, risky, and less rewarding for perpetrators by improving supervision, policies, and physical safeguards.

Research also suggests that best-practice approaches to prevention adopt a holistic approach focusing on whole of community (primary), interventions targeting specific people or places (secondary), and strategies after harm has occurred (tertiary).⁷ All three are required to provide a strong framework to reduce the extent and impact of child sexual abuse. Current prevention approaches tend to target the primary and secondary levels of the public health model of prevention (with the exception of some community programs which are targeted to where harm has occurred in the past and are therefore tertiary).⁸

Figure 1: Public Health Prevention Model

Source: USC report p.4, Eck 2003

Integrated Prevention Matrix



Developed by Smallbone and Rayment-McHugh (2017) the Integrated Prevention Matrix combines the public health model with Eck's crime triangle.⁹

Expanding on routine activity theory, Eck's crime triangle (2003) considers the necessary elements for any crime to occur, such as the offender, setting and victim (inner triangle). The outer triangle represents guardianship in that any of these (handler, place manager, guardian) may intervene on any element to prevent or stop the crime from occurring.

The model suggests that crime can be prevented by addressing one or more of the following components:

- Reducing opportunities for perpetrators to offend
- Reducing the vulnerabilities of potential targets or victims
- Designing and using spaces that reduce the opportunity for crime to occur.¹⁰

Motivated offenders are more likely to offend when little effort is required, the risk of detection is low, and the offending behaviour promises a highly desired reward.¹¹ If while going about their normal day-to-day activities the components in the outer triangle are strong, motivated offenders will either have to increase their effort because the risk of detection is higher or will not offend.¹² The evidence before the Board is clear that the offender in this case sought to reduce guardianship by circumventing or exploiting existing organisational and regulatory safeguards. This highlights the importance of all organisations taking steps to ensure motivated offenders have less opportunity to offend.

Figure 2: Eck's Crime Triangle




Source: USC report p.4, Eck 2003



The integrated prevention matrix is considered to be an effective means of comparing the systemic level of a prevention measure against its intended target. This framework takes into consideration people and places, as well as the three levels of prevention (e.g. primary, secondary and tertiary).

Figure 3: The Integrated Prevention Matrix

Source: USC report p.3, Smallbone & Rayment-McHugh 2017

Target	Primary	Secondary	Tertiary
 Perpetrator	Prevent risk of offending	Prevent behaviours from escalating into offending	Prevent repeat offending by addressing risks/needs
 Victim-Survivor	Prevent risk of victimisation	Reduce risk of victimisation	Address harm caused by offence and prevent revictimisation
 Setting	Prevent opportunities for offending	Reduce or limit opportunities for offending	Improve safety to prevent future offending

Prevention efforts need to encompass the full spectrum of these targets, and the Integrated Prevention Matrix provides a framework for preventing child sexual abuse across all three prevention levels.¹³ As also noted by participants in a study undertaken by Griffith University to inform this Review, motivated offenders will always exist. While we can seek to reduce their risk of offending, we can ultimately prevent more abuse by improving guardianship, increasing the skills of all staff, and changing our environments to reduce opportunities for offending and increase capacity for detection.¹⁴

*"I think you need to look very simply at Routine Activity Theory. Particularly if you're dealing with very young, pre-verbal children. The notion of capable guardianship is absolutely critical. [ECEC employees] need to internalise the notion that in order to keep these kids safe, all of us here need to be capable and responsible guardians."*¹⁵

Implications for prevention

While the prevention of child sexual abuse is something we all must strive for, the Board heard from multiple stakeholders that the current approach appears fragmented, somewhat duplicative and inconsistently funded. The *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030* is intended to guide prevention efforts in Queensland and across Australia under the themes of:

- **Awareness raising, education and building child safe cultures:** including through the implementation and promotion of the National Principles for Child Safe Organisations, the delivery of a national awareness raising campaign on child sexual abuse, and through the provision of resources for teachers, children and young people's education on wellbeing, relationships and safety, including online.
- **Enhancing national approaches to children with harmful sexual behaviours:** including by increasing workforce capability for preventing and responding to children displaying this behaviour and supporting the community to better understand this issue.
- **Offender prevention and intervention:** including by launching an offending prevention service for adults who have sexual thoughts about children.¹⁶

Prevent. Support. Believe. Queensland's framework to address Sexual Violence sets an objective that 'everyone works together to bring about cultural, behavioural and structural change to prevent sexual violence.'¹⁷

Key actions seek to:

- Increase knowledge and understanding of sexual violence and its drivers in the broader community
- Equip families, children and young people with accurate information on healthy relationships, consent and sexual violence
- Challenge attitudes, practices and structures that lead to sexual violence and stop people speaking out
- Strengthen the capacity of workplaces and institutions to prevent sexual violence
- Implement targeted prevention and early intervention activities tailored for and designed by specific population groups.

Queensland's Framework establishes a range of key commitments, however actions are not distinct to the prevention of child sexual abuse and instead apply to all forms of sexual violence including sexual assault, sexual harassment, technology-facilitated sexual violence, child sexual abuse and youth sexual violence. In seeking to encompass all types of sexual violence, there is a clear risk that the focused and targeted action needed to combat child sexual abuse will be lost, or never fully actualised.

The need for a clearer prevention strategy was outlined in a recent report by the e-Kidna group, a collective of Act for Kids, Bravehearts and the Daniel Morcombe Foundation on primary prevention initiatives against child sexual abuse in Australia which highlighted a range of challenges with the current approach.

To date there is no implementation of a National Prevention Framework for CSA [child sexual abuse]. This would include evidence-based primary, secondary and tertiary initiatives to work towards ending CSA. An important element is a shift in funding models and theoretical approaches to the response to CSA from a reactive based system to an approach that aims to prevent CSA. The National strategy to prevent and respond to child sexual abuse, and the work of the National Centre for Action on Child Sexual Abuse is a step forward, but further shifts in funding from tertiary prevention to primary prevention will be required and additional support for potential perpetrators. The jurisdictional review revealed a significant disparity in the emphasis on primary prevention for childhood physical abuse and child maltreatment compared to CSA. The focus on childhood physical abuse and child maltreatment was found to receive more than twice as much as the attention than that given to CSA. This is disproportionate when considering the prevalence of each issue, with approximately 8.5% of adults reporting experiences of childhood physical abuse and 7.7% of adults reporting experiences of CSA.

This report ultimately found that:

- *Australia lacks a national prevention framework to eliminate child sexual abuse*
- *implementation of current primary prevention initiatives is sparse and ad-hoc*
- *there is a paucity of primary prevention initiatives solely focused on child sexual abuse*
- *current initiatives are primarily focused on upskilling children on protective behaviours rather than shifting responsibility and education to adults*
- *there is limited collaboration across sectors*
- *positively, contemporary approaches to child sexual abuse are emerging.*¹⁸

To inform its understanding of best practice responses the Board engaged the University of Sunshine Coast to develop a comprehensive report on preventing child sexual abuse.

This report highlights a range of common elements in effective collaborative prevention models include:

- **Systemic coordination:** Institutions must actively share responsibility for the prevention of and response to child sexual abuse.
- **Education empowerment:** Teaching children about boundaries and rights in age-appropriate ways.
- **Caregiver engagement:** Families are integrated into prevention and safeguarding programs.
- **Integrated service hubs:** Local services, police, schools and child protection are co-located or linked in structured systems.

Research also shows three areas of consideration which are essential for program delivery:

- **What prevention messages are these programs/strategies delivering?** - This relates to content and messaging.
- **How are these programs/strategies delivering these messages?** - This relates to selecting the appropriate forum, delivery mode and engagement technique
- **How do these programs/strategies address diversity?** - Diverse cohorts (for example Aboriginal and Torres Strait Islander people, people living with disability, people who identify as LGBTIQ+) have unique needs that must be addressed to maximise program delivery outcomes.

Table 1: Considerations for designing prevention strategies

Contextual prevention	<p>Be informed by crime prevention through environmental design (CPTED) and situational crime prevention strategies.</p> <p>Be multilevel, targeted at individual, environmental, system and cultural factors.</p> <p>Tailored to the particular needs of at-risk cohorts and responsive to the contexts in which abuse occurs.</p>
Co-design with young people	<p>Be locally designed and led.</p> <p>Ensure relevance and trust through community partnerships, especially Aboriginal and Torres Strait Islander communities.</p>
Focus on equity, access and inclusion	<p>Challenge generic “evidence-based” models by asking who the program works for, and in what context.</p>
Advocate and embed realistic evaluations	<p>Embed evaluation from program start.</p> <p>Focus on what works, for whom, and under what conditions.</p>

Education and awareness raising

“

The problem is with people not having confidence to report internally. The better option is to target that with education, awareness, capability building, and just really taking active steps to change the culture of the sector.¹⁹

”

Preventing child sexual abuse requires proactive, evidence-based strategies that reduce risk before harm occurs. Among available interventions, structured education for children and parents has emerged as the most effective, scalable, and sustainable method of prevention. By empowering children with knowledge and skills to recognise and respond to inappropriate behaviour, and by equipping parents and caregivers to create safe environments and communicate effectively with children, education addresses the root causes of vulnerability rather than reacting after abuse has occurred.

One of the most significant advantages of education is that it reduces risk by empowering children. Evidence indicates that children who receive age-appropriate education about body safety, personal boundaries, and consent are far more likely to recognise inappropriate behaviours and disclose concerns early. By equipping children with knowledge and skills, education transforms them from passive potential victims into informed participants in their own protection.

Equally important is the role of parents and caregivers. As the first line of defence, adults who are educated about grooming behaviours, the signs of abuse, and effective ways to communicate with children become better able to prevent harm. Engaged parents can reinforce protective behaviours, provide guidance, and create an environment in which children feel safe to raise concerns, further reducing opportunities for abuse to occur.

Education also has a broader cultural and systemic impact. Programs that inform both children and parents foster a culture of openness, awareness, and zero tolerance for abuse. When communities are informed, abuse is less likely to be concealed, and social norms shift toward early reporting and proactive prevention. This cultural change strengthens organisational and community responses, making child safety a shared responsibility rather than an isolated obligation.

From an economic perspective, prevention through awareness raising and education is highly cost-effective. By reducing the incidence and severity of abuse, educational initiatives help avoid long-term costs associated with police and child protection investigations, criminal justice proceedings, health interventions, and the social and economic impacts experienced by victim-survivors over their lifetime. Investment in education therefore offers substantial returns, not only by safeguarding children but also by reducing downstream societal costs.

Finally, education aligns closely with national and state safeguarding frameworks. The National Principles for Child Safe Organisations and *Queensland's Child Safe Organisations Act 2024* emphasise participation, empowerment, and the active engagement of families as central to child protection. Programs that educate children and parents directly support these principles, embedding child safety into organisational culture, reinforcing protective practices, and ensuring that safeguarding is a proactive, rather than reactive, endeavour.

Awareness campaigns and education programs have a role to play in normalising conversations and addressing stereotypes about child sexual abuse, and building the confidence of parents, carers, and other adults to identify potential signs of abuse.

In their submission, one participant advised of having worked in the ECEC sector previously, having started their career in 2003. They recalled some improvements over time, however the quality of care for the children depended on the size of the centre and the organisation. They reflected on one Church based organisation as caring and providing the best service to the children in their service. The staff were paid appropriately, and the ratios were above those of minimum standard. Other services that were owned by international investors, appeared to them to centre around profits and the service provision was “substandard”. While professional development, training, policies and procedures were somewhat better in those centres where wellbeing of the children appeared to be the priority, they reflected never having any training regarding recognising, recording and/or reporting sexual abuse of children. They reported never having received training regarding grooming and the majority of the training focused on physical wellbeing of the children. Although some practices have improved, they emphasised the need for ongoing professional development and appropriate staff remuneration.

The Board was advised that “it is difficult to identify the best content areas, pedagogy (instructional techniques) and delivery modes for teaching programs targeted at children and young people”. However, research conducted by the Australian Institute of Family Studies to inform this Review advised that:

...effective programs for children aged 2–8 years should incorporate the following features:

- *having four or more sessions*
- *active parental involvement (while acknowledging, and dealing sensitively, with the reality that not all parents are a source of safety for children)*
- *input from children, parents and professionals from a range of cultural backgrounds, to ensure culturally appropriate and sensitive content*
- *holistic implementation wherein discussions around CSA form part of sexuality education*
- *rigorous evaluations.*

Further, the Tasmanian Commission (2023) found that good educational CSA prevention programs must:

- *commence as early as possible, initially being delivered by parents*
- *include discussion of body parts, ownership of bodies and touching of bodies*
- *involve group interactions for school-age children, including with teachers*
- *use diverse and engaging resources and materials*
- *be delivered over long time frames with shorter sessions.*²⁰

Expert Professor Kerryanne Walsh indicates that children and young people should have ongoing sexual abuse prevention education throughout their entire education, including in child care and kindergarten.²¹

*Bravehearts have Ditto the lion telling kids what to do if they feel butterflies in their tummy and that's great – but it's once a year for an hour. That doesn't by any means mean that all our children are getting it or that all centres are providing that. We need to do more.*²²

As articulated in the final report of the *Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings*:

*It is not the responsibility of children and young people to prevent abuse, but we consider evidence-based education can give children and young people greater confidence to identify and report safety issues, and reduces their vulnerability to grooming and exploitation. Child sexual abuse education can challenge myths and misconceptions and provide the opportunity for children to understand consent, respectful relationships and the important role bystanders can play. This is critical knowledge that will assist efforts to keep children and young people safe into adulthood and contribute to generational change in the incidence of child sexual abuse. We also expect parents and carers will indirectly benefit from these programs, which can help inform their own conversations about safety with their children. Given how common child sexual abuse is, we consider this education will also help people respond more sensitively to disclosures they may receive from family, friends and others in their lives.*²³

This aligns with Trew and colleagues' finding that knowledge and skills are retained better when reinforced over time.²⁴ Prevention through education and community-based programs has two aims:

- To equip children, educators and parents to identify and respond to harmful behaviour and abuse by delivering education which is ideally tailored to their setting and demographic
- To deliver prevention services with a place-based approach that responds to the particular risks in a location or environment.

Key elements of effective education programs also include:

- Being tailored to the developmental stage of recipients
- Delivered by professionals trained in child safeguarding
- Built on the belief that adults are responsible for preventing abuse
- Culturally informed and community-led, particularly in Aboriginal and Torres Strait Islander communities and culturally and linguistically diverse audiences
- Contain the information to equip caregivers and professionals to reinforce prevention messaging
- Target potential perpetrators and high-risk settings, not just victims.²⁵

Common themes emerged in a study undertaken by Griffith University to inform the Board's review, supporting the call for increased age-appropriate education on topics like body boundaries and safe touch, which starts early, and encourages open conversations about uncomfortable issues.²⁶ Support was also provided by participants in this study for public awareness campaigns and to encourage both families and bystanders to trust their instincts and report concerns.²⁷

In submissions to the Board, the Aboriginal and Torres Strait Islander Legal Service have strongly recommended primary prevention and early intervention strategies:

We strongly recommend primary prevention and early intervention strategies which include targeted education for parents, responsible adults/caregivers and children that: covers body safety; raises awareness of grooming behaviours; equips adults to detect early warning signs of abuse; empowers children to disclose abuse safely; and strengthens knowledge relating to how parents and responsible adults/caregivers can escalate complaints regarding concerning conduct.

Bravehearts further submitted that community awareness and outreach campaigns including Stop it Now! are effective at improving knowledge, dispelling myths, and encouraging help-seeking behaviours. They also note that primary prevention requires cultural changes around perceptions of gender, violence, and inequality. They suggest that primary prevention services should be funded and coupled with measures to drive cultural change that child sexual abuse is a preventable behavioural issue as well as a criminal one.

These programs reflect an important shift toward public health-informed approaches that view child sexual abuse not only as a criminal issue but also as a preventable behavioural and societal problem.

Education for employees, managers and executives in organisations that work with children should also focus on protective behaviours. Protective behaviour training, such as that provided by NAPCAN, is intended to “equip services with the tools and strategies to consistently embed high-quality, child-safe practices” in their centres. Protective behaviour training should fulfil Principle 7 of the National Principles for Child Safe Organisations, “Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training”.

This type of training should be complementary and additional to programs available to children. For example, Bravehearts take a holistic approach to child safety by teaching children personal safety skills and strategies to help keep them safe and educating adults in child protection. Ditto’s Keep Safe Adventure Program is a live incursion for early learning centres and primary schools which meets the needs of different age groups. To complement this live performance, classroom kits and learning resources have been developed as well as a mobile game app. The aim of the program is to teach children personal safety strategies and help them build confidence and resilience to keep them safe. Child Protection Online Training Courses are also offered to those supporting and working with children. The training is specifically designed to complement the personal safety education program.

Project Paradigm provides training to professionals and agencies involved with children and young people to understand the complex nature of child sexual exploitation. Two in person workshops are available, with one focused on preventing child sexual exploitation through building understanding of the processes of control, common risk indicators, and impacts. The other workshop seeks to ensure professionals and agencies are better equipped to work with impacted children and young people.

The Daniel Morcombe Foundation also takes a holistic approach to child safety to provide education to a wide-reaching audience. There are a wide range of *Keeping Kids Safe Resources* which include books, factsheets, videos and so on for both children and adults to learn about personal safety education. *Bright Futures* includes a broad range of workshops, webinars and podcasts for adults to address the issues of problematic and harmful sexual behaviours, child exploitation material (CEM), and technology assisted harmful sexual behaviours. This is complemented by events such as the *Day for Daniel* and *Walk for Daniel* which the whole community can be involved in.

