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Safeguarding the future

Defining the required multi-layered approach to preventing, detecting, and responding to child sexual abuse in Australia

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Defining the required multi-layered approach to preventing, detecting, and responding to child sexual abuse in Australia

Safeguarding the future

Child sexual abuse remains one of the most severe and complex threats to the safety and wellbeing of children in Australia. Responses require coordination across multiple systems and environments.

It is clear that there have been systemic failings in the safeguarding and response to child sexual abuse in this case, and that these raise concerns about the capability and capacity of our current systems.

The evidence gathered through this review confirms:

1. **That the offending could—and should—have been detected and disrupted earlier.** Across organisations and agencies, sufficient concerns were recorded to have enabled earlier intervention had they been consolidated and treated as part of a broader safeguarding picture. Instead, information remained siloed, and the warning signs were never fully connected.
2. **The reality is stark: parents, children and staff repeatedly raised legitimate concerns about the offender, but no obvious resolution followed.** Ultimately, the offender was only apprehended after uploading digital images, not because of any effective response to the concerns that adults and children legitimately expressed.
3. **Our prioritisation of a criminal justice response means we are focused on detecting crimes rather than detecting safety threats to our children and consequently opportunities to intervene are lost.** Victim-survivors and their families were left with no pathway to resolve their concerns once police determined there was insufficient evidence to proceed.
4. **Police thresholds for action, combined with resourcing limitations, further inhibited earlier detection and contributed to missed opportunities.** These left children unprotected and families unsupported, effectively closing the door on concerns despite the potential of ongoing risks.
5. **The Working with Children Check (blue card) functioned as intended, yet offered no meaningful protection to children in this case.** Its operation did not prevent the abuse, nor did it alert organisations to the pattern of risk. The gap between the legal operation of the blue card system and community expectations of its protective factors means that trust is mislaid.
6. **At the organisational level, actions were taken in isolation, often resulting in the offender being 'moved on' rather than the risks he posed being systematically addressed, recorded and communicated.** Such responses delivered no strategic or holistic benefit to the community, and critically, did not safeguard children.
7. **The legislative and policy framework is itself fragmented.** There is no clear single owner of child safeguarding in Australia or Queensland, and the response remains overly dependent on the criminal justice and child welfare systems with a significant gap between the two.
8. **Public submissions underscored the absence of a clear pathway to raise concerns and receive services for suspected child sexual abuse.** This evidence made it clear that there is a clear gap when neither police nor the Department of Child Safety are involved. This vacuum leaves families and organisations without a protective mechanism, and children at continued risk.

Taken together, the Board's findings demonstrate systemic weaknesses: siloed information, fragmented responsibilities, insufficient thresholds for action, and a lack of coordinated safeguarding architecture. The effect is that risks are routinely identified but remain unmitigated, while families and victim-survivors are left without redress until catastrophic harm is undeniable.

Taken together, these findings point to the need for a stronger whole-of-system approach, underpinned by proactive detection, coordinated responses, investment in prevention, and sustained recovery pathways. Only by strengthening each of these domains can we deliver on our responsibility to keep children safer and support them to thrive.

A multi-layered approach to preventing, detecting, and responding to child sexual abuse in Australia is necessary. Australia can no longer rely on criminal justice system and community-based prevention activities. Perpetrators are exploiting weaknesses in our civil-law and organisational architecture, which mean that they are able to avoid detection and continue offending.

A protective ecosystem

The need for an integrated safeguarding system is clear. Child sexual abuse is a complex issue that requires a coordinated response across all levels of society and all stages of intervention. Ecological models provide a valuable framework for understanding the multifaceted nature of child sexual abuse and the importance of interconnected systems. To protect children effectively, it is essential to build systems that not only function well individually but also work seamlessly together. By bridging the gaps between systems, we can create a comprehensive and responsive safeguarding environment that prioritises the safety and wellbeing of all children.

This Review, and its associated research and public submissions, has highlighted weaknesses within and across governments, organisations and society. Challenges include managing cross-jurisdictional differences, addressing online forms of abuse, ensuring adequate resourcing for organisations, and connecting the missing pieces. Another challenge is balancing the need for coordination without creating unnecessary duplication.

Child sexual abuse in institutional settings, including ECEC settings, should be contextualised with an ecological framework. This requires child sexual abuse to be framed and considered as the interplay of a multi-level system involving:

- **individual characteristics** (of children, educators, parents, perpetrators and officials)
- **relationships** between individuals and organisations (for example, between a perpetrator and their co-workers and children in their care)
- **social structures and societal norms and attitudes** towards, for example, abuse, sex, gender, crime and punishment.