Recent research underscores the critical role of school-based education programs in preventing child sexual abuse. A recent meta-analytical study reviewed existing research into school-based educational programs for preventing any form of child abuse, offering valuable insights into the components of effective prevention programs.²⁸ This study identified several essential elements that contribute to program effectiveness:

- Programs should teach children that abuse is never their fault and equip them with strategies to escape threatening situations and seek assistance.
- Enhancing self-esteem, assertiveness, and emotional literacy is crucial for building resilience and reducing vulnerability.
- Children benefit from understanding personal rights, body boundaries, and the nature of abuse, including how to recognise risky situations.
- Programs should facilitate identification of trusted adults and encourage safe disclosure of abuse.
- Post-program support is essential to reinforce learning and address any emotional impacts.

Previous studies demonstrate that children who participate in such programs show:

- increased knowledge about abuse and protective behaviours
- improved self-protection skills
- greater likelihood of disclosing abuse.

Programs that emphasise emotional development and counteract self-blame are particularly effective. Research commissioned by the Review identified examples of best-practice education and engagement in Australia and other jurisdictions.²⁹

Table 2: Examples of child sexual abuse education and prevention programs in Australia and other jurisdictions

School-Based Programs	Parent and Caregiver Education	Professional Development Programs	Community-Based Strategies (Perpetrators)
<p>Ditto's Keep Safe Adventure (Australia): Early childhood safety skills with songs, activities and parental involvement.</p> <p>Love Bites (Australia): Respectful relationships education for secondary students, preventing both victimisation and perpetration.</p> <p>Cyber Echo (Australia): An education resource for teachers to educate primary school aged children about online safety.</p> <p>Australia's Biggest Child Safety Lesson (Australia): A day connecting schools to resources run by the Daniel Morcombe Foundation.</p>	<p>Stewards of Children (USA): Evidence-informed training for adults on child sexual abuse signs and responses.</p> <p>Safe Touches (USA): In-home child safety training for caregivers of children with intellectual disabilities.</p>	<p>J-SAFE (Japan): Teacher training to identify and report signs of child sexual abuse.</p> <p>Programs for early childhood educators on grooming behaviour, trauma-informed care, and reporting obligations.</p>	<p>Operation RESET (WA): Police and therapist teams visit communities with known offenders to educate and prevent further harm.</p> <p>Prevention Project Dunkelfeld (Germany): Anonymous treatment for people at risk of offending before any crimes occur.</p>

Figure 4: Important components of prevention based education



While education aimed at young children can be effective, it also places the onus on children to protect themselves. This has limited benefits when pursued in isolation of other initiatives and sends a harmful community message. Further, lack of an overarching strategy for the delivery of education for children in early childhood and school settings leads to inconsistency in the content and quality of this education, resulting in gaps. A systemic strategy to the delivery of education is needed.

In its submissions to the Board, PeakCare advocated for a whole of community prevention package to equip adults with the knowledge, confidence and responsibility to identify and challenge harmful attitudes and behaviours. There is also a need to ensure that programs are appropriately funded and cover the risks children face when navigating the online environment:

*'Given the ingenuity and relentlessness of online predators, and the ever-increasing appetite for new and depraved material in the child exploitation material market, those education initiatives must continue to be properly funded and delivered in a robust way by providers. The threat to children from online predators is very real, and is growing in magnitude and volume. The importance of impressing that message upon young people in an appropriate way cannot be overstated.'*³⁰

Operational Recommendation 13: Empowering children through consistent and contextual safety education

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No child should have to learn about their rights through the experience of having them violated - Survivor-advocate

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Currently, the responsibility for raising awareness of safety and risk among children falls largely on individual teachers, school initiatives, or non-profit organisations. While protective behaviours are referenced in the national curriculum, there is no mandated framework or consistent approach to ensure that all children receive this essential knowledge. As a result, the quality and consistency of safety education varies widely, and many children may miss opportunities to learn how to recognise and respond to abuse, grooming, or unsafe situations.

The early years are a critical window for laying the foundation of personal safety, self-awareness, and resilience. Research confirms that protective behaviours education in early childhood enhances children's capacity to recognise unsafe situations, assert boundaries, and seek help. Equipping children with language and confidence at this formative stage builds lifelong protective factors and helps interrupt cycles of abuse. - Act for Kids submission

The Daniel Morcombe Foundation delivers Australia's largest child safety lesson, demonstrating both the scale and effectiveness of a coordinated, expert-led approach. However, these types of initiatives remain supplementary rather than universal.

Research and experience demonstrate that knowledge is a protective factor: children who understand boundaries, grooming tactics, and how to seek help are significantly more likely to disclose concerns or avoid risky situations. By bringing these elements together into a coherent, mandatory framework, Queensland has the opportunity to ensure that every child receives age-appropriate, evidence-based instruction in personal safety.

Despite the growing evidence on the effectiveness of education in preventing child sexual abuse, there remains a significant gap in our national and state approaches to embedding prevention within schools.

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Prevention in this case is about education. Educating children with age appropriate materials at different stages throughout their development is critical. Educating professionals who work with children in either teaching units of work themselves, or supporting third party educators. Educating parents, families and the community on child sexual abuse on recognising the signs - Lived experience advisor

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...the delivery of school-based child sexual abuse prevention is not mandated in Queensland state education curriculum, the Queensland Catholic Schools curriculum or the Australian Curriculum.³¹

Opportunities to equip children with knowledge and awareness about safety, boundaries, and recognising inappropriate behaviour are currently underutilised. This gap represents more than just a missed chance to protect children; it also limits the broader capacity of our systems to detect, disrupt and deter potential offenders. By failing to provide consistent, structured education across all schooling sectors and grade levels, we inadvertently leave both children and educators without the tools necessary to respond effectively to early warning signs of abuse. The University of Sunshine Coast research conducted to inform the Board's review of this case found that:

The absence of mandated school-based child sexual abuse prevention strategies across state, Catholic, private, and the national curricula places the responsibility for delivering child sexual abuse prevention education initiatives upon individual schools and educators, creating an inconsistent approach to prevention. We emphasise the significant oversight in failing to provide school-based child sexual abuse prevention as part of the curriculum.³²

Furthermore, when we asked the University of Sunshine Coast to review the educational material provided to children 'all appeared to exclude that children are never to blame for their victimisation and online safety messaging'.³³ This is a critical missed opportunity. The Royal Commission made clear that:

*When left unaddressed, the internalised shame and stigma that arises in response to experiencing child sexual abuse can have detrimental long-term impacts across several psychological and wellbeing indicators. Hence, ensuring program content and messaging explicitly inform children that abuse is never their fault could help to limit some of the longer-term harm, if a child does experience abuse.*³⁴

Online safety also requires prioritisation and education programs can play a vital role in promoting this. Internet use is a regular and consistent feature in children's lives. Embedding child safety education within schools in a structured and consistent way would support broader community awareness. Parents, carers, and educators could rely on a clear curriculum that equips children with practical strategies for navigating both physical and online environments. This approach ensures that safeguarding is proactive, systematic, and integrated into everyday learning, rather than dependent on individual initiative.

Operational Recommendation 13: Empowering children through consistent and contextual safety education

That the Australian and Queensland governments mandate the delivery of a structured child safety and protective behaviours curriculum across all schools, drawing on best-practice programs to ensure that every child receives consistent knowledge and skills to recognise, respond, and report unsafe situations.

Operational Recommendation 14: Empowering parents through resources, awareness and education

Parent-focused education programs play a critical role in preventing child sexual abuse by equipping parents and caregivers with the knowledge, skills, and confidence needed to protect children. These programs operate in several interconnected ways: they increase parental awareness of child sexual abuse, strengthen the ability to recognise and detect abusive behaviours, support effective communication of safety messages to children, and enhance parents' skills to safely intervene in situations that may be inappropriate.

Effective training should reflect the shared responsibility of safeguarding by incorporating strategies that are complemented by education for parents and carers. Strengthening protective environments in both home and care settings requires equipping all adults in a child's life with the knowledge and confidence to respond to concerns. This includes supporting kinship carers, foster carers and residential care workers, to understand their role in safeguarding and recognising signs of abuse. PeakCare encourages the [Board] to consider how the rollout of mandatory training can contribute to a broader culture of safety, and to recommend implementation supports that ensure it is accessible to all parts of the workforce. - Peakcare Submission

Through participation in these programs, parents gain accurate information about what constitutes abuse and are able to challenge and dispel common myths surrounding child sexual abuse risks.³⁵ Importantly, parents are guided on how to communicate these safety messages to their children in a clear and age-appropriate manner, reinforcing protective behaviours and fostering environments where children feel informed and empowered to speak up if they feel unsafe.³⁶

By focusing on the central role of parents and carers, these programs provide a foundation for proactive prevention, positioning adults as key agents in reducing both the opportunity for abuse and the long-term impacts of victimisation.

While children benefit from safety and protective behaviours education, parents and carers remain a critical layer in safeguarding. Currently, guidance for parents on recognising grooming, responding to disclosures, and supporting children through safety education is inconsistent. Many parents rely on informal sources, individual educators, or non-profit programs for information, leading to gaps in awareness and confidence when addressing child safety issues.

Parent-focused child sexual abuse education programs are designed to equip parents and caregivers with the knowledge, skills, and confidence necessary to protect children from sexual abuse, both in-person and online. These programs recognise the critical role that parents and caregivers play in the early prevention, detection, and response to child sexual abuse. By building the capacity of adults responsible for children, these initiatives contribute to creating safer environments and reducing opportunities for abuse.³⁷

As articulated by the University of New South Wales in research that it conducted for the Board:

Evidence specific to [early childhood education and care] ECECs highlights the following family/parental risk factors that make children more vulnerable to CSA in an institutional context:

- lack of knowledge about the signs and symptoms of CSA [child sexual abuse],
- lack of knowledge about risk factors specific to ECECs,
- lack of involvement with the childcare institutions, and
- close relationships with ECECs staff, which makes parents more reluctant to raise concerns or believe disclosure.

Parents are often reluctant to believe cases of CSA that do not align with their expectations of the nature of the abuse or the profile of the offender, for example, in the case of a female offender. However, overall, parents tend to underestimate their children's vulnerability to sexual abuse while simultaneously overestimating their own ability to recognise the signs of abuse and children's capacity to disclose it".

The importance of these programs is particularly pronounced for children in the early childhood cohort, typically aged two to five years, who are especially vulnerable to adverse and traumatic experiences and may face long-term developmental, emotional, and social impacts as a result of abuse. In recognising diverse caregiving arrangements, these programs should encompass both parents and carers, acknowledging that some children may be cared for primarily by people other than their biological parents, and that not all parents maintain an active caregiving role.

Parent-focused child sexual abuse education programs operate within both primary and secondary prevention frameworks. They deliver content and messaging designed to prevent sexual abuse of children before it occurs while also targeting adults who may be at risk of engaging in abusive behaviours. By addressing both protective and preventative dimensions, these programs strengthen family and community systems, enhance adult vigilance, and contribute to the broader goal of reducing the prevalence and impact of child sexual abuse.

The University of Sunshine Coast advised the Board that:

*Parents and carers are an important resource in child sexual abuse prevention. Parents and carers are uniquely positioned to provide key messaging and reinforce children's learning about child sexual abuse prevention at home.*³⁸

Health services are also uniquely positioned to provide evidence-based awareness-raising materials and guidance to parents, including information on developmental considerations, signs of distress, and strategies for open communication with children. ECEC settings are also pivotal: these environments are often the first institutional spaces outside the family where children spend significant time, and staff must be trained to observe behaviours of concern and identify risk. By making targeted information available to parents in these settings, families can be equipped with knowledge to reinforce protective behaviours at home, recognise concerning behaviours, and respond appropriately to disclosures

Embedding a standard requirement for both health services, and ECEC providers to actively deliver guidance to parents would normalise conversations about safety and create a consistent community-wide approach. This proactive dissemination of knowledge ensures parents are empowered to act, reduces the likelihood that concerning behaviours go unnoticed, and strengthens the protective ecosystem around children.

Operational Recommendation 14: Empowering parents through resources, awareness and education

That the Queensland Government fund the production of key communication materials for parents and caregivers, which are available in settings frequently accessed by families. These materials are to provide accessible, evidence-based child safety education resources, and that early childhood education and care settings actively make information available to parents on:

- protective behaviours
- recognising grooming (including grooming of parents, organisations and children)
- identifying signs of distress, and
- responding to disclosures.

This initiative should be supported by a coordinated strategy across providers of health services early childhood services, and neighbourhood centres to ensure parents receive consistent, practical, and actionable guidance to safeguard children in both home and care settings.

Contextual prevention

The physical layout for organisation's activities or the organisation's setting can hide or expose child sexual abuse; with the physical structure of an organisation playing an important role in creating 'safe environments' for children and young people.

Contextual prevention refers to strategies designed to strengthen environmental, social, cultural and physical factors to better prevent, identify and respond to child sexual abuse. Rather than focusing solely on individual perpetrators or victims, this approach targets the settings and conditions in which abuse occurs.³⁹ This approach acknowledges that human behaviour is shaped by context, and by modifying environments, whether physical, social, or institutional, opportunities for abuse can be reduced.⁴⁰ It is complementary to individual focused interventions by making places safer alongside making people safer.⁴¹

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Traditional child sexual abuse prevention has focused on individual-level strategies, whereas contextual prevention models address the environmental and situational factors that enable abuse. Because youth-serving organisations are high-risk settings for CSA, contextual strategies must protect children in the environments they occupy daily. Safeguards should be tailored to specific contexts, as risks differ across schools, childcare, sports, arts, religious institutions, hospitals, and online spaces - Survivor-advocate

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Reflecting back on Routine Activity Theory discussed in more detail in Part A, unsupervised access or lack of guardianship provides opportunities for motivated offenders to commit abuse. Efforts can be made to increase guardianship through legislation, policies and procedures, as well as changes to physical environments and supervisory practices which increase guardianship. This will impact on the routine activities of potential perpetrators by reducing their opportunities to interact with potential victims in unsupervised or minimally supervised environments.

Contextual prevention of child sexual abuse comprises prevention efforts that target factors external to the individual, addressing macro-level and micro-level structures to create safer environments for children and young people.

In a study undertaken by Griffith University to inform this Review, participants highlighted the importance of creating safe environments in early childhood settings by implementing situational crime prevention strategies.⁴² These include ‘the rule of two’ or ‘four eyes’ policy, controlled access, CCTV monitoring, and appropriate staffing ratios for effective supervision. It acknowledges that motivated offenders exist but aims to reduce risks by targeting guardians, places and managers. Key measures include no phones on the floor, clear risk signage and special focus on high-risk areas like nappy changing and toileting.

“

*It is critical that educators can design a learning space to meet the needs of the children in their charge and to align with their organisation’s learning philosophy. However, this cannot in anyway compromise the safety and wellbeing of children. As such, blind spots, cubbies, forts with no line-of-sight etc do not promote or maximise the safe supervision of children.*⁴³

”

Submissions received from community members called for a range of contextual prevention measures, including two people needing to be in attendance when children are being changed, and phones and cameras should not be allowed:

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*What is predictable is avoidable! Due diligence means to take the appropriate, expected, or necessary attention, precautions or reasonable care required, to protect the health, safety and welfare of all staff and children.*⁴⁴

”

Contextual prevention operates along a macro-to-micro continuum:

- Macro-level strategies address broader social and structural factors, such as gender inequality, cultural norms and values, and legal and policy frameworks.
- Micro-level strategies focus on proximal influences and situational risks, including lack of supervision, physical environments that allow private access to children and social dynamics that discourage disclosure or detection.⁴⁵

Micro-level interventions such as Crime Prevention Through Environmental Design (CPTED) and situational crime prevention, aim to reduce opportunities for abuse by modifying environments and contexts.⁴⁶

Environmental criminology highlights the dynamic interplay between individuals and their surroundings, showing how specific environmental features can shape opportunities for criminal behaviour. This perspective underpins both situational crime prevention and guardianship strategies, which aim to reduce offending by modifying environmental conditions. Effective environmental prevention strategies must consider:

- the importance of identifying contextual factors contributing to abuse
- the value of community collaboration
- the need to ground interventions in local realities
- the effectiveness of place-focused strategies in preventing abuse by reshaping environments and social dynamics.⁴⁷

Online contextual prevention: Keeping children safe in digital environments

The digital environment presents some of the most complex safeguarding challenges of our time. Unlike physical spaces, where adults and systems can monitor and regulate access, the online world operates across devices, platforms, and contexts that are constantly evolving. The Board heard evidence that a contextual prevention approach, tailoring interventions to the device, platform, and behavioural environment, offers the most effective strategy for protecting children online.

Device-level prevention: At the most immediate level, prevention begins with the devices that children use. Parents and carers can make use of built-in tools such as parental controls and screen time limits, helping to set boundaries around usage and access to age-appropriate content. Biometric access controls can prevent unauthorised use of devices, and geolocation technology allows parents to implement GPS-triggered restrictions that automatically reduce online risks in certain locations, such as school or late-night environments. These tools empower families to shape the digital contexts children operate in, much like setting boundaries in the physical world.

Platform-level prevention: Technology platforms hold significant responsibility for child safety. Contextual interventions such as real-time pop-ups can disrupt unsafe interactions or alert children to risks in the moment. Platforms should be required to share intelligence about offenders across services, ensuring that harmful actors cannot simply migrate from one platform to another. Further, advances in artificial intelligence allow for real-time alerts to be sent to caregivers if unusual or concerning patterns of online behaviour are detected, offering an additional layer of protection that bridges the digital and physical worlds.

Behavioural and environmental contexts: Perhaps the most critical layer of prevention lies in shaping behaviour and environment. Families can foster digital resilience in children by equipping them with the skills to recognise peer pressure, online manipulation, and grooming behaviours. Simple, practical routines such as charging devices outside bedrooms overnight, encouraging shared use in family spaces, and establishing technology-free zones or times, help create safer environments. These habits not only reduce risk, but also normalise healthy digital practices that children carry into adulthood.

Towards a holistic approach: Online contextual prevention requires the alignment of responsibility across individuals, families, technology companies, and governments. It recognises that no single tool is sufficient. Just as in offline safeguarding, a layered approach creates the strongest safety net. Device controls, platform accountability, and behavioural strategies must work together, supported by regulation and community education, to ensure that children can participate in digital life without being exposed to unacceptable risks.

Strengthening contextual prevention approaches within institutional settings

Crime prevention through environmental design focuses on altering physical spaces to deter potential offenders and increase supervision. Strategies include:

- conducting environmental audits to identify risk points
- improving visibility through lighting and architectural changes
- installing access controls in schools and youth organisations.

Examples include adding glass panels to classrooms or interview rooms, moving computers into shared spaces or installing CCTV to improve surveillance in public areas. Examples of CPTED which are relevant to the prevention of abuse in institutional settings include:

- eliminating enclosed or hidden spaces within centres where perpetrators can isolate children
- improving line of sight by landscaping and pruning in outdoor spaces, installing glass walls and doors in indoor spaces and ensuring they are kept clear of obstructions
- increasing the level of surveillance, both by creating more opportunities for employees to monitor each other in shared spaces, and by installing overt surveillance systems (i.e. CCTV).

Situational crime prevention is another approach to contextual prevention which targets individual behaviours (including perpetrators, co-workers, children and parents) to disrupt abuse. The aim is to deter offending behaviour by:

- increasing the effort required to commit an offence, through increased guardianship, adequate recruitment and staffing, and institutional safeguarding procedures
- increasing the risks of committing an offence, through increased guardianship and supervisory practices, physical layout and design, installing CCTV and clear codes of conduct
- reducing the rewards of an offence, through reduced access to personal devices
- removing excuses for breaking the law, clear safeguarding policies and procedures and codes of conduct.

Examples include training staff to identify and respond to abuse, encouraging community involvement in safeguarding and promoting protective parenting practices, such as open communication and supervision. Situational crime prevention also supports online interventions, including warning messages and chatbots, which reduce opportunities for online child sexual abuse to occur.

Place-Based Crime Prevention involves targeted approaches which seek to reduce crime in known hotspots or high-risk environments. These strategies recognise that place influences behaviour, and that prevention must be tailored to the specific risks and dynamics of each location. There are six key principles for place-based prevention:

- identify locations of concern
- understand the problem at a local level
- develop locally informed prevention plans
- establish and consult with local advisory groups
- implement and monitor prevention activities
- evaluate outcomes and share knowledge⁴⁸

Place-based strategies often incorporate CPTED and situational crime prevention techniques, and may apply to entire communities, not just individual sites.

Consultation and research undertaken to inform this review consistently highlighted the importance of strengthening contextual prevention. The University of New South Wales have suggested that child safeguarding in ECEC settings can be improved by:

- safeguarding protocols specific to high-risk tasks such as toileting
- design requirements for ECEC settings, including the use of CCTV and other measures to reduce the concealment of abuse in the physical environment
- implementation of the “four eyes” principle, to ensure that no childcare staff member is alone with a child
- routine, rigorous, and independent evaluation of these programs and measures.⁴⁹

The Board noted opportunities for strengthening contextual prevention across the different centres where abuse occurred. This was most evident in the physical design of centres, which included cubby houses, forts and enclosed spaces that children played in with limited visibility. One centre's risk assessment discussed an enclosed area that the children used as a 'cubby' and would play with torches in. Children also liked to 'box' themselves in the space. Specific measures were required by ECRA as part of the service approval for this centre, that included the installation of mirrors to enhance supervision of this space, which also had dual access.

The physical design of centres which further restricted supervision also presented a risk. For example, storerooms inside classrooms did not have locks and had no viewing panels. One classroom was divided by a whiteboard, which prevented educators on one side from seeing what was happening on the other side. In interviews conducted by ECRA after the offending was detected, this centre maintained that 'staff can see each other all the time' and that 'there's nothing to be changed.'

Although the use of the classroom has now changed, meaning there are more teachers, the whiteboard still divides the classroom, preventing clear line of sight of other children and educators, and the storerooms are solid doors with no locks. Another centre had frosted doors between different classrooms, meaning that educators cannot see between both rooms.

There is overwhelming evidence in this case that the offender created opportunities for abuse to occur by placing sheets over an outdoor fort, placing images and posters on windows, and keeping blinds closed during rest times, despite children being split between indoors and outdoors. While all centres are required to comply with minimum staffing ratios, supervisory practices across centres also meant that the offender was frequently left alone with children. Rest pause or rest period conditions resulted in the offender being left alone with children in at least three centres during sleep and rest times, for up to an hour.

In one centre, the offender was witnessed by parents multiple times to be alone with children during pick-up. In a different centre, the offender was left to manage a classroom on his own, despite being an agency contractor.

Policies and procedures further normalised children being alone with one carer. For example, one centre's policies allowed for children to be taken to the director's office for "special" time or for children to have one-on-one time with a teacher if they needed support with their behaviour.

Changes made after the offending was detected

There have been a raft of changes announced since the offending was detected in ECEC settings including those that aim to strengthen contextual prevention through the use of CCTV, the removal of rest period conditions in Queensland and banning of the use of personal devices in centres.

Some of the centres where the abuse occurred also provided the Board with advice on the changes that they had made since the offending was detected. Responses included a focus on contextual prevention strategies to improve guardianship through:

- increased supervision by requiring a minimum of two staff to be rostered, which exceeds regulatory requirements
- amendments to supervision plans, to ensure a clear line of sight
- a cessation of the use of rest period conditions
- the installation of glass doors in storage areas, kitchens and rooms
- restrictions on technology and device use
- regular centre visits, auditing and spot checks to ensure compliance.

Information was also sought from centres where there was no known offending about their safeguarding practices, and responses emphasised that they had a strong focus on contextual prevention when the offender worked there. For example, one centre reflected that the physical layout of the service meant that it had 'high structural visibility' which acted as a potential deterrent. The offender was also supervised during the entire shift that he worked there.

One centre where the offender worked recommended a range of regulatory and policy reforms to the Board to strengthen educator safety, accountability and child protection across the sector. This included changing regulations to always require a minimum of two staff so that no educator is alone with children and removing rest period conditions from service approvals.

Putting CCTV in focus

Notably, following his arrest the offender reported that he 'did not offend in other centres because they had cameras', referring to closed-circuit television surveillance (CCTV). While recent government commitments and community conversations have focused on the installation of CCTV in centres to improve visibility and supervision, this is just one aspect of an effective approach to situational crime prevention.

CCTV in ECEC settings has been described as 'a game changer' which protects both children and educators from incidents and allegations of abuse and inappropriate discipline.⁵⁰ CCTV has been used by centres to evidence inappropriate discipline by educators, and regulators have used this evidence in their own investigations.

However, CCTV is not a fail-safe solution. It requires that consideration be given to how CCTV footage is collated, stored and accessed. It also poses potential risks if this footage is accessed inappropriately and consideration must be given to its safe retention. CCTV requires consistent monitoring and review of footage to detect offending. Research indicates that CCTV is best used as a crime-prevention measure in circumstances where opportunistic property crime is a risk.⁵¹

As articulated by one of the centres that the offender is known to have offended:

Serious consideration needs to be given as to the usefulness of CCTV cameras. CCTV will not prevent abuse but could assist in substantiating abuse if an allegation is made. There is also the concern that unintentional content could be developed, such as a child removing their clothing and going to the locker to get new clothes. Moreover, consideration needs to be given to concerns regarding the hacking of systems and this footage then becoming available to external parties.

The recent *Review of Child Safety Arrangements under the National Quality Framework* (the Review of Child Safety Arrangements) also found that research into the presence of CCTV in ECEC settings indicated that while it provides 'the perception of preventing harm', it is not effective at preventing incidents.⁵² Indeed, the presence of CCTV in ECEC settings raises unique concerns for the privacy of children and parents and has compliance implications.

Under the *Commonwealth Privacy Act 1988* (the Privacy Act), recorded images of an individual are personal information and people must be notified before such a recording is carried out. Recordings must be destroyed or deidentified once they are no longer required. The Privacy Act applies to ECEC in each jurisdiction as if it were a law of that jurisdiction under the National Law.⁵³ It therefore applies to all Queensland ECEC providers.

Further, the *Queensland Information Privacy Act 2009* (the IP Act) applies to state schools and other government agencies, and any ECEC service attached to them. The IP Act requires agencies to only collect CCTV that is reasonably necessary for one or more of the functions of the agency, to take reasonable steps to inform individuals about the recording, and to securely store recordings.

In recognising that CCTV is likely to be installed as a risk mitigation strategy, the Australian Children's Education and Care Quality Authority (ACECQA) Review of Child Safety Arrangements found that 'providers need clear guidance about the development of policies covering communications with families, educators and all staff about the use of CCTV and how CCTV footage is collected, used and stored.'

The Board was further advised by the Australian Institute of Family Studies that:

ACECQA's findings about CCTV are consistent with extensive criminological research around CCTV, which indicates its benefits are of most value in circumstances involving property crime, specifically in carparks. In the review report, ACECQA recommended (at recommendation 2.6) that ECEC services who install cameras must also have appropriate policies in place (ACECQA, 2023).⁵⁴

Recent national commitments that seek to deliver on recommendations from the Review of Child Safety Arrangements mean that all centres are required to have established policies and procedures about the safe use of digital devices, including the use of CCTV. Where services have, or are intending to use, CCTV, they will be required to:

- inform families of its use, including the purpose of its use
- explain how data is stored, secured and accessed
- ensure timely access to CCTV footage to regulatory agencies and police where requested.

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The use of CCTV in spaces where services are delivered to children cannot be considered a 'quick fix' – if implemented, it must be accompanied by the development and promotion of cultures which prioritise child safeguarding.⁵⁵

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‘Under the roof’ ratios and rest period conditions

Under the NQF, child-to-educator ratios are calculated across the service, not by individual rooms, and are based on the youngest child in care. This is referred to by the sector as an ‘under the roof ratio’. The effect of this is that an educator does not need to be collocated with a child attributed to them in the ratio calculation. This approach does not however remove the need for adequate supervision to be the primary consideration.

The National Regulations require the educator-to-child ratio to be maintained no matter what activity the children or the educators at the service are undertaking. Some jurisdictions, including Queensland, have specific provisions which modify these ratio requirements when educators are taking short breaks and are not working directly with children. In Queensland a service was previously able to have a rest period condition which allowed for one or more periods during a day, totalling not more than two hours during that day, for educators to care for a greater number of children than under the standard ratios.⁵⁶

ECRA has confirmed that rest period conditions were in place in five of the 11 centres where there was known offending in this case. Following investigations into these centres, ECRA advised that:

While some incidents did occur during rest periods, investigations found that rest period conditions themselves were likely not a causal or a direct contributing factor to the offending. However, given the correlation of some patterns of offending with rest periods, we have identified this as a time when heightened vigilance is therefore required, a position inconsistent with the reduced staffing levels facilitated by rest period conditions.

For this reason, ECRA advised that they undertook a comprehensive review of Queensland-specific rest period conditions, including options for legislative reform as part of Project Safeguard. This included working with the early childhood sector to raise awareness of risks to the safety of children associated with sleep and rest time and encouraging voluntary amendment of service approval to remove rest period conditions. As a result, 330 services in Queensland with a rest period condition voluntarily surrendered their condition.

In October 2025 the Queensland Parliament passed legislation that removed the ability for approved providers to hold rest period conditions on their service approvals under both the National Law and the state-based Education and Care Services Act. This means that existing rest period conditions will no longer be in effect from 1 January 2026, and services will have to comply with national educator-to-child ratios at all times.

It is evident that the offender in this case perpetrated abuse against children when there was low or minimal supervision. The available information suggests that staff members were often the sole educator with children including during rest times, a period in which the offender is known to have committed abuse. In Centre EA, where the offender was the Director, it appears that he may have kept enrolments deliberately low to avoid staff ratio requirements. Parents whose children had been directly impacted by the offending also raised concerns to the Board about child-to-educator ratios, particularly during rest periods, because it provides opportunities to target children by limiting adult witnesses and facilitating access to groggy or unconscious victims.

There are also other persons in some of the CEM footage the offender created, with the duration of recordings varying from approximately 8 seconds to 30 minutes. In one centre he compiled over 50 hours of CEM. These are not isolated instances or momentary lapses of supervision, it demonstrates a sustained pattern across centres and over time. These issues are also not isolated to this case. A recent survey conducted by the United Workers Union of over 2000 early childhood educators highlighted significant concerns with ‘widespread understaffing’ and ‘constant breaches of child-to-educator ratios’ which were impacting children’s safety and placing children at risk.²⁸

The United Workers Union Early Childhood Education and Care Quality and Safety Census found that:

- 77 per cent of educators reported operating below minimum staffing levels at least weekly, and 42 per cent responded that it was happening daily.
- 75 per cent of educators believed that regulators should not allow centres to avoid legislated minimum staffing requirements by issuing waivers.
- 83 per cent of educators strongly agreed that the ‘under-the roof ratio’ compromises the safety and wellbeing of children.²⁹

Embedding contextual prevention into early childhood education and care settings

Early childhood is a critical window for prevention. Children under five are developing their understanding of the world and are forming attitudes towards behaviour that they carry with them into adolescence and beyond. Children at this age are also particularly at risk of harm because they are less capable of identifying abuse to themselves and their peers, are highly dependent on caregivers, and are less able and less likely to articulate experiences of abuse to trusted adults.

By employing evidence-based prevention measures, and reducing opportunities for abuse to occur, staff can be empowered to report concerning behaviour. The high demand on the ECEC sector impacts the ability of parents to identify when providers are properly implementing prevention measures. Parents lack the confidence to properly interrogate issues at the provider level.

The dominance of profit-motivated ECEC providers is a further barrier to crime prevention through environmental design measures. In older or established centres, these often require costly modifications to be made, and further regulation in the absence of additional funding to implement the changes required may result in non-compliance. Regulatory collaboration may be a mechanism to drive improvements in contextual prevention. For example, regulatory approvals for construction and renovation of commercial premises are an opportunity to introduce crime prevention through environmental design principles.

An agency who has all the policies and procedures in the world, still might not translate into the right culture on the ground with the people in the agency. Policies and procedures are only as good as your people on ground, and in particular your leaders, and not just executive leadership, but middle management as well.⁵⁷

Operational Recommendation 15: Requiring organisations to improve active supervision of children

Effective safeguarding in environments where children are cared for, educated, or supervised requires both technological and human oversight. CCTV and staffing ratios are frequently discussed as standalone mechanisms to protect children, but evidence and expert opinion indicate that their value is maximised when integrated within a broader culture of proactive safeguarding.

CCTV provides a record of interactions and can deter inappropriate behaviour because it increases the likelihood of detection, supports investigations, and helps to identify non-compliance, risks and persons of concern. However, cameras alone do not prevent abuse; they are passive tools and may provide a false sense of security. Similarly, staffing ratios are intended to ensure that children are never left in situations where abuse could occur undetected, but ratio requirements are insufficient if organisational culture and accountability are weak. For example, even with high staffing numbers, isolated supervision of children can occur if policies are not clear or staff do not follow procedures.

A strong safeguarding culture requires that it be highly unusual, and only under clearly defined circumstances, for a worker to be alone with children. Risk management processes must be embedded to ensure that deviations are reported, documented, and addressed through supervisory oversight. Organisations should analyse incidents or near misses to continuously improve staffing allocation and supervision practices, supported by CCTV as a verification and investigative tool rather than a substitute for active supervision.

Importantly, the effectiveness of surveillance—both human and technological—is amplified when directors, company owners, and boards are held accountable. Clear legal liability ensures that safeguarding measures are not treated as merely compliance obligations or reputational safeguards but as proactive, protective mechanisms. Where leadership is accountable for failures in supervision or surveillance, organisations are more likely to cultivate a culture in which staff are vigilant, reporting is robust, and risk management is genuinely preventative. Integrating CCTV and staffing ratios within this accountability framework shifts safeguarding from passive observation to active prevention. It supports early detection of risks, ensures timely responses, and embeds child safety as a central responsibility of every organisational decision, from the boardroom to frontline care.

Operational Recommendation 15: Requiring organisations to improve active supervision of children

The Queensland Government use its regulatory and oversight schemes to require all ECEC sites to develop their own unique proactive Safeguarding Plan focused on active supervision.

Each plan should include:

- clear and published active supervision staff ratios that are transparent regarding under-the-roof, and rest-break calculations
- ensuring policies, training and built environments make it unusual for any worker to be alone with vulnerable children, with clearly defined exceptions and reporting requirements
- embedding risk management processes that require incidents, near misses, or deviations from supervision protocols to be reported to senior management and oversight bodies
- using CCTV not as a substitute for active supervision but as a complementary tool to verify compliance, deter misconduct, and support investigations where this is appropriate and the negative consequences are addressed.

This integrated contextual approach will ensure that surveillance—both human and technological—is part of a culture that prioritises child safety, promotes accountability at all organisational levels, and effectively prevents harm.

An organisational culture of prevention

The prevention of child abuse within organisations cannot be reduced to policies, procedures, or compliance mechanisms alone. While these structures are necessary, they are insufficient without a culture that places children's safety and wellbeing at its centre. An organisation's culture—its values, norms, and daily practices—fundamentally shapes whether safeguarding commitments are meaningful in practice or remain rhetorical.

As submitted by the Archdiocese of Brisbane:

'...cultural change, vigilance, and systemic reform – rather than blanket exclusion or technological fixes – are the cornerstone of safeguarding. Evidence demonstrates that genuine safeguarding is best achieved through robust recruitment, comprehensive training, clear accountability structures, and a culture where concerns are recognised and reported. Simplistic solutions that rely on exclusion or surveillance do not address the systemic gaps identified by this inquiry and would ultimately divert focus and resources from the reforms that are most needed. This reinforces the earlier distinction between safeguarding as a proactive cultural framework and child protection as a responsive mechanism. Proposals such as restricting male participation or mandating surveillance risk blurring these categories, diverting attention from the systemic reforms required to genuinely keep children safe.'