Understanding child sexual abuse through an ecological lens underscores the importance of addressing all levels simultaneously. A failure at any level—in supporting children and their families, in equipping our workforces, in a community's indifference, or a society's inadequate laws—can lead to the perpetuation of abuse. Throughout this report, our findings and recommendations repeatedly highlight the necessity of building an integrated safeguarding system that spans all levels of society and all stages of preventing, detecting, and responding to child sexual abuse, and supporting those who have been impacted.

Central to this argument is the recognition that the quality of connections between these layers and stages is paramount. Too often, systems are developed in isolation with the hope that they will function effectively on their own; however, the real threat to the safety of our children lies in the gaps between these systems. A strong ECEC sector, a strong blue card system, and strong policing system will still create risks if there are gaps between them.

“

The primary threat to child safety is not the failure of individual systems but the gaps between them that mean early warning indicators are missed, information is not shared and threats are not detected or responded to.

”

This Review has highlighted six key layers through which we can analyse and understand the safeguarding system around our children. They are:

1. the political-leadership layer
2. the criminal justice layer
3. the oversight layer
4. the institutional-organisational layer
5. the community layer
6. the family layer.

The safeguarding layers



Leadership layer

The political-leadership layer sits above and around all other layers. It is about how political actors, systems, and decisions shape the environment in which child sexual abuse is prevented, detected and responded to, and how victim-survivors and families are supported. Unlike the criminal justice or civil-law layers, which are bounded by specific systems, the political layer is broad, systemic, and multi-directional — it sets the priorities, resources, and culture that influence all other layers. Political will is necessary to sustain momentum beyond media cycles, ensuring support is not treated as a one-off event. It recognises that safeguarding children is not just technical or operational. Without sustained political leadership, other layers (families, communities, organisations, regulators, justice) may operate in fragmented, under-resourced, or inconsistent ways. The political layer provides the legitimacy, resources, and societal mandate that underpin effective multi-layered safeguarding.



Criminal justice layer

The criminal justice system plays a central role in investigating, prosecuting, and deterring child sexual abuse. Key actors include the Australian Federal Police (AFP), state and territory police, prosecutors, courts and the judiciary. This layer is responsible for holding perpetrators accountable, protecting victim-survivors, and ensuring justice. This layer sees abuse as a societal violation requiring legal accountability and therefore prioritises evidence against and punishment for perpetrators.



Oversight layer

The regulatory oversight system is emerging as a network of organisations, legal entities, and informal structures that exist between the government and the private sector that aim to prevent harm by managing risks and imposing regulatory safeguards. This approach complements criminal justice responses by managing risks before offences occur or where offences cannot be proven. This layer focuses on societal structures and governance to prevent abuse before it happens, using preventative legal mechanisms.



Institutional and organisational layer

Organisations that work with children must implement strong child safeguarding measures. This includes compliance with Child Safe Standards, staff training, clear safeguarding policies, and effective reporting processes. This layer treats institutions as microcosms where culture, policy, and behaviour shape risk; emphasising proactive prevention and ethical responsibility.



Community layer

Communities play a crucial role in prevention and detection. Local councils, NGOs, volunteers, and grassroots organisations help build protective environments, raise awareness, and identify risks. This layer recognises that community norms, awareness, and shared responsibility are crucial for early detection and support; social cohesion strengthens prevention.



Family layer

Families form the first line of protection for children. Parents, guardians, and extended family members must be equipped to create safe environments, teach children about healthy boundaries, and support disclosures. This layer recognises that family is the immediate protective environment; interventions are personalised, relational, and preventative at the most granular level.

These layers are most effective when they reinforce one another. Information and learning should flow both upward (from families and communities through organisations and regulators to the justice system) and downward (from policy, regulation, and law enforcement to communities and families). Such coordination ensures child protection is comprehensive and avoids duplication or fragmentation.

Each layer functions differently but strengthens the whole framework across prevention, detection, response, and support. Protection is maximised when:

- communities foster vigilance and responsibility and set behaviour expectations
- families are empowered to prevent and detect early
- sectors and institutions embed safeguards and accountability
- oversight entities enforce regulatory compliance and civil-law deterrence
- the criminal justice system delivers justice and deterrence.