Research, system reviews and inquiries consistently show that abuse is most likely to occur and persist in environments where authority is unquestioned, children's voices are marginalised, and transparency is absent. Conversely, organisations with open, accountable, and child-centred cultures are best positioned to detect risks early, empower children and families, and intervene before harm escalates.

"early childhood prevention strategies must be implemented in the context of creating child-safe environments that provide safety outside of the educators too".⁵⁸

A child safe culture involves more than a passive commitment. It requires leadership, governance, and everyday decision-making to prioritise child safety even when doing so is inconvenient, resource-intensive, or disruptive to existing practices. The National Principles for Child Safe Organisations (endorsed by all Australian governments) establish cultural foundations for prevention:

1. **Child safety embedded in leadership, governance, and culture:** Prevention is not an add-on, but part of the organisation's identity. Leaders model behaviours and make safeguarding a standing agenda item in strategic and operational decisions.
2. **Children and young people are informed and participate:** Cultures that actively listen to children are more likely to pick up on early warning signs of risk and prevent abuse.

3. **Equity is upheld, and diverse needs are respected:** Abuse thrives in environments where some children are invisible. A culture that recognises and responds to vulnerability ensures risks are not overlooked.
4. **Staff are equipped with knowledge, skills, and awareness:** Training and professional development reinforce a culture where safeguarding is everyone's responsibility, not the remit of a few specialists.
5. **Complaints and concerns are taken seriously and responded to:** A transparent, just culture ensures children and adults trust the system enough to disclose concerns, reducing opportunities for abuse to be hidden.⁵⁹

The National Principles for Child Safe Organisations were developed to provide a consistent, evidence-based framework for safeguarding children across all sectors. Endorsed by all Australian governments, the national principles articulate that child safety must be embedded in leadership, governance, and organisational culture, and that children's voices must be central to decision-making processes. They provide a foundation for organisations to create environments where children are respected, empowered, and protected from harm.⁶⁰

Workforce capability is also essential in supporting a strong organisational safeguarding culture. The Australian Childhood Foundation advised the Board that:

There are no clear minimum requirements for the quality, content, or mode of delivery. Most training lacks lived experience perspectives and does not adequately address children's relational needs – how they communicate, how they build trust, and how they perceive risk. As a result, we cannot be confident that all organisations are equipping their staff and volunteers to understand, prevent, identify, and respond to child sexual abuse effectively.

This failure to standardise safeguarding training across the sector risks leaving critical gaps, particularly in ECEC settings where children are most vulnerable and depend on adults to create safe, nurturing environments. Crucially, without a strong emphasis on prevention, we risk responding only after harm has already occurred. In its current form, the system also risks entrenching inequity. Different ECEC services have varying financial and time resources, which directly impacts their capacity to offer meaningful training. Without a mandated and funded baseline of competency, children in some settings will be less protected than others, particularly those from marginalised communities.

In Queensland, the National Principles were given legislative force through the *Child Safe Organisations Act 2024*, which commenced on 1 October 2025. This legislation marked a significant step forward, requiring organisations working with children to comply with ten Child Safe Standards, thereby translating the national principles into enforceable obligations. The standards are designed to ensure a systematic and proactive approach to safeguarding, extending beyond procedural compliance to the development of organisational cultures in which child safety is prioritised in every aspect of operations.

The 10 Child Safe Standards in Queensland reflect the national principles and emphasise:

- **Child safety embedded in leadership and culture:** Leadership must actively champion child safety, modelling behaviour and allocating resources to uphold this priority.
- **Children and young people's voices are central:** Policies and practices must ensure children can participate in decisions affecting them.
- **Equity and diversity are recognised:** Organisations must identify and address risks for children from culturally and linguistically diverse backgrounds, Aboriginal and Torres Strait Islander children, and other vulnerable groups.
- **Staff and volunteers are informed and supported:** Recruitment, training, and supervision practices must promote awareness of child safety responsibilities.
- **Families and communities are engaged:** Transparency, partnerships, and information-sharing help reinforce a culture of safety.
- **Procedures for responding to concerns:** Complaints, disclosures, and incidents must be taken seriously and managed promptly.
- **Risk management strategies:** Proactive identification and mitigation of risks to children in organisational activities.
- **Safe physical and online environments:** Protective measures must extend to all spaces where children engage with the organisation.
- **Human resource management and supervision:** Ensuring ongoing suitability of personnel through supervision, monitoring, and performance appraisal.
- **Continuous improvement:** Organisations must regularly review and update practices in response to feedback, incidents, and evolving evidence.

Together, the National Principles and Queensland's Child Safe Organisations Act establish a legislative and cultural framework for safeguarding children that moves beyond compliance toward proactive prevention. By embedding child safety into organisational culture, leadership, and practice, these reforms aim to create environments where abuse is less likely to occur and more readily detected, and where children and young people are recognised as active participants in shaping their own safety.

The difference between a compliant but unsafe organisation and a truly child safe organisation lies in culture. Two organisations may have identical policies, but the one with a defensive, hierarchical, or indifferent culture will be at higher risk of abuse occurring or being concealed.

An open, respectful culture makes policies come alive: staff challenge unsafe behaviours, children trust adults with concerns, and leadership responds to allegations without hesitation. This cultural dimension is why external oversight and standards-based regulation increasingly focus on requiring boards and executives to demonstrate cultural leadership, not merely procedural compliance.

The challenge for Queensland is overseeing and measuring how safe organisations actually are. The Australian Childhood Foundation reflected to the Board that:

The current system within early childhood education and care settings remains heavily weighted towards procedural compliance, with assessors focusing on whether services have the correct policies, forms and administrative requirements in place. While having clear documentation is important, this emphasis often comes at the expense of understanding how effectively child safeguarding is being embedded into everyday practice. As a result, opportunities to support services in developing authentic child-safe cultures are being missed.

Identifying and measuring culture is not easy. The Australian Institute of Family Studies drew on emerging research to:

"...recommend a survey that measures the following expertise and capability to assess the overall capability of an organisation to embody a child safe culture.

(a) awareness of organisational policies, practices and safeguarding culture;

(b) confidence to take action when a child or young person voices a concern about their safety and wellbeing;

(c) attitudes in relation to children and young people's knowledge and access to safety education; and

(d) knowledge about the risks and prevention of child sexual abuse".

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An uncomfortable conversation – prevention of child sexual abuse perpetration

“

If you think something can't happen here, you're already at risk because people have that mindset, right? People are operating in their own little worlds that 'it's just strangers', 'it's no one I know', or 'that would never happen to me'.⁶¹

”

While governments and community can seek to strengthen child safeguarding practices and build understanding through protective behaviour training and community awareness raising, focus also needs to turn to those responsible for the abuse. This ensures that perpetrators are held accountable for their actions and is intended to act as deterrent to others.

Tertiary prevention targeted at perpetrators can include a range of possible measures for people who:

- have not yet offended, but have an interest in or may be likely to sexually offend against children
- have engaged in, or are seeking to engage in, accessing or distributing child exploitation material (CEM) and may be at risk of contact offending
- have offended and need assistance or interventions to desist offending, including those who have yet to be detected for their offending.

Examples of tertiary prevention targeted at perpetrators which have been evaluated include:



The meaning of accountability

Perpetrator accountability is a multi-layered concept involving both individual responsibility and systemic action. At its core, it refers to a perpetrator acknowledging the harm they have caused and taking responsibility for their behaviour.⁶² However, accountability must also be embedded across the justice system and supported by community structures. Accountability is a 'complex, multi-layered and long-term task that requires attention at all points of the justice process.'⁶³

Effective accountability structures require a range of different interventions, which are tailored to a perpetrator's individual needs and patterns of offending.

Figure 5: Circles of support and accountability



Importantly, different forms of accountability can sometimes conflict. For example, legal accountability through prosecution may not lead to a personal acknowledgment of harm and may fail to validate the victim-survivor's experience. This tension highlights the need for a whole-of-community approach to accountability. Research also shows that rehabilitation and reintegration are most effective when delivered in tandem, with tailored interventions that promote desistance and community safety.

Measuring the 'effectiveness' of accountability strategies is complex. Studies often define effectiveness based on their own parameters, which may vary significantly. In this context, effectiveness is considered in terms of:⁶⁴

- reducing reoffending
- supporting perpetrator accountability
- improving community safety.

It is also important to note that many accountability strategies, particularly in rehabilitation and reintegration, are not specific to child sexual abuse perpetrators.⁶⁵ Much of the available research applies broadly to sexual offenders, with limited studies focused exclusively on child sexual abuse. Where specialised findings exist, they should be prioritised and further developed.

Stages of accountability

Accountability should be pursued across the entire justice continuum:



Prosecution: Legal consequences reinforce societal condemnation of abuse and uphold the rule of law.



Rehabilitation: Interventions can help perpetrators understand the harm they've caused and reduce the risk of reoffending.



Reintegration: Community-based support and monitoring are essential for long-term desistance and public safety.

As noted by the University of Sunshine Coast in research developed to inform this Review, perpetrator accountability is a significant policy issue, however, some community protection strategies may be designed more to manage public perceptions than to genuinely protect children. This raises concerns about the symbolic use of accountability in political and media discussions. Research highlights that politicians and media have a role in promoting a more progressive and inclusive agenda, challenging harmful narratives and supporting holistic responses that include rehabilitation and reintegration.⁶⁶

For example, community management strategies are a key component of post-release accountability. These include:

- surveillance and monitoring (e.g. parole conditions, electronic monitoring)
- support services to assist with reintegration into the community
- multi-disciplinary care for high-risk, high-needs offenders, including emotional regulation strategies
- technology, such as remote monitoring software, which has been found to be effective and even appreciated by some perpetrators as a way to demonstrate compliance and good behaviour.⁶⁷

Professionals also report that these types of strategies can reduce reoffending and act as a deterrent. Outside of the criminal justice system, the community plays a central role in perpetrator accountability. They can contribute to:

- preventing reoffending through social support and supervision
- fostering a culture of safety and responsibility
- challenging denial and minimisation of abuse.⁶⁸

A community-based approach ensures that accountability is not only punitive but also transformative, aiming to prevent future harm and support healing for all involved.⁶⁹

In reality, community attitudes towards perpetrator-focused prevention can be a barrier to the establishment or implementation of effective prevention programs. Societal distaste for perpetrators can lead to a desire for more punitive measures and more surveillance, however:

*'the effectiveness of monitoring and restriction mechanisms at the individual level is mixed. Sex offender registers have been found to be ineffective in that they do not reduce the commission of sexual or non-sexual crimes and because they can lead to societal disenfranchisement which can actually be more problematic.'*⁷⁰

Prevention of future offending

Most of our current prevention efforts involving perpetrators focuses on the prevention of future offending, to try and stop those who have been caught from reoffending. Rehabilitation of offenders is a core part of the current response to child sexual abuse in Queensland, Australia and internationally. For example, sentencing decisions are required to take into account a person's potential for rehabilitation. It also forms the focus of interventions while offenders are in prison and is required to be considered in parole decisions.

“

The sentencing of offenders involves an often complex task of applying the principles and purposes of sentencing to the characteristics of the offence and the subjective characteristics of the offender... The sentencing of child sex offenders is an important issue. This is in part because of the role sentencing plays in achieving some of the purposes of the criminal justice system – particularly punishment and deterrence.⁷¹

”

The available sentences for child sexual abuse offences under Queensland and Commonwealth criminal laws are broad. When considering the offences the following maximum sentences apply (as of 2025):

Table 3: Maximum sentences for child sexual abuse offences in Queensland

Offence	Maximum sentence of imprisonment
Grooming child under 16 years or parent or carer of child under 16 years (Criminal Code s218B)	5 years (10 years if the child is under the age of 12)
Making child exploitation material (Criminal Code s228B)	20 years (25 years if the offenders used a hidden network or anonymising service)
Distributing child exploitation material (Criminal Code s228C)	14 years (20 years if the offenders used a hidden network or anonymising service)
Possessing child exploitation material (s228D)	14 years (20 years if the offenders used a hidden network or anonymising service)
Indecent treatment of children under 16 (Criminal Code s210)	14 years (20 years if the child is under the age of 12 or has an impairment of the mind, is a lineal descendent of, or under the care or guardianship of the perpetrator)
Repeated sexual contact with a child (Criminal Code s229B)	Life imprisonment
Rape (Criminal Code s349)	Life imprisonment
Using a carriage service for child abuse material (Cth Criminal Code s473.22)	15 years

It is a general principle of law that the penalties available to be imposed, and the sentencing standards and considerations for the court to reach a decision on sentence, should be those which were available at the time the offence occurred. This was discussed in the Royal Commission into Institutional Responses to Child Sexual Abuse, which found that the ‘use of historical sentencing standards is particularly relevant to matters of institutional child sexual abuse, which are often prosecuted many years, even decades, after the offending occurred.’²⁰ Due to the trend towards more severe penalties for child sexual abuse offences in recent years, this practice sometimes results in the imposition of penalties which are less severe, distressing victim-survivors and running counter to community expectations.

As a result, the Royal Commission recommended that legislative amendments should be made so that courts must apply modern sentencing standards to child sexual abuse offences, but to ensure fairness to the accused, the maximum penalty available should be that which applied at the time of the offence.

The Queensland government tabled this recommendation for further consideration, noting consultation was required before any change to the sentencing regime in the *Penalties and Sentences Act 1992* (the Penalties Act) could be considered.²¹

The maximum penalty imposed on an offender is determined by the court with consideration given to previous similar cases. This encourages consistency in sentencing for similar behaviours, and proportionality in sentencing behaviours which are determined by the court to have different degrees of seriousness. The imposition of the maximum penalty is typically “reserved for the worst type of case” falling within the definition of a given offence in the legislation.²²

In 2012, Queensland introduced new sentencing to deal with repeat serious child sex offenders. Under part 9B of the Penalties Act, a perpetrator who is convicted for a ‘serious child sex offence’ as an adult, and who had previously been convicted for another serious child sex offence, is liable to imprisonment for life regardless of the maximum penalty otherwise available to a court. This ‘cannot be mitigated or varied under any law’.²³ This was intended to recognise that ‘that child sex offending is so heinous and presents such a risk to the safety of the community that the strongest legislative response is called for to ensure appropriate punishments are imposed’.²⁴

Besides imprisonment, courts have many options available to them in sentencing, depending upon the relative weight applied to the various purposes for which a sentence may be lawfully imposed. These purposes are articulated in section 9 of the Penalties Act:

- (a) punishment
- (b) rehabilitation
- (c) deterrence
- (d) denouncement
- (e) community protection
- (f) a combination of the above.

When sentencing a perpetrator for multiple offences (as in the offender’s case), most frequently a court will declare that sentences are to be served ‘concurrently’. This is particularly the case when the most serious offence (MSO) has a maximum or mandatory life sentence attached and the court determines to impose a sentence of life imprisonment as a head sentence.

Courts in Queensland and other jurisdictions apply the principle of totality when sentencing for multiple offences. This means that the sentence imposed for all the offences of which the accused is found guilty must be reasonable and proportionate; that is, sentencing is not simply a matter of applying the sentence on each conviction without regard to the others. This typically acts to reduce the total sentence imposed.

Courts can also specify a parole eligibility date at sentencing. This is most relevant for determining how long the person will effectively serve in prison. This non-parole period is frequently associated in public and media discourse as the ‘actual’ sentence imposed.

Parole

Parole is a form of supervised release from prison which may be granted before a term of imprisonment is completed. Parole may be court-ordered or parole-board-ordered. Court-ordered parole was introduced in Queensland in 2006 to increase the number of offenders who may be subject to supervised release in the community, and reduce the population of short-sentenced, low-risk prisoners in Queensland Corrective Services facilities.²⁵ Otherwise, the Parole Board of Queensland is responsible for considering and making decisions on applications by prisoners for parole. A prisoner who is released on parole may be returned to incarceration if they breach the conditions of their parole.

If released on parole a perpetrator sentenced to life imprisonment will remain under supervision for the rest of their life. Parole eligibility for life sentences is set automatically by section 181 of the *Corrective Services Act 2006*, however courts do have a discretion to impose a longer non-parole period if the circumstances demand it. A person sentenced for a serious violent or sexual offence must have parole eligibility date set by the court when it sentences them.²⁶

It is generally considered to be advantageous for parole to be granted (especially when life imprisonment has not been imposed), as this means the perpetrator is likely to spend more time in the community under supervision and management by law enforcement, which increases their chances of successful reintegration.²⁷

Typical sentencing outcomes

To accomplish the specified purpose of sentencing, a court is required to consider other options in sentencing before imprisonment, which is considered a 'last resort'.²⁸ This may include requiring a payment of a recognisance or other financial penalty, a term of probation, community service or an intensive correction order, or a term of imprisonment that is wholly or partially suspended.