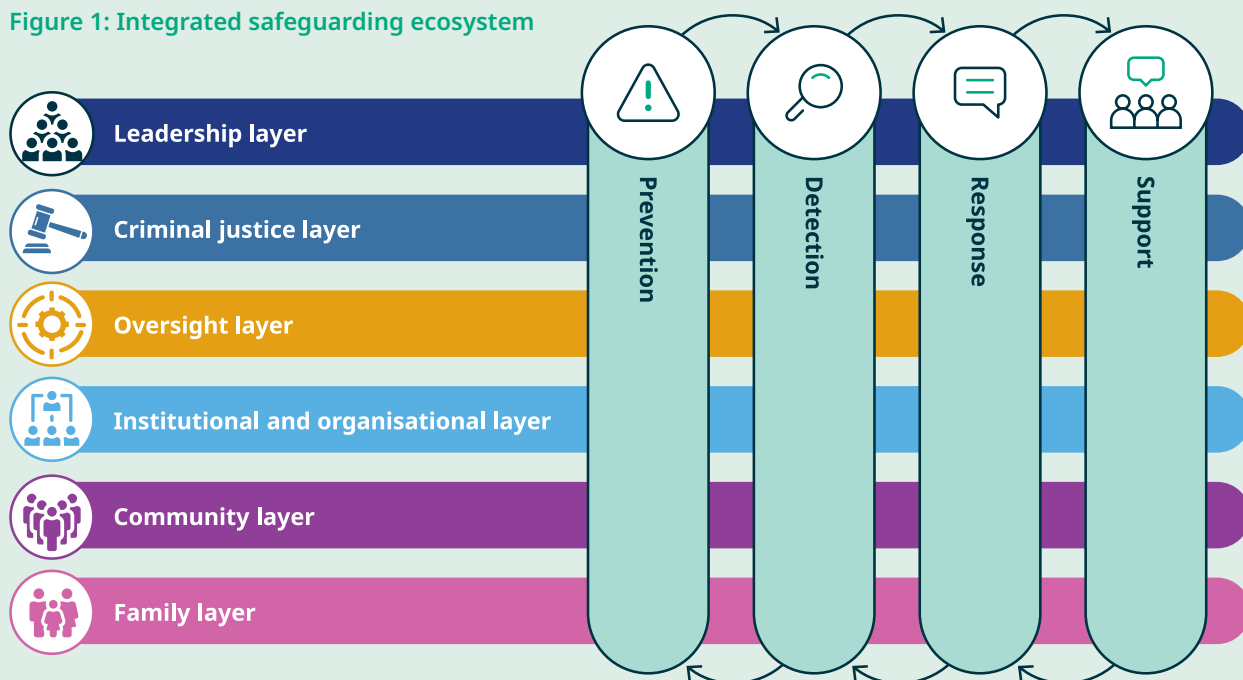
Prevention, detection, response and support are not isolated tasks they function as interconnected layers that only succeed when aligned and mutually reinforcing. Effective approaches to child safeguarding require:

- **Multi-layered situational awareness** – Each layer (family, community, institution, regulator, justice system) sees risks and harm differently. Families may notice behavioural changes, communities may observe patterns, regulators track systemic failures, and justice agencies monitor criminal activity. Only by combining these perspectives can hidden threats be surfaced early.
- **Trust networks** – Victim-survivors and their families are more likely to disclose and seek help when they have trusted relationships with safe adults, institutions, or communities. Trust also underpins information-sharing between agencies and sectors, reducing silos and preventing offenders from slipping through gaps.
- **Cross-level coordination** – No single system can carry the responsibility alone. Families need support from communities, institutions must be accountable to regulators, and civil law needs to reinforce the work of the criminal justice system. The strength of the framework lies in how these parts interlock, preventing harm where possible, detecting it quickly when it arises, and mounting an effective and compassionate response.

Each layer complements the others—legal enforcement, regulatory oversight, organisational policy, community vigilance, and family protection must communicate and reinforce one another—and information and insights can flow upward (e.g. family reports to organisations, organisations report to regulators) and downward (e.g. policy guidance reaches families and communities).

In this way, the desired safeguarding system is more than a set of discrete actions; it is a protective ecosystem where vigilance, care, and accountability are distributed across society.

Figure 1: Integrated safeguarding ecosystem



Leadership

Leadership is the key to prevention. In child safeguarding, this principle is starkly true: without committed leadership, even the most sophisticated safeguarding frameworks remain inert.

Prevention is not merely a collection of policies, procedures, or training programs; it is a mindset, and that mindset is set from the top. Leaders hold the unique position of seeing the system as a whole—the moving parts, the points of risk, and the opportunities to intervene before harm occurs. As one prominent thinker on organisational safety has observed, ‘Culture is shaped from the top. If leaders do not prioritise safety, no amount of rules or processes will create it’.

As noted in the recent report of the 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* (2023):

Across all the types of institutions we examined, we rarely saw examples of child-centred leadership. Sometimes this was because of a lack of skill and good processes to guide leaders, which led to clumsy, slow and ineffective responses. But in other instances, we saw what can only be described as a callous lack of care for victim-survivors of abuse. This was more difficult for us to understand, with some leadership failings so extreme they caused enormous pain and suffering to those affected. The driving factors behind this poor leadership included an apparent disregard for children or victim-survivors, laziness or lack of interest, outdated understandings of child sexual abuse, lack of skill and capability, overwhelm and unreasonable workloads.