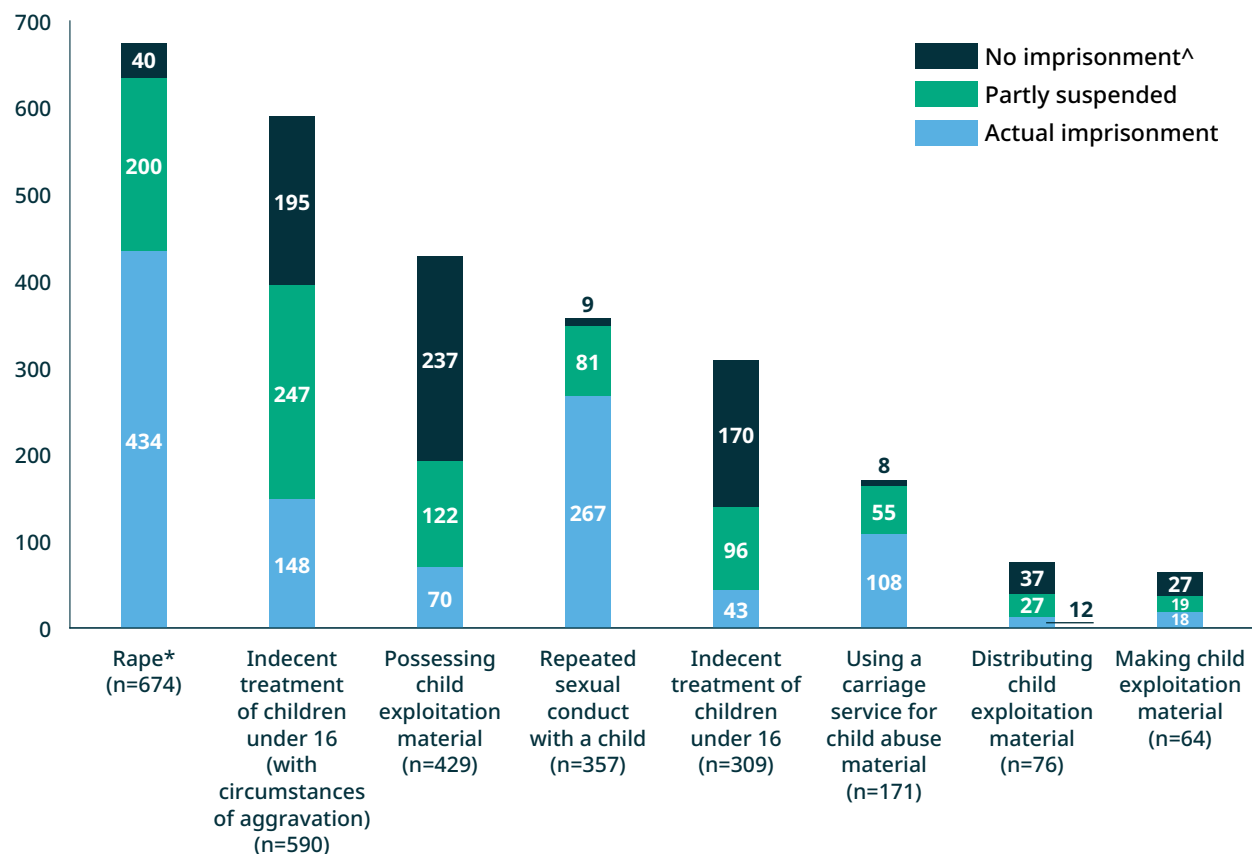
Most convicted perpetrators (72.9% of sentences) from 2019–20 to 2023–24 in Queensland received sentences that included actual imprisonment, even if some of the sentence was suspended. This included sentences for rape (94% of sentences where rape was the MSO),²⁹ repeated sexual conduct with a child (97.5%), using a carriage service for child abuse material (95.3%), indecent treatment with aggravation (66%), making (57.8%) and distributing CEM (51.3%). Indecent treatment without aggravation (45%) and possessing CEM (44.8%) were less likely to receive a sentence of actual imprisonment when these were the MSO. The number of sentences involving actual imprisonment, party suspended imprisonment, and no imprisonment, is set out in Figure 6 below.

Figure 6: Sentences for child sexual abuse offending by adults (2019–20 to 2023–24)

Source: Queensland Sentencing Advisory Council, Sentencing DataHub. Numbers represent the sentence imposed when the nominated offence was the 'most serious offence' (MSO)

* Includes adult and child victims

^Includes wholly suspended terms of imprisonment, intensive correction orders, probation, and other non-custodial penalties



The most common term of imprisonment (without suspension) handed down to perpetrators in the same period is set out in table 4:

Table 4: Most common term of imprisonment for child sexual abuse offences 2019–20 to 2023–24

Most serious offence (MSO)	Most common term of imprisonment (not suspended) imposed 2019–20 to 2023–24
Indecent treatment of children under 16 (n=43)	Less than 1 year (24)
Making child exploitation material (n=18)	Less than 1 year (9)
Possessing child exploitation material (n=70)	1 to 2 years (26)
Indecent treatment of children under 16 (with circumstances of aggravation) (n=148)	1 to 2 years (47)
Using a carriage service for child abuse material (n=108)	1 to 2 years (47)
Distributing child exploitation material (n=12)	3 to 4 years (5)
Rape (n=434)	6 to 7 years (73)
Repeated sexual conduct with a child (n=267)	9 to 10 years (43)

Over this period, four life sentences were handed down each for rape and repeated sexual conduct with a child. The offender's sentence is not included in this data as he was sentenced in late 2024.

Reforming the Serious Violent Offences Scheme in Queensland

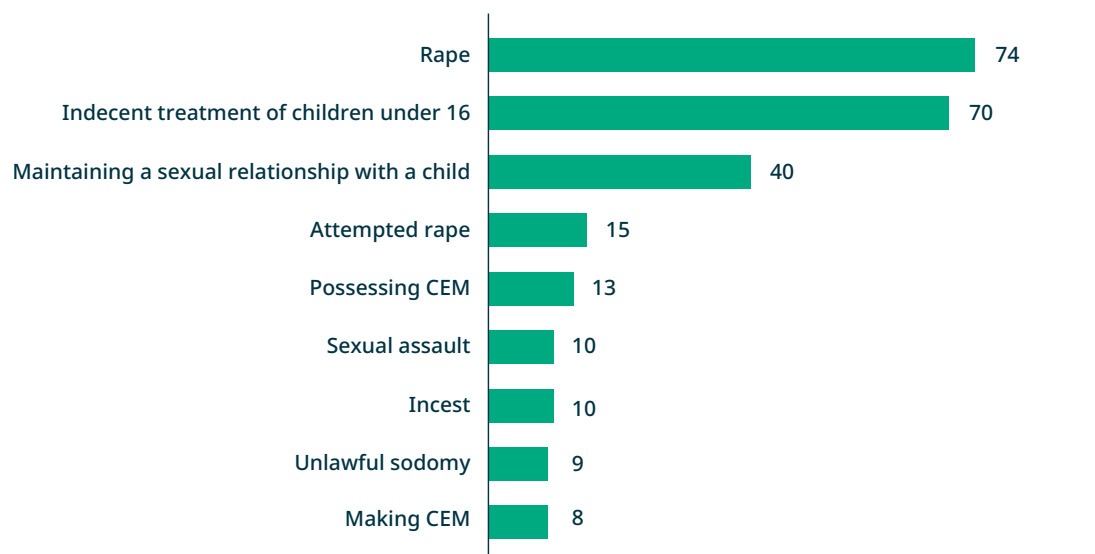
The Serious Violent Offences (SVO) scheme mandates that offenders declared under the scheme must serve at least 80 per cent of their sentence or 15 years (whichever is lesser) before becoming eligible for parole. This is mandatorily applied to listed offences with sentences of 10 years or more, and discretionarily to those between five and 10 years. The Queensland Sentencing Advisory Council's (QSAC) 2023 report *The 80 per cent Rule: The Serious Violent Offences Scheme in the Penalties and Sentences Act 1992 (Qld)* provides a comprehensive evaluation of the SVO scheme's effectiveness, fairness, and alignment with sentencing principles under the Penalties and Sentences Act.

In the nine years to 30 June 2020, 437 individuals were sentenced under the SVO scheme, with 72.8 per cent receiving mandatory declarations. Discretionary declarations were made in only 27.2 per cent of cases, despite the seriousness of most offences falling below the 10-year imprisonment threshold. The most common offences to attract an SVO declaration (mandatory or discretionary) were maintaining an unlawful sexual relationship with a child (n=91), and rape (n=71). Perpetrators sentenced for these offences under the SVO regime were the least likely to be granted parole (35.1% and 38.1% respectively).⁷²

The report identified that one in five cases of maintaining an unlawful sexual relationship with a child³⁰ was declared an SVO. As an MSO this offence was frequently tried alongside charges of rape, attempted rape, indecent treatment, and additional counts of maintaining an unlawful sexual relationship with a child. This indicates that such offending rarely occurs in isolation or in the absence of other types of violence.

Figure 7 over the page indicates the number and type of offences commonly associated with the maintaining offence when declared an SVO:

Figure 7: Offences most commonly associated with maintaining a sexual relationship with a child SVO (2011–12 to 2019–20)



In undertaking its review of the SVO scheme, QSAC identified several systemic issues with its operation. Judicial discretion was significantly constrained by the mandatory nature of the scheme, leading to inconsistent sentencing outcomes. In some cases, judges were observed to reduce head sentences to avoid triggering the mandatory declaration. Between 1997 and 2020, 17.9 per cent of SVO prisoners did not apply for parole, resulting in unsupervised release at the expiry of their sentence. Among those who did apply, parole was granted in 63 per cent of cases, compared to more than 80 per cent of non SVO prisoners over the same period.

Victim-survivor consultations revealed dissatisfaction with the scheme's discretionary application, particularly in cases involving serious harm where no declaration was made. Victims also expressed concern about the lack of post-release supervision, which they perceived as undermining community safety.

QSAC considered the application of the SVO scheme to child sexual abuse offences, highlighting both its symbolic and practical significance. Stakeholder submissions, particularly from advocacy organisations such as Knowmore, emphasised that victim-survivors often feel that sentencing outcomes do not adequately reflect the gravity and lifelong impact of the offending.

While the scheme's mandatory nature ensures that perpetrators serve a substantial portion of their sentence, it can paradoxically result in shorter head sentences when judges seek to avoid automatic declarations that limit parole discretion. This judicial workaround, reducing sentences to just below the 10-year threshold, can undermine the scheme's intent and diminish victim-survivor satisfaction.

Victim-survivors reported feeling let down when the seriousness of the offence was not reflected in either the sentence length or the time served. The report acknowledged these concerns and recommended a presumptive model that retains judicial discretion while ensuring that serious child sexual abuse offences are appropriately recognised through longer custodial periods and supervised release.

This approach aligns with broader community expectations, and the findings of the Royal Commission which advocated for sentencing practices that reflect contemporary standards and the enduring harm caused by such offences.

In response to the evolution of the SVO scheme and the limitations identified in the report, QSAC made 26 recommendations. These included replacing the current model with a presumptive declaration scheme for listed offences sentenced to over five years, allowing courts to set parole eligibility between 50 and 80 per cent of the sentence, and revising the list of applicable offences to expand beyond strictly "violent" offences, including (but not limited to):

- CEM offences (producing, distributing, and possessing)
- prostitution offences involving children as a circumstance of aggravation
- choking, suffocation or strangulation in a domestic setting.

QSAC also recommended renaming the scheme to the "Serious Offences Scheme" to better reflect the proposed scope change and ultimately found that the current SVO scheme is overly rigid, undermines judicial discretion, and fails to promote effective reintegration for offenders. The proposed reforms aim to create a more balanced, evidence-based, and victim-sensitive sentencing framework.

To date, the Queensland government has not formally responded to the QSAC report or its recommendations. In its recent report on sentencing for rape and sexual assault, QSAC recommended the government formally respond to and implement the recommendations previously made in the SVO scheme review.⁷³

Review of sentencing for Commonwealth child sex offences

The *Sexual Crimes Against Children and Community Protection Measures) Act 2020* (Cth) (SCAC Act) was introduced to address perceived inadequacies in the sentencing of child sex offenders under Commonwealth law, particularly with the sentencing of Commonwealth offences by State and Territory courts. The State and Territory courts are generally responsible for prosecuting and sentencing perpetrators of offences under Commonwealth criminal law, however the principle of consistency requires judges to maintain similar sentencing practices across jurisdictions.

The objectives of the SCAC Act included increasing custodial penalties to better reflect the gravity of offending, enhancing general and specific deterrence, and ensuring that community expectations are met. The Act introduced mandatory minimum sentences for the most serious offences and for recidivist offenders, established a presumption in favour of actual imprisonment and cumulative sentencing, and required courts to consider rehabilitation and the misuse of community standing as aggravating factors.

A recent *Statutory Review of Sentencing for Commonwealth Child Sex Offences* assessed the first three years of the SCAC Act's operation, from 23 June 2020 to 22 June 2023.³¹ It considered the operation and effectiveness of these provisions, their impact on sentencing outcomes, and whether further reform was warranted.

This review found that actual imprisonment remained the predominant sentencing outcome, imposed in 71.58 per cent of cases during the relevant timeframe. While the proportion of offenders receiving custodial sentences was slightly higher prior to the SCAC Act (74.36%) than after its commencement (69.96%), the average duration of imprisonment increased. The average total effective sentence rose from 2.75 years in 2020–21 to 3.5 years in 2022–23, while the average minimum custodial period increased from 1.5 to 2.1 years over the same period. These findings suggest a modest upward trend in sentencing severity following the legislative reforms.

Mandatory minimum penalties were applied in 11.4 per cent of cases during the review period. Their application increased over time, from 0 per cent in 2020–21 to 17.4 per cent in 2022–23. The review found that the introduction of mandatory minimums had a more pronounced effect on second strike offenders, whose average total effective sentence increased from 3 years (pre-SCAC Act) to 4.8 years (post-SCAC Act), and whose average minimum custodial period rose from 1.6 to 2.5 years. In contrast, first strike offenders experienced only marginal increases in sentence length, although the imposition of actual imprisonment became more consistent.

The SCAC Act sought to preserve incentives for guilty pleas by allowing sentence reductions of up to 25 per cent in mandatory minimum cases. The review found that guilty pleas remained prevalent, with 98.84 per cent of charges resulting in such pleas. Among offenders whose sentencing remarks specified a discount, 96.93 per cent received a reduction of 25 per cent or less. The average reduction was 24 per cent for a guilty plea and 9 per cent for cooperation with law enforcement. These findings indicate that the legislative reforms did not deter guilty pleas and may have contributed to procedural efficiency and reduced trauma for victim-survivors.

Rehabilitation is a key focus of the SCAC Act. Courts are required to consider an offender's prospects for rehabilitation and the availability of treatment programs. The review found a slight increase in pre-sentence rehabilitation participation since the introduction of the SCAC Act, from 38 per cent to 42.6 per cent. Post-sentence rehabilitation planning was more common, with 92 per cent of post-SCAC offenders indicating an intention to participate in treatment, compared to 85 per cent pre-SCAC. However, access to custodial rehabilitation programs remained inconsistent across jurisdictions, and eligibility is often limited to high-risk or long-term offenders.

The review noted that victim impact statements were referenced in only 7.67 per cent of sentencing remarks, and witnesses were mentioned in just 1.64 per cent of cases. This low level of victim-survivor engagement reflects the nature of Commonwealth child sex offences, which is discussed elsewhere in this report. Sentencing judges consistently acknowledged the serious harm caused by such offences and the broader societal impact of CEM.

The SCAC Act introduced a presumption in favour of actual imprisonment, unless there were “exceptional circumstances.” Courts retained discretion to release offenders immediately under recognisance release orders where exceptional circumstances were found. The review identified a range of factors considered exceptional by judges, including COVID-19-related hardships, rehabilitation prospects, and time served in pre-sentence custody. Among offenders who released on sentencing, the median duration of pre-sentence custody was six months for pre-SCAC cases and ten months for post-SCAC cases.

The review concluded that the SCAC Act had partially achieved its objectives, with early evidence of increased sentencing severity and consistency. However, it identified three areas where legislative amendment could enhance clarity and equity:

1. The sentence reduction for cooperation with law enforcement should be expanded to include assistance in relation to state and territory child sexual abuse offences.
2. The application of second strike mandatory minimum penalties should be limited to cases where the second offence was committed after the first offence was charged.
3. The presumption in favour of actual imprisonment should be extended to include state and territory sentencing options adopted under section 20AB of the Crimes Act 1914 (Cth).

This review highlighted the importance of maintaining judicial discretion in the sentencing of child sexual abuse offences, and emphasised the importance of enhancing access to rehabilitation and preserving procedural safeguards for victim-survivors and offenders as key areas to be improved.

The use of ‘good character’ evidence and an absence of victim impact statements

Historically, character evidence has been permitted in court to provide evidence that the behaviour a person has been convicted is ‘out of character’ for them, and weighs against a conviction or the imposition of a severe sentence. According to the Queensland Supreme Court benchbook:

*It is a matter for assessment in each case whether the evidence is relevant to either the Defendant's credibility or the unlikelihood of his having committed the offence in question or both.*⁷⁴

A recent review of sentencing for sexual assault and rape offences by QSAC, found that there were strongly conflicting views in the community and legal sector around the appropriateness of good character evidence for use in trials for offences involving sexual violence:

*The Council was told by victim survivor and advocacy groups' stakeholders that character references can be deeply distressing and retraumatising for victim survivors and undermine the sentencing purposes of denunciation. This stakeholder cohort was concerned that these references are accepted – seemingly without question – and appear to be given mitigating weight, despite the very serious nature of the offending involved.*⁷⁵

This is particularly relevant when considering the extent to which perpetrators of child sexual abuse may use grooming of other adults to create opportunities for abuse to occur and to avoid detection, including by presenting as credible, committed and outstanding members of the community. In this sense, the ‘good character’ displayed by a perpetrator was actually part of the offending, and should be understood in this way.

In its final report, QSAC recommended several changes to sentencing law and practice to respond to this, and other issues identified by victim-survivor advocates. This included:

- Creating a new aggravating factor for offences against children (who are nonetheless over the age of consent) to acknowledge the vulnerability of this cohort and the increased culpability of adult offenders in these circumstances.
- Exclude the consideration of good character evidence in the sentencing of an adult perpetrator for sexual offences, ‘unless such evidence is relevant to assessing the person's prospects of rehabilitation or risks of reoffending’.⁷⁶
- Review the victim impact statement (VIS) regime to ensure it is serving the best interests of victim-survivors, including prohibiting courts from drawing an inference that harm was not caused to a victim in the absence of a VIS.

In September 2025 the *Penalties and Sentences Act 1992* was amended...in particular implementing QSAC's recommendation to limit the use of good character evidence in the sentencing of sexual offences.⁷⁷

This intended to make the process of sentencing sexual offences more just and considerate of the experiences of victim-survivors, including children.

Reintegration and registration

When community integration is done with supervision, intervention and support it can increase community safety. However there are a range of individual and structural barriers that exist which can prevent successful community integration. These include:

- Self-motivation
- Social isolation
- Socio-economic disadvantage
- Cultural factors
- Labelling by the community and media.

While there has also been a focus on registration of offenders as a way to manage them in the community, and respond to community concerns, these can provide a false perception of safety. This is because they cannot protect the community from offenders who have not been caught and convicted for their offending. It is similarly important that the community does not develop a false sense of security about public sex offender registers, given the low rates of detection and conviction of perpetrators of child sexual abuse.⁷⁸

They can also act as a barrier to reintegration and undermine rehabilitation efforts, by increasing labelling.

Daniel's Law

On 27 August 2025, the *Community Protection and Public Child Sex Offender Register (Daniel's Law) Bill 2025* was tabled in Parliament by the Queensland government. The Bill is intended to create a publicly searchable child sex offender database, modelled on the registers established in Western Australia (WA) in 2012⁷⁹ and South Australia in 2024.⁸⁰

Funding of \$10 million was allocated in the 2024 State budget for the establishment of the scheme.⁸¹

The Queensland Attorney-General has described the planned register under Daniel's Law as a 'three-tiered system' which will:

- publish online particular information on reportable offenders who have failed to comply with their obligations
- implement an application-based system to identify high-risk offenders in a local area
- help parents to determine whether individuals who have unsupervised contact with their children are reportable offenders (a 'Community Protection Disclosure Scheme').⁸²

*Daniel's Law should be viewed as one component of a multi-faceted approach to preventing child sexual abuse. When integrated with offender monitoring, therapeutic support and interagency collaboration, controlled disclosure schemes can provide a pragmatic and ethical mechanism for reducing harm... A major challenge for Queensland is the need to ensure such schemes do not shift attention away from systemic issues like education, early intervention, and support services.*⁸³

Sexual Offender Treatment Programs

Sexual Offender Treatment Programs are tailored programs which can be delivered in prisons or the community. In Queensland, they are generally only accessible to people who are subject to Queensland Corrective Services orders, and they are not accessible to people on remand. Sexual Offender Treatment programs aim to equip offenders with the knowledge, skills, attitudes and self-belief they need to work towards a fulfilling life (offence free). Some of the topics covered include:

- engagement with the program (key component to reduce offending)
- self esteem
- criminogenic targets such as attitudes and cognitions; healthy relationships; and behavioural issues.⁸⁴

To increase effectiveness of the intervention, rehabilitation must be tailored to the individual needs and cultural context of the offender. Male sexual offender treatment programs are not suitable for female perpetrators of child sexual abuse, due to different motivators and behaviours.

There is also evidence to indicate that offenders who participate in treatment programs are less likely to reoffend.⁸⁵ Programs which focus on tailored treatment, which is supported by community reintegration, are likely to be the most effective.

Research conducted by the University of New South Wales has found that approximately one in six (15.1%) Australian men reported sexual feelings towards children. Around one in 10 (9.4%) Australian men has sexually offended against children, with half this group reporting sexual feelings towards children.⁸⁶

These are undetected offenders who have not come to the attention of authorities or the systems that meant to protect our children. Some of the men identified in the study expressed that they wanted help with their feelings towards children.

This type of work requires specialist training. Health professionals such as general practitioners and psychologists are unequipped to address a person's concerns about sexual thoughts and feelings towards children. Given the highly taboo nature of child sexual abuse, it is also unlikely that someone with sexual interest in children would discuss this in non-specialist therapeutic settings.

Preventative interventions and support for those who are concerned about their thoughts or feelings towards children are important.

International Case Study to Prevent Offending

Prevention Project Dunkelfeld (translation "dark field") was both a community awareness campaign and therapeutic support service for children and adults who self-identify as having a sexual attraction towards children. The public awareness component involved a public media campaign, with posters, radio and social media advertising a free and anonymous 24-hour helpline. The media campaign for this helpline adopted a non-judgmental approach, with the slogan "You are not guilty because of your sexual desire, but you are responsible for your sexual behaviour. There is help! Do not become an offender!" The helpline was run by clinically trained and experienced counselling support staff, to conduct screening to support referral into the therapeutic support component of the project.

The therapeutic support component provided, Berlin Dissexuality Therapy, delivered a tailored treatment program for people who were referred through the helpline, that aligned with the integrated theory of sexual offending. It adopted a group-based and multi-modal approach, including pharmacological and psychological intervention strategies. The program employed cognitive behavioural therapy, relapse prevention strategies, self-regulation and the Good Lives Model. The treatment program was delivered weekly for 45-50 three-hour sessions, lasting approximately 12 months. Although discussions about treatment of offenders is largely beyond the scope of this Report, this program was designed specifically for people who had not yet engaged in offending behaviour, as a secondary prevention strategy.

During the first 10-years of the project (i.e., 2005–15), an average 15–20 people contacted the helpline per month, resulting in more than 2,100 applications for the treatment program, 906 assessments for treatment and offers for treatment to 459 people.⁸⁷ However, early evaluation data indicated that people who had committed offences were also accessing the service, alongside those at risk of perpetration. Nonetheless, program data revealed that the treatment program had resulted in improved psychological functioning, with reductions in emotional deficits and pro-offending attitudes, and increased sexual self-regulation. In an offending sample of 53 participants, there was some evidence of a reduction in offending-related behaviours, though offending did persist for 29 of 32 users of CEM, highlighting the complexities of child sexual abuse and challenges of reducing further offending.⁸⁸ However, in a more recent study, Beier and colleagues (2024) reported that the content or nature and frequency of CEM offending had reduced among these participants.⁸⁹ This showcases the value of targeted community-based prevention strategies that should be implemented alongside broader primary prevention strategies for a comprehensive child sexual abuse prevention agenda.

The Royal Commission made several recommendations relating to creating child safe communities through prevention, including by focusing attention on perpetrators.⁹⁰ This included by ensuring that information and help-seeking services to support people who are concerned they may be at risk of sexually abusing children are available. The Royal Commission noted that the design of these services should be informed by Stop It Now! which is a model previously implemented in Ireland and the United Kingdom. It further recommended that there should be help seeking services for parents and other members of the community concerned that:

- an adult they know may be at risk of perpetrating child sexual abuse
- a child or young person they know may be at risk of sexual abuse or harm
- a child they know may be displaying harmful sexual behaviours.⁹¹

In seeking to deliver this recommendation, the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030 highlights that there is currently a lack of early intervention services for people who have a sexual interest in children, but that these services are necessary to prevent harm. Under the key theme of offender prevention and intervention, the National Strategy committed to strengthening law enforcement responses to child exploitation and victim identification for online child sexual abuse, legislative reforms to strengthen digital evidence gathering powers and to the launch of an offending prevention service for adults who have sexual thoughts about children or young people.⁹²

Stop It Now! Australia is an anonymous helpline and website run by Jesuit Social Services offering support to individuals concerned about their own or someone else's sexual thoughts or behaviours towards children. The program provides a non-judgemental and confidential space for people to seek help, aiming to prevent child sexual abuse by offering support and advice. The service is designed to be accessible to anyone affected by child sexual abuse, including concerned family members and professionals.⁹³

In submissions to the Board it was noted by Jesuit Social Services that:

Efforts by individual organisations and institutions to keep children safe cannot be disconnected from a broader societal context. A systemic, government-led effort is required, focussed on the positive and tangible actions that can be taken by individuals, groups and organisations to create communities that are safe for all children.

'Stop it Now! Australia' was commenced as a pilot program in September 2022, funded entirely from grants and philanthropic donations. Stop it Now! provides an anonymous helpline which men may call to talk about their concerns about sexual feelings towards children, or those of another person such as a friend or colleague. Jesuit Social Services modelled the program on similar successful perpetrator prevention programs in other jurisdictions such as the United Kingdom and United States (where it has been operating since 1992).

Stop it Now! also provides online, self-paced education modules in a program called 'Get Help! Australia' which provide resources to assist men understand and manage their behaviour in healthy ways. The two elements of the program help manage the risks of offending before harm occurs, in alignment with the Royal Commission recommendations.

Building on their experience delivering Stop It Now! and in response to 'an absence of secondary early intervention prevention services for children and young people', Jesuit Social Services established the Worried About Sex and Pornography Project (WASAPP), in collaboration with the University of Melbourne. This work led to the launch in August 2025 of a scoping study for a new service, *What's OK? Australia*, to support young people concerned about their own or someone else's sexual thoughts or behaviours, as well as parents, carers, and professionals who are worried about a young person's harmful sexual behaviour. Key features of the proposed service include an anonymous helpline and a dedicated website offering accessible resources and psychoeducation. The *What's OK?* website will launch in 2026, but additional funding is required to establish the anonymous helpline. Prevention programs like *What's OK?* will require government funding to ensure their longevity and effectiveness.

The Australian Government has recently confirmed funding for Jesuit Social Services to establish and deliver an expanded child sexual abuse prevention service, building on the Stop It Now! Australia pilot program. This funding fulfils commitments under the National Strategy and will establish Australia's first national, federally funded child sexual abuse offending prevention service. It is anticipated the National Offending Prevention Service (NOPS) will be launched in early 2026.

Since its commencement in September 2022, Stop It Now! Australia has received over 800 calls and live chats and had more than 45,000 people access its website. In the UK, Stop it Now! received over 11,000 calls for support and over 100,000 unique website viewers over a four-year period to 2018.⁹⁴ An evaluation of the success of this program, coupled with a nationally-televised and online public awareness campaign, suggested that 66 per cent of respondents had changed their behaviour as a result.⁹⁵ Frequently reported behavioural changes were stopping viewing CEM, engaging with help services, changing behaviour to avoid risky situations, and ceasing pornography use.

The efficacy of Stop it Now! is currently being evaluated; initial results indicate that it has been effective within the limited time it has been in operation.

However, the greatest risk to the success of programs such as Stop it Now! has always been resourcing and the ability to provide the services they offer to a broad cohort. In the First National Action Plan under the National Strategy, measure 21 committed to the delivery of an offending prevention service similar to Stop it Now!. The National Office for Child Safety, situated in the Attorney-General's Department, was responsible for procuring the NOPS, which has been allocated \$6.2 million over five years. A recent report by the Australian National Audit Office in June 2025 found that the procurement process had suffered 'significant delays', required further clarification before the tender could be accepted, and lapsed before these could be finalised.⁹⁶ In general, the tender process was found to not meet the Commonwealth Procurement Rules.

Operational Recommendation 16: Allocate funding and services to prevent and address behaviours that might lead to offending

Online and digital interventions are an increasingly important component of a comprehensive child sexual abuse prevention agenda, particularly given the rapid growth of online offending and digital perpetration.⁹⁷ Within primary and secondary prevention, strategies include the use of prevention messages (such as pop-up warnings) and chatbots, which aim to interrupt potentially harmful online behaviour and prevent escalation.⁹⁸ Public awareness campaigns and parent-focused education programs can complement these strategies by encouraging parents to implement protective measures on their children's devices, including content filtering and communication controls.⁹⁹

While many online interventions operate within tertiary prevention, responding to offending after it occurs, primary and secondary strategies play a critical role in deterrence and early intervention. Tertiary interventions include content blocking on web searches, web crawlers utilising artificial intelligence, facial recognition software, peer-to-peer network monitoring, and targeted online stings. Although essential, these strategies are beyond the scope of this report.

Digital prevention messages serve as both a deterrent and an educational tool. Pop-up warnings can appear when individuals search for illicit content or attempt to upload abusive material to cloud servers, delivering brief, targeted messaging that challenges attitudes, highlights the harms of abuse, warns of detection risks, or directs users to support services. Chatbots build on this approach by engaging users in anonymous, automated conversations at critical decision points. They can provide brief psychoeducation, encourage help-seeking, and connect individuals with therapeutic or helpline resources.

These strategies are designed to disrupt potential offending trajectories, promote help-seeking, and reduce opportunities for harm by intervening at key moments of online decision-making, reflecting a secondary prevention focus that targets both behaviour and environment. Once implemented, digital prevention measures can be highly cost-effective. However, their success depends on the cooperation of online service providers, internet providers, and governments. As many platforms are privately owned, prevention efforts can be inconsistent.

To address this, Australia and several other countries—including the UK, US, Canada, and New Zealand—have published the *Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse*, which outline guidance for technology companies to prevent the distribution of abusive material, block and filter illicit searches, address livestreaming and predatory behaviour, and adopt trauma-informed approaches for impacted children. These principles have been endorsed by major technology companies such as Google, Meta, and TikTok, many of which have already implemented measures such as pop-up warnings and educative messaging to reduce online offending.

The University of Sunshine Coast advised the Board that:

One notable example of an Australian online prevention strategy involved researchers deploying a web-based prevention messaging intervention where online pop-up messages were introduced to deter internet users from attempting to access "barely legal" pornography as a surrogate or gateway into accessing child sexual abuse material. ...This strategy targeted perpetration, while simultaneously targeting the moment of deciding whether to view child sexual abuse.

Despite these efforts, the online environment presents unique challenges. Digital platforms provide unprecedented anonymity and accessibility, lowering inhibitions and increasing the likelihood of harmful behaviour by individuals who may underestimate the risks of detection and consequences. Perpetrators use the internet to access illegal material, groom children, and connect with like-minded individuals who normalise and reinforce abusive behaviours and attitudes. Social media, gaming platforms, and encrypted messaging services can facilitate the sharing of illicit content, creating ongoing challenges for prevention and enforcement.

Operational Recommendation 16: Allocate funding and services to prevent and address behaviours that might lead to offending

That the Australian Government ensure ongoing funding and support for evidence based early intervention programs aimed at preventing child sexual abuse, particularly those that provide confidential support, public education, and guidance for adults concerned about their own thoughts or behaviours. Funding should be sufficient to enable expansion of outreach, maintain phone and online counselling services, and deliver consistent awareness campaigns.

This should include continued funding and support of the Stop it Now! Australia program, recognising its current role in preventing child sexual abuse through early intervention, public education, and confidential support for adults concerned about their own thoughts or behaviours.

Programs such as these help communities and individuals access preventative support before harm occurs and should be considered a core component of Queensland's child safeguarding strategy.

Children and young people who use harmful sexual behaviour

On some occasions, children may themselves commit sexual offences against another child. This behaviour is referred to as harmful sexual behaviour and includes behaviour outside the developmentally expected range. It may be exhibited due to past trauma, exposure to pornography and adult content or the child themselves experiencing sexual abuse. Children may not know that this behaviour is inappropriate, and specialised therapeutic support is often required. This is a complex issue which requires different interventions and responses. Given the nature of the offending in this case study, it has not been explored in depth by the Board as part of this Review.¹⁰⁰

Data from the Australian Child Maltreatment Study (ACMS) showed that although rates of reported child sexual abuse are declining overall, sexual offences committed by children against other children has increased. 13.2 per cent of 16 to 24-year-olds reported experiencing abuse as a child from another child whom they were not in a relationship with, while 5.7 per cent reported experiencing abuse from another child whom they were, or had previously been, in a relationship with.¹⁰¹

In 2022–23, girls aged 10 to 17 years made up the majority of female offenders proceeded against for child sexual abuse offences. This was mostly for the handling of unlawful sexual material offences (90%, n=237).¹⁰² A recent study found that the majority of CEM offences committed by females between 2012 and 2021 involved girls under 18. This 2024 study about women involved in online sexual exploitation stated that they appear to have a higher likelihood of engaging in CEM production offences than other CEM offences, though it was acknowledged that this may be driven by the number of children in the study cohort who had come to police attention for 'sexting', as they had taken or shared explicit photographs or videos of themselves.¹⁰³

The odds of 'perpetrating' a CEM offence were found to be 20 times higher for girls than for adult men or adult women, and 7.7 times greater than for boys. This was found to be likely due to the transition to online social and sexual interactions, and that a lot of the CEM concerning girls is 'self-generated' - meaning that they took the photo themselves - including under coercion by another party. The study also highlighted that a proportion of the CEM may have involved other children.¹⁰⁴

Engagement in this behaviour by children may:

- be part of contemporary, normalised sexual exploration
- be the result of peer pressure or harmful sexual behaviour exhibited by same or similar-aged partners or other children
- be the product of being groomed and coerced by an adult.¹⁰⁵

In either situation, responses outside of the criminal justice system for the child who has made the material is required. Education about healthy relationships and consent is paramount in addressing this issue, as well as targeting adults who seek to exploit and coerce children in this way. These children are themselves victims of child sexual abuse, regardless of whether they have 'self-generated' unlawful sexual material.

Victim-survivors of child sexual abuse should not be criminalised for their experience of abuse.

Bright Futures: National leadership in preventing harmful sexual behaviours

The Daniel Morcombe Foundation's Bright Futures program stands as a nationally recognised exemplar in the prevention of child sexual abuse and the mitigation of harmful sexual behaviours among children and young people. Operating across Australia, the program is designed to build the confidence, competence, and capability of professionals who work with children, equipping them to recognise, prevent, and respond to problematic sexual behaviours before they escalate.

Unlike traditional approaches that react to incidents after they occur, Bright Futures prioritises early identification and proactive intervention. By delivering evidence-based education, workshops, and forums to educators, frontline workers, and community professionals, the program fosters a culture of awareness and preparedness, ensuring that individuals who interact with children are not only alert to risks, but are empowered to act effectively. Its national reach, combined with a structured approach to professional development, positions Bright Futures as a benchmark for prevention programs both within Australia and internationally.

Central to the program's success is its comprehensive and multi-layered approach. Bright Futures provides tailored learning opportunities, including scenario-based workshops, webinars, and podcasts, all designed to translate complex safeguarding principles into actionable strategies. Professionals are trained to identify early indicators of harmful sexual behaviours, understand the nuances of online and technology-assisted exploitation, and engage with children and families in ways that prioritise safety, dignity, and empowerment. This focus on practical, applied learning ensures that the program delivers real-world impact beyond theory, equipping professionals with the tools they need to intervene effectively.