We consider leadership failures are more likely to occur, and be far more damaging, where there is a lack of accountability. We saw some senior leaders use terms like ‘shared accountability’, in some cases, to sidestep their individual accountability. Sometimes, this individual accountability comes from a person holding a legal duty, a professional duty or a moral duty. Yet we saw leaders lack curiosity or initiative, delegate their responsibilities or shift blame to others. We saw defensiveness rather than self-reflection. Some of these attitudes endured throughout our Inquiry, even when confronted with the devastating scale of what went wrong. This type of leadership can have much broader implications, by discouraging people from speaking up about child safety or signalling that promoting child safety is not a priority for staff more broadly.

While we agree that child safety is a responsibility that should be shared among all adults working in an institution, leaders should have specific responsibilities that reflect their power and influence in decision making. They need professional development and support to make sure they are equipped to identify and respond well to risks of abuse. If leaders make mistakes, they should acknowledge them and commit to learning more, so they can do better in future. Leaders should model a culture of improvement and self-reflection, so it positively influences everyone in the organisation.¹

A leader who makes prevention a priority communicates its importance through decisions, resource allocation, and accountability measures. They ensure that staff understand not only what to do, but why it matters, creating a culture in which identifying and mitigating risk is part of everyday practice. Conversely, when leadership does not signal that prevention matters, risk becomes siloed, responses become reactive, and opportunities to stop abuse before it occurs are lost. Visible, committed leadership is the single strongest predictor of whether prevention and safeguarding programs will succeed or fail.

Prevention naturally benefits from seeing the ‘whole picture’—understanding how policies, processes, people, and systems interact, and where gaps may allow abuse to occur. Leaders are uniquely positioned to integrate these perspectives, bridging across silos and disciplines to create coordinated responses. In child safeguarding, this means connecting regulatory oversight, organisational policy, workforce culture, family engagement, and community awareness into a coherent whole. Without such holistic leadership, the system remains fragmented, and children remain exposed to preventable risks.

Ultimately, leadership is both the driver and the safeguard of prevention. It is leadership that ensures risk is identified before abuse occurs, that resources are allocated to proactive measures, and that accountability is embedded into the fabric of an organisation. As one child safety expert put it, ‘Prevention is not something that happens by accident; it is the product of deliberate, informed, and unwavering leadership’. In this sense, investing in leadership, and holding leaders accountable for prevention, is not an optional strategy—it is the very foundation upon which all effective safeguarding rests.

Transformational Recommendation 8: Establish robust and centralised national and state governance for child safeguarding

You will not find a political leader in Australia that has not talked about children being our most precious resource, or our number one priority, however children have long been treated as diffuse, secondary considerations in the architecture of government and in national policy.

This has created significant gaps, duplication, and inconsistencies in the way governments approach child safeguarding and threats to children. While it is universally recognised that children are a uniquely vulnerable population, the structural frameworks through which Australian governments manage priorities often fail to reflect this reality. The decentralisation of child-related responsibilities across multiple portfolios has contributed to a complex, undefined, and sometimes ineffective policy landscape that leaves children at risk.

The establishment of National Cabinet in March 2020 was intended to improve intergovernmental coordination, replacing the Council of Australian Governments (COAG). While COAG had a broader architecture in which child-related issues were addressed—most notably through the Community and Disability Services Ministers' Conference (CDSMC), which endorsed the *National Framework for Protecting Australia's Children (2009–2020)*,² National Cabinet does not include a central, dedicated focus on children. Since this transition, there has been an observable fragmentation of child-focused policy, with responsibility dispersed across multiple portfolios, from Health and Education to Women's Safety, Housing, and Disability Reform. National Cabinet's priorities are regularly refreshed in response to emergent national issues. As of 2024–25, these priorities include gender-based violence, disability reform, health reform, housing, intergovernmental cooperation, and Closing the Gap. While some of these intersect with child safety and wellbeing, none of them explicitly prioritise children as a distinct policy cohort. Instead, children are largely absorbed under broader issues e.g. as 'women and children' within gender-based violence or as beneficiaries within disability or health reforms, rather than recognised as a primary national focus in their own right.

Ministerial Councils report to National Cabinet across a wide spectrum of domains, including Agriculture, Attorneys-General, Community Services, Data and Digital, Education, Emergency Management, and more. Children's issues, however, remain scattered across these portfolios, often resulting in inconsistent approaches, overlapping responsibilities, and policy duplication. Some councils may meet to fulfil statutory obligations without any requirement to report to National Cabinet, further diluting accountability for child-focused outcomes.

The consequences of this decentralisation are tangible. Without a central locus of responsibility, there is no single entity charged with monitoring the effectiveness of child safety policies, no dedicated mechanism for resolving inconsistencies across jurisdictions, and no clear strategic direction for advancing national priorities for children. Policy complexity increases as governments attempt to coordinate responses across portfolios that may have competing objectives, timeframes, or accountability measures. The net result is that children, despite being among the most vulnerable in society, are left outside the political and administrative spotlight, making it more difficult to identify systemic risks, address failures, or ensure effective intervention.

This structural reality underscores a critical lesson: the priority that political leaders place on children must be reflected in government architecture. If children are genuinely to be considered a national priority, their interests cannot be decentralised across a patchwork of portfolios or buried under broader policy agendas.

Instead, governments must create centralised, accountable structures with dedicated oversight, clear lines of responsibility, and authority to coordinate child-related policy across jurisdictions. Only through such a model can policy be coherent, consistent, and effective, ensuring that the safety, wellbeing, and development of children are treated as the urgent national priority they deserve to be.

In short, the absence of a central, dedicated focus on children in the highest levels of national policy is not merely an administrative gap—it is a structural barrier to effective child protection. For policy to work, government structures must mirror political priorities, giving children a clear, visible, and central place in national planning and decision making. Until this occurs, children will remain at risk of falling through the cracks of fragmented governance.

National Cabinet is a forum for the Prime Minister, Premiers and Chief Ministers to meet and work collaboratively. National Cabinet was established on 13 March 2020 and is chaired by the Prime Minister.

National Cabinet's priorities are regularly reviewed and updated. National Cabinet is a dynamic forum, responding to matters requiring national coordination as they arise. Accordingly, its priorities are refreshed on an ongoing basis. National Cabinet's current priorities are:

- **Addressing gender-based violence:** Actions towards achieving the shared goal of ending violence against women and children.
- **Disability reform:** Reforms to improve the experience of National Disability Insurance Scheme (NDIS) participants and restore the original intent of the scheme, including designing a new foundational supports system.
- **Health reform:** Actions to embed long-term, system-wide structural health reforms including a new National Health Reform Agreement.
- **Housing reform:** National reforms to improve housing affordability and supply, and to strengthen renters' rights.
- **Intergovernmental cooperation:** Overseeing the development of, and commitment to, Intergovernmental Agreements to achieve national objectives across priority areas including education, housing, skills and workforce and infrastructure.
- **Closing the Gap:** Objectives outlined in the National Agreement on Closing the Gap, agreed by all Australian Governments and the Coalition of Peaks, remains a commitment across all priority areas.³

Ministerial Councils responsible for delivering these priorities are required to report regularly to National Cabinet on their progress, ensuring First Ministers continue to drive these reforms. Current Ministerial Councils reporting to National Cabinet in 2024–25 are:

- Agriculture
- Attorneys-General
- Community Services
- Council on Federal Financial Relations
- Data and Digital
- Disability Reform
- Education
- Emergency Management
- Energy and Climate Change
- Environment
- Health
- Housing and Homelessness
- Infrastructure and Transport
- Joint Council on Closing the Gap
- Planning
- Skills and Workforce
- Trade and Investment
- Veterans' Affairs
- Water
- Women and Women's Safety.⁴

This list may change in accordance with National Cabinet priorities.

The absence of children is stark.

While the COAG itself did not have a dedicated ‘COAG Council for Children’, child-related issues were addressed through COAG’s broader architecture. Specifically, the CDSMC, endorsed the *National Framework for Protecting Australia’s Children (2009–2020)*, one of the most significant child-focused national reform agendas coordinated under COAG.⁵

Since the move to National Cabinet, there has been no central role focused on children, and an observable fragmentation of child-related policy. Recent cases of abuse in early childhood education and care (ECEC) services highlight the competing but intersecting roles of Education Ministers, Attorneys-General, Police Ministers, Communications Ministers, and other roles such as Treasurers and Employment Ministers.

To date, the national response to current cases in Queensland, New South Wales and Victoria has predominantly related to policy changes within the ECEC sector. There are grave fears that this will simply move perpetrators to other sectors where there are greater system vulnerabilities.

Queensland suffers the same fragmentation as all other states and territories, including a child protection portfolio that is swamped in demand related to familial abuse and has no capacity to respond to community-based threats to children.

Since October 2024, Queensland has taken a significant step by appointing a Cabinet Minister for Families. This appointment signals a welcome elevation of the importance of child safety, however it remains that that children require a coordinated, cross-portfolio approach. Yet, the title alone is insufficient. For this commitment to translate into meaningful outcomes, the Minister must be empowered with sufficient resources, authority, and mechanisms to operate across Cabinet and across portfolios. Only a Minister with a holistic view of children’s needs can ensure that policy is coherent, integrated, and responsive.

This Queensland example underscores a broader principle: children’s lives cannot be divided into discrete categories that match bureaucratic structures. Holistic oversight is essential to identify systemic risks, prevent gaps in service, and coordinate policy and practice in ways that genuinely protect children. Without a centralised, empowered leadership role, children remain vulnerable to the fragmentation and inefficiencies that have long undermined child safeguarding at both national and state levels.

If it is acceptable and appropriate for the Board of an early childcare centre to prioritise child safety, and have dedicated mechanics to ensure this priority, then the same must be true for the mechanics of government.