The program's alignment with current research and national frameworks enhances its credibility and effectiveness. Bright Futures integrates insights from child development science, criminology, and safeguarding practice, and reflects the principles underpinning the National Child Safe Standards. Its forums create opportunities for cross-sector collaboration, bringing together educators, child protection practitioners, law enforcement, and allied health professionals to share knowledge, discuss complex cases, and develop cohesive strategies. This cross-disciplinary approach not only amplifies the reach of prevention efforts, but also strengthens the broader child safeguarding ecosystem.

Moreover, *Bright Futures* exemplifies best practice in its use of technology and media to extend its impact. Through online webinars, podcasts, and resources, the program reaches professionals in regional and remote communities who might otherwise lack access to specialised training. This innovative use of digital platforms ensures equitable access to high-quality education and contributes to the program's status as a leading national initiative.

The program also reinforces the importance of community engagement in prevention. By fostering professional networks and encouraging ongoing dialogue, Bright Futures creates a sustainable culture of learning, reflection, and vigilance. Its success is evident not only in the high participation rates across jurisdictions, but also in the tangible improvements in professional confidence and competence reported by participants. These outcomes demonstrate that prevention programs grounded in practical training, collaboration, and evidence-based practice can effect meaningful change in safeguarding children.

Bright Futures is more than an education program; it is a national leader in the proactive prevention of child sexual abuse and harmful sexual behaviours. Its commitment to professional development, cross-sector collaboration, and evidence-based practice exemplifies what best practice in child safeguarding looks like. For Queensland and Australia more broadly, Bright Futures represents a critical investment in equipping the adults responsible for children with the knowledge, skills, and confidence to intervene early, prevent harm, and foster safe environments for all children.

Operational Recommendation 17: Investment in research on perpetrator prevention strategies and early intervention efforts

In its submission to the Board, Jesuit Social Services emphasised the importance of building a stronger evidence base about the perpetration of child sexual abuse:

High quality research into child sexual abuse perpetration, particularly by undetected, specialist offenders, is crucial to prevent, detect and deter child sexual abuse. To provide targeted prevention and intervention programs, and continue building child-safe organisations, institutions and communities, we must understand more about the extent of child sexual offending, pathways into perpetration, and characteristics of those who commit child sexual abuse.

This insight highlights a significant gap in the current knowledge base. While much of the existing research focuses on victim experiences and institutional failings, there is limited large-scale, contemporary research into perpetrator behaviours, motivations, and pathways. Without this understanding, policy responses risk remaining reactive rather than preventative.

Comprehensive research is essential to building an effective, prevention-focused response to child sexual abuse. A stronger evidence base will allow governments, service systems and communities to move beyond reactive approaches and towards strategies that anticipate and reduce risks before harm occurs.

Such research is critical to identifying behavioural patterns and risk indicators, including those associated with undetected perpetrators. By understanding how offending develops and manifests, systems will be better placed to recognise early warning signs and intervene before abuse takes place.

Research also plays a vital role in informing the design of prevention and intervention programs. Evidence-based insights enable the development of strategies that are targeted to specific contexts, populations and environments, ensuring that responses are both effective and proportionate to the risks faced.

Finally, comprehensive research strengthens child-safe practices across organisations, institutions and communities. By examining risk and protective factors in different settings, it provides the knowledge needed to reinforce safeguards, close gaps in practice, and build cultures that prioritise the safety and wellbeing of children.

Such research would enable Queensland to move beyond a reliance on retrospective case analysis, building a forward-looking approach to child protection and safeguarding that can reduce the likelihood of future harm.

Operational Recommendation 17: Investment in research on perpetrator prevention strategies and early intervention efforts

That the Queensland Government invest in a dedicated research program to inform targeted prevention strategies and early intervention efforts, along with the translation of research findings into key messages that can be shared with organisations, frontline workers and parents. This research should examine:

- the behaviours and attitudes of perpetrators of child sexual abuse
- risk and protective factors across different population groups, places and settings
- pathways into offending, including developmental, relational and situational factors
- the role of online environments and digital grooming in facilitating child sexual abuse
- the effectiveness of current community education and prevention campaigns in shaping public awareness and protective behaviour
- barriers that prevent children and families from recognising or disclosing sexual abuse
- the characteristics and impact of organisational environments that enable or deter abuse
- factors that support early identification and rehabilitation of individuals at risk of offending
- emerging trends and changes in the behaviours, conduct and prevalence of offending.

Chapter

25

Parents and guardians as partners in safeguarding

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Parents and guardians as partners in safeguarding

Parents as partners in safeguarding

Parents play a critical role in child safeguarding. Parents are constantly in services, can identify changes in a service's compliance and quality, interact with staff, and can observe changes in their children's behaviour towards the service. When services fail to inform parents about the safeguarding systems scaffolding children in ECEC, an important opportunity is lost for the systems that protect us to receive contemporaneous information regarding the operation of the service, identify early warning indicators and act swiftly to detect and respond to people who present a risk to children.

This Review has laid bare multiple instances of parents who held concerns about the offender's behaviour or incidents that occurred during his time at centres. They observed behaviours and conduct that they found to be unsettling, and they tried to raise the alarm to the centres that they entrusted the care of their children to.

Parents of victims who made submissions to the Board reflected a lack of understanding about the service operation and its legislative obligations, how to complain and who to complain to, which acted as a barrier to escalate concerns.

Parents also indicated they were concerned that complaining to a service would make their children a target for management. In some suburbs of Queensland, childcare spaces are limited and wait lists long, which restricts the choices parents have available to them.

“When I reported incidents over my years as a parent utilising different childcare centres, it was always an uncomfortable situation. I'd have to traipse around the centre looking for a senior employee, hesitant that my 'complaining' will make my children a target, speaking in emotional terms and being left with vague statement like 'I'll take care of it'.”

To allow parents to play an empowered role in the safeguarding of their children throughout their journey through the education and care system, it is important to understand what safeguarding looks like and who else is involved.








What is safeguarding?

Child safeguarding refers to the proactive implementation of mechanisms and actions taken by organisations to promote and protect the safety and wellbeing of children and prevent harm. To be effective, actions must be embedded into institutional practices which are clear about how the organisation responds to risk and harm. Responsibility for safeguarding practices sits with the organisation, its leadership and its workers.

Child safeguarding practices seek to create an environment where harm does not occur. They require us to think broadly about how to protect children from harm within our institutions.

While child protection is part of safeguarding, it is primarily reactive and focuses on protecting individual children who have experienced or are at risk of experiencing significant harm, particularly from parents or caregivers.

Partners in safeguarding children in ECEC services

	Regulator	ECRA is responsible for regulating early childhood education and care services which includes receiving and investigating complaints from parents.
	Funding body	The Australian Department of Education provides the child care subsidy and approves services to be able to claim the subsidy. The service must maintain a standard of quality to remain eligible for this funding.
	Business owner	The approved provider of the service is responsible for ensuring their childcare centre complies with the law and regulations. This includes the duty to notify the regulatory authority of matters occurring within the service including allegations of child sexual abuse occurring in the service.
	Service level management	The Nominated Supervisor or other staff member placed in day-to-day charge of the service manages the day-to-day operation of the service.
	Service staff	Educators work directly with children both in their room and across the service.
	Consumers	Just as parents and guardians are partners in safeguarding their own children, so too are they partners in safeguarding all the children in services in which they attend. By sharing information and staying alert, parents and guardians can be a powerful part of the safeguarding system.
	Blue Card Services	Blue Card Services is responsible for conducting and maintaining working with children checks.
	Police	Police are always partners in safeguarding regardless of the sector

From 1 July 2026, the Queensland Family and Child Commission will join as a partner in safeguarding, accepting notifications of concerns and allegations of reportable conduct. While the examples provided are specific to the ECEC sector, many of these categories are likely to apply across other child serving organisations.

What to look for in an early education and care service

Who is in charge?

The name of the approved provider and all the nominated supervisors for the service must be displayed in a position clearly visible from the entrance.¹⁰⁶

Approved providers and nominated supervisors are in charge of the operation of an ECEC service. The Nominated Supervisor is generally in day-to-day charge of the service and is a good place to start with any questions about the service's operation and the communication of concerns or grievances. They are ultimately responsible for the service's compliance with the legislation.

Are the service and its staff compliant with the National Law and National Regulations?

For information regarding the service's history of compliance, parents and caregivers can ask to see the service's record of compliance which must be provided to any person upon request.¹⁰⁷

This record of compliance will not include information about the conduct of a nominated supervisor or staff nor does ECRA publish compliance action naming individuals.

If the service has a compliance history, the following questions are useful to ask:

- When were the breaches confirmed?
- What were the breaches?
- What was the statutory action?
- What was the service required to do to reestablish compliance?

What are the different compliance tools?

A full list of the available compliance tools is available in ACECQA's Guide to the NQF.¹⁰⁸ They range from low level administrative action to higher level statutory action such as prosecution and license cancellation. While the National Law allows for the issuing of infringement notices, ECRA has made the policy decision not to issue infringement notices.

Serious compliance action taken in relation to a service or approved provider is published by ECRA.¹⁰⁹ If the compliance concerns regarding an individual reach the level of a prohibition, then the individual will no longer be able to work in a service and Blue Card Services will be notified and their eligibility to continue to hold the card may be affected.¹¹⁰

What other factors relating to the approved provider are worth considering?

The size of the approved provider, whether they are for profit and how many services they hold may have an impact on outcomes at the service.

Approved providers can range from an individual with one service approval to large corporations with shareholders and services across Australia.

Regardless of the size of organisation parents should identify who to lodge grievances with. This person may be at the service or in the case of larger providers in a central location. The policies and procedures of the service are likely to contain this information.

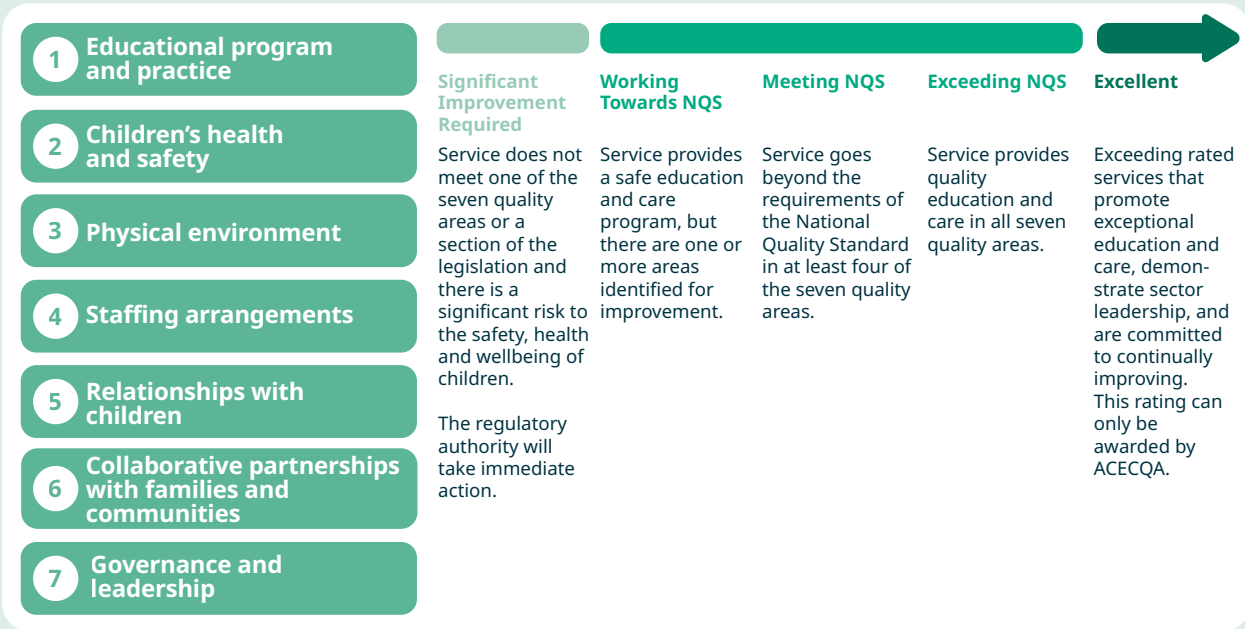
Information regarding approved providers and the number of services they hold can be obtained from the ACECQA National Registers (www.acecqa.gov.au/resources/national-registers).

Information about the compliance history of approved provider is published by ECRA. As this only relates to statutory compliance action taken against providers in Queensland, national providers may also have been subject to compliance actions in other states. Information regarding statutory compliance action in other jurisdictions can be obtained from the relevant jurisdictional regulatory authorities (www.acecqa.gov.au/help/contact-your-regulatory-authority).

What is the service’s rating against the National Quality Standards (NQS) and when was it assessed?

The quality rating must be displayed in a position clearly visible from the service entrance.¹¹¹ This is the regulatory authority’s assessment of how the service is meeting the standards. Services can be rated Excellent, Exceeding NQS, Meeting NQS, Working Towards NQS and Significant Improvement Required.

Figure 8: The Quality rating criteria



A copy of all the Elements and Standards is available on the ACECQA website.¹¹² Certain standards and elements will give greater insight to the service’s safeguarding practices than others. For example:

- 2.1 Health - Each child’s health and physical activity is supported and promoted and
- 3.1 Design - The design of the facilities is appropriate for the operation of a service.

From 1 January 2026, refinements to the NQS will commence to sharpen the focus on child safety and explicitly reference child safety within Quality Areas 2 and 7 in response to ACECQA’s Review of Child Safety Arrangements under the National Quality Framework. While the assessment and rating process allows parents to compare services against established standards and target those areas of greatest concern, the date of the assessment must be considered. A service’s rating may not be the best indicator of the service’s current operation with up to 7 years between full rating assessments.

In August 2025, following the Education Ministers Meeting, the Australian Government announced that it was investing up to \$189 million to strengthen safety and quality in ECEC settings. This investment includes funding to support state and territory regulatory authorities to ensure that all services are assessed on average every three years.

Concerns regarding the National Quality Framework and child safeguarding assurance

While the National Quality Framework (NQF) establishes an important baseline for quality in early childhood education and care (ECEC), it has not effectively informed parents about safety threats within services. Families generally assume that NQF licensing guarantees that a service is safe for children, yet the current assessment and rating process does not meaningfully examine how risks of abuse, grooming or exploitation are managed. As a result, parents are often unaware of weaknesses in a service's child protection culture, screening practices, or incident-response systems.

The National Quality Framework (NQF) must do more to embed the National Principles for Child Safe Organisations (or the ten Child Safe Standards) within its regulatory expectations and assessment tools. At present, the standards relating to children's health, safety and wellbeing (Quality Area 2) focus primarily on physical safety and supervision rather than organisational safeguarding systems. The NQF should evolve to include a structured assessment of how each provider prevents, detects, and responds to child abuse, including the robustness of staff screening, induction, reporting processes, and child participation mechanisms. Embedding the ten Child Safe Standards would ensure that ECEC providers are not only compliant with quality indicators but demonstrably safe environments. It would also strengthen public confidence by ensuring that accreditation outcomes genuinely reflect a provider's capability to protect children from harm — not just to deliver quality learning experiences.

What is the service's reflection on its quality and what plans for improvement does it have?

Services must have a quality improvement plan (QIP).¹¹³

The QIP is a document created by an approved provider to help services self-assess their performance in delivering quality education and care and to plan future improvements. Current and prospective parents can ask to see this document, and it must be provided upon request.¹¹⁴

As with the assessment and rating outcomes, when reviewing this document, one can target the areas of greatest concern.

What is the service's philosophy?

The service must prepare a statement of philosophy as part of its QIP which is designed to guide all aspects of the service's operations. Services which are proactive and informed regarding safeguarding are likely to reference their approach in their philosophy.

As the philosophy forms part of the QIP, it must be provided to prospective and current parents and guardians upon request.¹¹⁵

What are some workforce and service factors that can be considered?

Outside of the documents prepared by the service, information can be obtained by asking the service about:

- Continuity of staff and staff qualifications. While some services display images of staff identifying their qualifications and length of service this is not a requirement under the NQF. This means you may need to ask about these details.
- Usage of agency staff and induction of agency staff. While this issue may be canvassed in the services staffing policy, the NQF does not require the staffing policy to address this issue. You may wish to enquire with the service regarding its policy with respect to agency staff and if they do use agency staff, what due diligence does the service undertake to ensure the staff are suitable and aware of the service's policies and procedures?
- Induction and ongoing professional development for staff.
- What is the service's approach to induction of its staff? How does it ensure that its staff understand how the service operates before they provide education and care to children? What steps does the service take to ensure that its staff remain aware of contemporary best practice?

- How staffing is managed and who will be looking after your children on a given day? There is no prescribed way in which this information must be communicated. Ask the service how they communicate this information.
- How the staff interact with the children. Are they respectful and appropriate?
- Whether the ratios are being maintained. While this is sometimes a complicated calculation based on the ages of children, this is something that parents and guardians can easily observe.
- Room groupings – what are the ages of the children in your child's class and how does the service manage the periods at the beginning and end of the day when the number of children in attendance is lower?
- Does the service have any conditions on its service approval and what is the effect of those conditions? Any conditions on the service will be recorded on the service approval. This is clearly visible to anyone from the main entrance of the service.¹¹⁶

What is the service's physical environment like?

The service environment and the extent to which it is designed to facilitate supervision is considered as part of the licencing process before the service approval is granted.

ECRA has an ongoing role in monitoring the physical environment at the service and ensuring it continues to comply with the regulations.

Questions parents may ask themselves or the service about the environment include:

- How is the furniture arranged?
- Is there information or art hanging on the windows which affects the line of sight for supervision?
- What is the connection between the indoor and outdoor environments? Is there clear visibility between the two?
- Do the nappy change areas and toileting areas balance the dignity of the children with the need to ensure that they are safe?
- Where do the children sleep, and can they be adequately supervised while sleeping?