A common critique of creating a dedicated approach for children is that children are already considered across multiple government portfolios - health, education, housing, disability, and justice - and that a standalone portfolio risks isolating children from broader policy work. While children are referenced in existing portfolios, the operational reality of government shows that without centralised leadership, children’s interests are dispersed, inconsistently applied, and often secondary to other objectives.

Elevating the safety of children within the machinery of government does not create a silo; it centres children and families in the decision making of government, ensuring that all policies and programs are examined through the lens of their impact on childhood wellbeing.

Analogies to other cross-cutting portfolios help illustrate this principle:

1. **Business** – A Minister for Business is responsible for driving economic policy across multiple departments—industry, innovation, taxation, employment, and trade—ensuring a coherent strategy. Business issues touch multiple areas, but a dedicated minister provides oversight, coordinates initiatives, and aligns departments towards shared economic outcomes. This central leadership does not isolate business policy; it integrates it across government functions.
2. **Tourism** – Tourism spans transport, environment, culture, hospitality, and regional development. A Minister for Tourism ensures that all relevant departments contribute to the growth, promotion, and sustainability of the sector. Without such leadership, efforts can be fragmented, with competing priorities and inconsistent outcomes. Central oversight ensures strategic direction, resource allocation, and accountability.

Similarly, centring a whole-of-government approach to children and families would not confine child-focused work to one department or create redundancy. Instead, the role places children and families at the centre of government mechanics, aligning policies to ensure every decision affecting children is considered holistically, that resources are allocated effectively, and that systemic gaps or conflicts between portfolios are identified and resolved.

The lived reality of childhood spans multiple domains. A child's safety cannot be compartmentalised into discrete policy silos; their health, education, housing, and social development are interdependent. Without a central leader, no single department can see the full picture or respond effectively to overlapping risks. The Board holds legitimate concerns, that for example, given the recent actions to strengthen ECEC, and the known number of infants in Queensland residential care, the threats to children may have already moved to a new sector or alarmingly, continues undetected in other sectors.

A dedicated approach ensures a consistent, strategic approach, reduces fragmentation, and reinforces that children and families are a political and operational priority rather than an afterthought.

Ultimately, centring children and families in the mechanics of government strengthens oversight, accountability, and outcomes. It ensures that all portfolios work in concert for children, rather than including them as secondary considerations, and it provides the structural leadership necessary to translate political commitment into practical, cross-departmental action.

Transformational Recommendation 8: Establish robust and centralised national and state governance for child safeguarding

To ensure the protection of children from abuse and neglect is treated as a matter of the highest national priority, it is recommended that the Australian and Queensland Governments immediately establish dedicated and enduring governance mechanisms for children and child safeguarding. This must include:

- formally establishing clear federal Ministerial accountability and a permanent Ministerial Council on Child Safeguarding as a standing committee of National Cabinet, providing a cross-jurisdictional mechanism for driving coordinated national policy, sharing critical intelligence, and progressing nationally consistent child safeguarding legislation and systemic reform, including the outstanding recommendations from the Royal Commission
- making the safety of children an explicit priority within the Queensland cabinet process (by establishing a dedicated Cabinet Sub-committee charged with overseeing the state's responses to child abuse and neglect, ensuring accountability across portfolios, and embedding a whole-of-government approach to preventing harm and supporting recovery).

This governance reform is essential to elevate child safeguarding to a national and state leadership level, enable urgent system improvements, and ensure that past failures to protect children are not repeated.

Operational Recommendation 18: Produce a clear long-term strategy for the protection of children

The Review has reinforced the imperative that child safeguarding must sit at the centre of government planning and action. Current arrangements, while comprehensive in parts, remain fragmented across departments, sectors, and programs. Children's wellbeing is not consistently embedded as a primary consideration in decision making, leading to systemic gaps where risks persist undetected and interventions are reactive rather than preventative.

Current national strategies tend to focus on primary prevention and welfare-oriented models, which are vital for promoting wellbeing but do not fully capture the spectrum of threats children face. They often conceptualise children as secondary participants, relying on adult behaviour change or parental capacity to reduce risk. While important, this approach insufficiently recognises children as potential targets of deliberate harm, including sexual abuse and exploitation, nor does it adequately integrate proactive threat detection and intelligence-based safeguarding.

This has been laid stark for the Board when it was confronted by the compelling reality that law enforcement entities have known for some time that perpetrators strategically and intentionally target children under the age of five to prevent detection, yet there has been a paucity of protective actions taken to respond to this threat.

A Queensland strategy must centre children in the design and delivery of safeguarding systems, not only in the sense of protecting their welfare but also by acknowledging the real and present dangers they may face in modern society. This requires reframing children not only as beneficiaries of protection but as individuals whose safety is a measurable outcome across all government functions. Child safeguarding cannot succeed in isolation from family and community contexts. Evidence demonstrates that effective protection and resilience are contingent on supporting parents, caregivers, and communities to provide safe, nurturing environments. A long-term strategy would embed mechanisms that recognise the dual role of government: to prevent harm directly to children and to strengthen protective environments around them. This dual focus ensures that child safety is treated as a societal responsibility rather than a narrow departmental obligation.

Current national approaches, including those oriented towards child sexual abuse prevention, have achieved important progress in education, awareness, and risk reduction, however, these models:

- focus on parents and adults rather than systematically assessing emerging threats to children
- fragment responses across sectors, limiting the ability to aggregate intelligence and identify patterns of risk across schools, care settings, and community environments
- emphasise reactive interventions, responding to abuse after it occurs rather than integrating predictive risk assessment and early intervention strategies.

Our Review has shown that the landscape for children is changing rapidly, with new threats emerging in digital environments, transient living arrangements, and multi-jurisdictional interactions. A strategy limited to welfare and primary prevention cannot respond to these realities. Queensland requires a clear, long-term, child-centred framework that unites intelligence, prevention, response, and oversight across government and society.

A long-term Queensland child safeguarding generational strategy should:

1. Elevate child safety as a core government priority.
2. Integrate parents, caregivers, and communities into the child safeguarding framework, recognising their role in prevention and resilience.
3. Adopt a threat-focused perspective, addressing both known risks and emerging challenges including sexual abuse, exploitation, neglect, and systemic failures.
4. Establish clear accountability and oversight mechanisms, including centralised leadership and cross-sector intelligence sharing.
5. Enable adaptive planning, incorporating evolving evidence, technological change, and socio-cultural shifts over time.

In short, Queensland needs a generational strategy for child safeguarding, not a series of disconnected policies or short-term programs. By thinking strategically long term, government can move from reacting to incidents to predicting, preventing, and mitigating threats, ensuring that children are genuinely safe, supported, and central to all protective interventions.

Operational Recommendation 18: Produce a clear long-term strategy for the protection of children

That the Queensland Government develop and implement a long-term child-centred safeguarding strategy that places the safety of children at the centre of government planning and decision making. The strategy should:

- be framed on the prevent, detect, respond and support themes emerging from this report
- integrate intelligence, oversight, prevention, and response across all relevant government departments, regulators, and programs
- recognise the critical role of parents, caregivers, and communities in protecting children and strengthening protective environments
- shift the focus from children as secondary participants to active consideration of emerging threats, including sexual abuse, exploitation, neglect, and systemic risks
- embed clear accountability and leadership mechanisms to ensure coordination, transparency, and continuous improvement across the child safeguarding system
- be adaptive and evidence-informed, incorporating emerging research, technological change, and evolving social contexts to ensure enduring effectiveness
- promote a culture of proactive prevention, early intervention, and continuous learning, ensuring children's safety remains a central and measurable outcome across all government functions.

This strategy should serve as a generational blueprint for child safeguarding in Queensland, replacing fragmented, short-term approaches with a sustained, coordinated, and accountable framework designed to protect children from harm into the future.

Operational Recommendation 19: Engaging young people, victim-survivors and experts in strategy and resource development

The Review has highlighted that children and young people, along with people with lived experience of child sexual abuse, possess unique insights that are critical for effective safeguarding strategies. Their perspectives illuminate the realities of risk, barriers to reporting, the gaps in our systems and the supports that are genuinely effective in preventing harm and promoting healing.

Involving young people and victim-survivors as expert advisors ensures that policy and program design is informed by those directly affected, rather than solely by adult professionals or bureaucratic assumptions. This engagement fosters trust, accountability, and transparency, demonstrating a genuine commitment to centring the voices of children in safeguarding efforts.

Across Australia and internationally, engaging lived-experience panels has become recognised as best practice in policy and program design. Such panels provide practical guidance on:

- identifying emerging risks in both physical and digital environments
- improving reporting mechanisms and pathways for disclosure
- designing prevention and education programs that are relevant and accessible to children and young people
- shaping policies that balance child safety with empowerment and participation rights
- evaluating the effectiveness of interventions and oversight mechanisms from the perspective of those most affected.

Importantly, engaging victim-survivors in this way should be done safely, ethically, and respectfully, with appropriate support, safeguards, and compensation for participation. Their contributions should influence decision making at the highest levels, ensuring that the strategy reflects lived realities as well as legislative and organisational priorities.

Embedding these voices at the outset positions Queensland's child safeguarding system as participatory, informed, and accountable, strengthening the legitimacy and impact of the safeguarding system.