What are the policies and procedures that underpin the operation of the service?

The NQF requires services to have a prescribed list of policies and procedures such as providing a child safe environment, staffing and dealing with complaints.¹¹⁷ ACECQA, in consultation with state and territory regulatory authorities, has developed guidelines to help providers prepare these policies and procedures.

The adequacy of these documents is considered by ECRA as part of the service approval process.¹¹⁸

Parents and guardians of prospective and current enrolled children have a right to access these documents at any time.¹¹⁹

Some of these policies may provide more information regarding the service's approach to safeguarding than others including those relating to:

- Complaints
- Staffing, including whether staff members ever work alone with children
- Governance and management
- Health and safety, including sleep and rest.

How does the educational program support a culture of safeguarding?

The ECEC curriculum embraces ideas such as children developing a strong sense of wellbeing and the development of secure, respectful and reciprocal relationships with educators.¹²⁰ Questions can be asked of the service regarding how they interpret this element and how developmentally appropriate safeguarding is incorporated into the programming.

Some services choose to engage with safeguarding specialists such as Bravehearts to provide training to educators, parents or children.

How can parents and guardians be involved in shaping practice in a service?

Services which are meeting the NQS should be supporting families to be involved in the service and to contribute to service decisions.¹²¹

Every service has a different approach to this. Many services now rely on sector specific online platforms to engage with parents. Their platforms allow services to share photos, videos, and documents related to children's care and learning and generally allow two-way communication.

Parents and guardians should ask the approved provider or person in day-to-day charge about opportunities to contribute.

Table 5: Who should parents and guardians contact:

About your child on any given day	The lead educator in your child's room
About the day-to-day operations of the service	The service's nominated supervisor or the person nominated as the responsible person at any given time. The name and position of the responsible person in charge of the service must be displayed and clearly visible to anyone from the main entrance. ¹²²
If you have a complaint about something that has occurred at the service (excluding complaints alleging sexual or physical abuse)	<p>Review the service policy and procedures on dealing with complaints and follow the procedure. The service must provide this to you upon request.</p> <p>If you are concerned about the quality or compliance of an ECEC service, you may make a complaint to ECRA. A complaint form is available on its website (www.earlychildhood.qld.gov.au).</p>
If you are concerned that your child may have experienced physical or sexual abuse while in the service	<p>Follow the complaints policy as outlined above. If you communicate your concerns to the approved provider, they are required to notify ECRA within 24 hours.</p> <p>Contact ECRA directly by lodging a complaint through its website or by contacting your local regional office, the details for which are available of the ECRA website (www.earlychildhood.qld.gov.au). ECRA will notify the QPS of these allegations.</p> <p>Contact QPS directly.</p> <p>From 1 July 2026, concerns regarding conduct at ECEC services can also be referred directly to the Queensland Family and Child Commission as the agency responsible for administering Queensland's Reportable Conduct Scheme.</p> <p>If the system works as intended all parties will become aware of your allegations regardless of which organisation you contact first.</p>

Endnotes

- 1 S Price, D Mortiz, L Dodds, D Mitchell, *Preventing Child Sexual Abuse* [research report], Sexual Violence Research and Prevention Unit, University of the Sunshine Coast, 2025, p 3.
- 2 Australian Productivity Commission. *Delivering Quality Care More Efficiently: Interim Report*. August 2025. Productivity Commission, Australian Government.
- 3 National Centre for Action on Child Sexual Abuse “*A Holistic Approach to Preventing Child Sexual Abuse*” National Centre, 2023
- 4 B Matthews and H Do, *Prevalence of child sexual abuse in Queensland: Results from the Australian Child Maltreatment Study* [research report], Queensland University of Technology, Brisbane, 2025.
- 5 Price et al., *Preventing Child Sexual Abuse*.
- 6 Price et al., *Preventing Child Sexual Abuse*.
- 7 Price et al., *Preventing Child Sexual Abuse*.
- 8 Price et al., *Preventing Child Sexual Abuse*.
- 9 Price et al., *Preventing Child Sexual Abuse*.
- 10 Price et al., *Preventing Child Sexual Abuse*.
- 11 S Smallbone, WL Marshall, and R Wortley, R, *Preventing child sexual abuse: evidence, policy and practice*, Willan Publishing, 2008.
- 12 Smallbone et al., *Preventing child sexual abuse: evidence, policy and practice*.
- 13 S Smallbone, and S Rayment-McHugh, ‘Sexual crimes’, in N Tilley and A Sidebottom (eds), *Handbook of Crime Prevention and Community Safety*, Routledge, 2019.
- 14 D Harris, J Ogilvie, B Jenkins, A Bodker, L Buzza, *Best practices for prevention of institutional child sexual abuse and exploitation* [research report], Griffith University, Brisbane, 2025.
- 15 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 16 National Office for Child Safety, ‘*National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*’, Australian Government, 2021
- 17 Department of Child Safety, Youth and Women, ‘*Prevent. Support. Believe. Queensland’s framework to address sexual violence*’, Queensland Government, 2021.
- 18 E-kidna Group, *Advocacy for communities - Stand together for change*, 2023, accessed 16 September 2025.
- 19 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 20 L Wall, R Moody, L Kling, T Pappu, S Rattambige, P Bosher, *Safeguarding children from child sexual abuse* [research report], Australian Institute of Family Studies (Australian Government), Melbourne, 2025, p41.
- 21 Commission of Inquiry into the Tasmanian Government’s Responses to Child Sexual Abuse in Institutional Settings, ‘*Witness statement of Professor Kerryann Walsh, Tasmanian Government*’, 2023.
- 22 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 23 Commission of Inquiry into the Tasmanian Government’s Responses to Child Sexual Abuse in Institutional Settings, ‘*Who was looking after me? Prioritising the safety of Tasmanian children*’, Tasmanian Government, 2023.
- 24 S Trew, D Russell, Professor D Higgins and Professor K Walsh, *Effective delivery methods and teaching strategies for child sexual abuse prevention education: A systematic review*. Institute of Child Protection Studies, Australian Catholic University, 2021.
- 25 Price et al., *Preventing Child Sexual Abuse*.
- 26 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 27 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 28 J Gubbels, C van der Put, G Stams, M Assink, ‘Effective Components of School-Based Prevention Programs for Child Abuse: A Meta-Analytic Review’, *Clinical Child and Family Psychology Review*, 2021, 24:553–578.
- 29 Price et al., *Preventing Child Sexual Abuse*.
- 30 Commissioner M Byrne QC, *Queensland Organised Crime Commission of Inquiry*, Queensland Organised Crime Commission of Inquiry, State of Queensland, 2015.
- 31 Price et al., *Preventing Child Sexual Abuse*.
- 32 Price et al., *Preventing Child Sexual Abuse*.
- 33 Price et al., *Preventing Child Sexual Abuse*.
- 34 Price et al., *Preventing Child Sexual Abuse*.
- 35 H Kaçan, H Sakız, ‘Empowering parents of children with disabilities: Assessing the impact of a child sexual abuse psychoeducation program in Türkiye’, *International Journal of Developmental Disabilities* 2024, 1(15), <https://doi.org/10.1080/20473869.2024.2368934>.
- 36 J Rudolph, M Zimmer-Gembeck, D Shanley, R Hawkins, R, ‘Child sexual abuse prevention opportunities: Parenting, programs, and the reduction of risk’, *Child Maltreatment* 2017, 23(1), 96-106: <https://doi.org/10.1177/1077559517729479>.
- 37 J Rudolph, M Zimmer-Gembeck, ‘*Reviewing the focus: A Summary and critique of child-focused sexual abuse prevention*’, *Trauma, Violence & Abuse* 2018, 19(5): 543–554, <https://doi.org/10.1177/1524838016675478>.
- 38 Price et al., *Preventing Child Sexual Abuse*.
- 39 Price et al., *Preventing Child Sexual Abuse*.
- 40 Price et al., *Preventing Child Sexual Abuse*.
- 41 Price et al., *Preventing Child Sexual Abuse*.
- 42 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 43 Tanya Crooks, Executive Director, Lutheran Education Queensland
- 44 Tanya Crooks, Executive Director, Lutheran Education Queensland
- 45 Price et al., *Preventing Child Sexual Abuse*.
- 46 Price et al., *Preventing Child Sexual Abuse*.
- 47 Price et al., *Preventing Child Sexual Abuse*.
- 48 Price et al., *Preventing Child Sexual Abuse*.

- 49 Childlight (East Asia and Pacific Hub) & Gendered Violence Research Network International *Best Practice for Protecting Children from Child Sexual Abuse – Project 3: Identifying Perpetrators and Children at Risk* [research report], University of New South Wales, Sydney, 2025.
- 50 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 51 Wall et al., *Safeguarding children from child sexual abuse*.
- 52 ACECQA, *Review of Child Safety Arrangements under the National Quality Framework (Child Safety Review)*, Australian Government, 25 June 2025.
- 53 *Education and Care Services National Law (Queensland)*, s263.
- 54 Wall et al., *Safeguarding children from child sexual abuse*.
- 55 Wall et al., *Safeguarding children from child sexual abuse*.
- 56 Education and Care Services National Regulations, reg 299C
- 57 Harris et al., *Best practices for prevention of institutional child sexual abuse and exploitation*.
- 58 Price et al., *Preventing Child Sexual Abuse*.
- 59 Australian Human Rights Commission (AHRC), *National Principles for Child Safe Organisations*, Australian Government, 2018.
- 60 AHRC, *National Principles for Child Safe Organisations*.
- 61 D Harris, J Ogilvie, B Jenkins, A Bodker, L Buzza, *Best practices for prevention of institutional child sexual abuse and exploitation* [research report], Griffith University, Brisbane, 2025.
- 62 Price et al., *Preventing Child Sexual Abuse*.
- 63 Price et al., *Preventing Child Sexual Abuse*.
- 64 Price et al., *Preventing Child Sexual Abuse*.
- 65 Price et al., *Preventing Child Sexual Abuse*.
- 66 Price et al., *Preventing Child Sexual Abuse*.
- 67 Price et al., *Preventing Child Sexual Abuse*.
- 68 Price et al., *Preventing Child Sexual Abuse*.
- 69 Price et al., *Preventing Child Sexual Abuse*.
- 70 Wall et al., *Safeguarding children from child sexual abuse*.
- 71 Commonwealth of Australia, *Final Report: Royal Commission into Institutional Responses to Child Sexual Abuse*, Australian Government, 2017.
- 72 Queensland Sentencing Advisory Council, *The '80 per cent Rule': The Serious Violent Offences Scheme in the Penalties and Sentences Act 1992 (Qld)*, Queensland Government, May 2022.
- 73 Queensland Sentencing Advisory Council (QSAC), *Sentencing of sexual assault and rape: The Ripple Effect*, Queensland Government, 2024.
- 74 Queensland Courts Services, *Supreme and District Courts Benchbook 42 Good Character/Bad Character*, Queensland Government, April 2025.
- 75 QSAC, *Sentencing of sexual assault and rape: The Ripple Effect*.
- 76 QSAC, *Sentencing of sexual assault and rape: The Ripple Effect*.
- 77 *Penalties and Sentences (Sexual Offences) and Other Legislation Amendment Act 2025 s9*.
- 78 Parliamentary Joint Committee on Law Enforcement, *Law enforcement capabilities in relation to child exploitation*, Parliament of Australia, 2023, chapter 6.
- 79 See *Community Protection (Offender Reporting) Act 2004 (WA)*.
- 80 See *Child Sex Offenders Registration (Public Register) Amendment Act 2024 (SA)*.
- 81 Queensland Treasury, *Budget Paper 4: Expense Measures 2025–26*, Queensland Government.
- 82 D Frecklington, *LNP announces Public Child Sex Offender Register* [media release], 9 September 2024.
- 83 C Ronken, *Submission to the Justice, Integrity and Community Safety Committee*, Bravehearts, 2025.
- 84 WL Marshall, LE Marshall, GA Serran and MD O'Brien. *Rehabilitating Sexual Offenders: A Strength-Based Approach*. American Psychological Association, 2011. <http://www.jstor.org/stable/j.ctv1chr0v>.
- 85 Price et al., *Preventing Child Sexual Abuse*.
- 86 Childlight, *Identifying Perpetrators and Children at Risk*.
- 87 K Beier, 'Proactive strategies to prevent child sexual abuse and the use of child abuse images: The German Dunkelfeld-Project for adults (PPD) and juveniles (PPJ)', *Sexual Violence: Evidence Based Policy and Prevention* 2016, 249–272, https://doi.org/10.1007/978-3-319-44504-5_14.
- 88 Beier, Proactive strategies to prevent child sexual abuse and the use of child abuse images.
- 89 KM Beier, J Nentzl, M von Heyden, M Fishere, and T Amelung, *Preventing Child Sexual Abuse and the Use of Child Sexual Abuse Materials: Following up on the German Prevention Project Dunkelfeld*. *Journal of Prevention* (2022), 2024, 45(6), 881–900. <https://doi.org/10.1007/s10935-024-00792-0>
- 90 Commonwealth of Australia, *Final Report: Royal Commission into Institutional Responses to Child Sexual Abuse*.
- 91 Commonwealth of Australia, *Final Report: Royal Commission into Institutional Responses to Child Sexual Abuse*.
- 92 Commonwealth of Australia, *Final Report: Royal Commission into Institutional Responses to Child Sexual Abuse*.
- 93 Jesuit Social Services, *Stop It Now! Australia*, Jesuit Social Services, 2025, accessed 16 September 2025.
- 94 E Newman, E Efthymiadou, E Quayle, T Squire, D Denis, R Wortley, K Beier, N Koukopoulos, 'The Impact of a Public Health Campaign to Deter Viewing of Child Sexual Abuse Images Online: A Case Study of the UK Stop It Now! Campaign', *Sexual Abuse* 36(6): 635–661, <https://doi.org/10.1177/10790632231205784>.
- 95 E Newman, E Efthymiadou, E Quayle, T Squire, D Denis, R Wortley, K Beier, N Koukopoulos, 'The Impact of a Public Health Campaign to Deter Viewing of Child Sexual Abuse Images Online: A Case Study of the UK Stop It Now! Campaign', *Sexual Abuse* 36(6): 635–661, <https://doi.org/10.1177/10790632231205784>.
- 96 Australian National Audit Office, *Conduct of Procurements Relating to Two New Child Sexual Abuse-related National Services*, Auditor-General Report No. 44 of 2024–25, Australian Government, 18 June 2025.
- 97 S Price, N McKillop, J Scanlan, S Rayment-McHugh, L Christensen, J Prichard, 'A Review of Digital Interventions as Secondary Prevention Measures to Combat Online Child Sexual Abuse Perpetration', *Journal of Child Sexual Abuse*, 33(7): 869–890, <https://doi.org/10.1080/10538712.2024.2415549>.

- 98 J Prichard, J Scanlan, P Watters, R Wortley, C Hunn, E Garrett, *Online messages to reduce users' engagement with child sexual abuse material*, University of Tasmania, 2022.
- 99 eSafety, *Mind the Gap: Parental awareness of children's exposure to risks online*, Australian Government, February 2022.
- 100 Sexual Assault Support Service, *About harmful sexual behaviour*, 15 December 2023.
- 101 B Mathews, D Finkelhor, R Pacella, J Scott, D Higgins, F Meinck, H Erskine, H Thomas, D Lawrence, E Malacova, D Haslam, D Collin-Vézina, 'Child sexual abuse by different classes and types of perpetrator: Prevalence and trends from an Australian national survey', *Child Abuse & Neglect* 2024, 147:106562, <https://doi.org/10.1016/j.chiabu.2023.106562>.
- 102 Queensland Sentencing Advisory Council (QSAC), *Sentencing DataHub* [data], Queensland Government, 2025.
- 103 I Hull, L Christensen, N McKillop, S Rayment-McHugh, 'Females' engagement in offline and online sexual offending and their interactions with the criminal justice system: A gender and age comparison', *Journal of Interpersonal Violence* November 2025, 40, <https://doi.org/10.1177/08862605241299445>
- 104 Hull et al., 'Females' engagement in offline and online sexual offending and their interactions with the criminal justice system: A gender and age comparison'.
- 105 ThinkUKnow, *Self-generated child abuse material*, Australian Government (Australian Federal Police), n.d.
- 106 *Education and Care Services National Law (Queensland)* s172.
- 107 Education and Care Services National Regulations reg 177(3)(b).
- 108 Australian Children's Education and Care Quality Authority, '*National Quality Framework*', Australian Government, 2025, accessed 12 September 2025.
- 109 Department of Education, '*Register of published enforcement actions*', Queensland Government, 2025, accessed 12 August 2025.
- 110 *Education and Care Services National Law (Queensland)*, s1.
- 111 *Education and Care Services National Law (Queensland)*, s172.
- 112 Australian Children's Education and Care Quality Authority, '*ACECQA*', Australian Government, 2025, accessed 12 September 2025.
- 113 Education and Care Services National Regulations reg 55.
- 114 Education and Care Services National Regulations reg 31.
- 115 Education and Care Services National Regulations reg 31.
- 116 *Education and Care Services National Law (Queensland)* s172(1)(b).
- 117 Education and Care Services National Regulations reg 168.
- 118 *Education and Care Services National Law (Queensland)* s47(1)(c)
- 119 Education and Care Services National Regulations reg 171(2).
- 120 Australian Government Department of Education, *Belonging, Being and Becoming: The Early Years Learning Framework for Australia (V2.0)*, Australian Government Department of Education for the Ministerial Council, 2022.
- 121 Australian Children's Education and Care Quality Authority, '*Quality Area 6 – Collaborative partnerships with families and communities*', Australian Government, 2025, accessed 29 August 2025.
- 122 *Education and Care Services National Law (Queensland)*, s72(1)(f); *Education and Care Services National Regulations*, reg 172(2)(c).