Operational Recommendation 19: Engaging young people, victim-survivors and experts in strategy and resource development

That the Queensland Government establish an Expert Advisory Panel to inform the development, implementation, and ongoing evaluation of the long-term Child Safeguarding Strategy. The panel should include young people, victim-survivors, parents, researchers and experts. These members should:

- be actively involved in shaping strategy priorities, policies, and programs
- provide insights on emerging risks, reporting pathways, and effective prevention and intervention approaches
- operate with appropriate safeguards, support, and recognition of participants' wellbeing
- ensure lived experience informs decision making at all stages, creating a child- and victim-survivor-centred approach
- contribute to the evaluation of the strategy's effectiveness, providing feedback on its relevance, accessibility, and impact from the perspective of young people and victim-survivors.

Engaging this panel will ensure that Queensland's child safeguarding system is authentic, accountable, and responsive to the needs and realities of those it is designed to protect.

Transformational Recommendation 9: Establish a safeguarding entity

This Review has consistently found that Queensland's current approach to child safeguarding is fragmented, reactive, and insufficiently accountable. While there is widespread acknowledgement that protecting children is a shared responsibility, in practice this responsibility is dispersed across multiple agencies, regulators, and organisations each holding only part of the picture.

Without a central entity to lead, coordinate, and hold accountability for the protection of all children from sexual abuse, our initiatives to prevent, detect, and respond to threats risk being applied unevenly across sectors, and their impact will be diluted.

Our findings reveal that there is a system-wide lack of understanding about child sexual abuse and safeguarding practices. This deficit is not limited to individuals or frontline services; it extends into how government structures itself. Different agencies collect information, regulate practice, and intervene in risk, and while so many good people are doing their roles well, there is no clear mechanism to integrate intelligence or to drive a unified safeguarding agenda.

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This absence of centralised leadership creates duplication in some areas, gaps in others, and ultimately leaves children less safe. The Board considers that unless we shift the paradigm of how government works in child safeguarding, Queensland will always be chasing crime rather than preventing threats.

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Current arrangements are designed around institutional boundaries rather than the needs of children. As a result, warning signs are missed, risk is assessed in silos, and opportunities for prevention are lost. Bringing together related services and regulatory schemes would strengthen and amplify Queensland's approach. It would reduce duplication, promote consistency, and ensure that insights gained in one part of the system immediately inform decisions in another. Queensland has an opportunity to move beyond fragmented oversight and establish a safeguarding model that sets the national benchmark.

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We want to see when an allegation is raised a clear agreement on who does what and when. We need someone to lead this centralised approach, with a resulting risk assessment. What we need to move towards is clarity on who provides the primary role of assessing and making recommendations on risk.

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Multiple submissions received by the Board reflected on the need to streamline and centralise processes. For example, the Australian Childhood Foundation suggested that duplication and regulatory fatigue could be avoided by establishing or identifying a single lead agency to receive, triage, and coordinate all allegations of reportable conduct and concerning behaviour involving those working with children, similar to the Local Area Designated Officers model in the United Kingdom; which should be supported by a streamlined digital reporting platform.

To achieve this, Queensland should establish a new Child Safeguarding Entity. This entity would provide a single point of leadership, accountability, and coordination for child safety and wellbeing across the state.

It should integrate the following core functions:

- **Blue Card Services**, ensuring that suitability assessments are informed by real-time safeguarding intelligence.
- **Reportable Conduct Scheme**, enabling cross-organisational risk detection and response.
- **Child Safe Standards**, driving cultural change in organisations and embedding safeguarding practice.
- **System Intelligence and Oversight**, collating information across sectors to identify risks and trends, and ensuring accountability for responses.
- **Coordination of community awareness and capacity building** to prevent and respond to child sexual abuse.
- **Coordination of organisational capacity building** to prevent and respond to child sexual abuse.
- **A safety net for concerns and complaints from parents and coworkers** who have found responses by organisations, regulators, police, or other criminal justice agencies to be insufficient to protect children.

Government could also consider including within the new Child Safeguarding entity:

- all or part of the early childhood regulatory authority (ECRA) with specific focus on the specialised teams that investigate child abuse and neglect
- residential care licensing (noting this may be subject to the current Commission of Inquiry into Queensland's child safety system)
- functions of the current Office of the Public Guardian including child advocacy; guardianship of children in care; and community visitor program (noting this may be subject to the current Commission of Inquiry into Queensland's child safety system).

Such a body would not replace the existing responsibilities of frontline agencies but would instead **align and elevate their efforts**, ensuring that the whole system functions as more than the sum of its parts. It would provide:

- **Leadership**, by setting the agenda for safeguarding reform and monitoring progress.
- **Accountability**, by being clearly responsible for ensuring children are protected across all settings.
- **Intelligence**, by collating and analysing data from multiple sources to detect threats earlier.
- **Transparency**, by reporting to government and the community on performance and outcomes.
- **Consistency**, by ensuring that safeguarding standards are applied uniformly across sectors.

Transformational Recommendation 9: Establish a safeguarding entity

That the Queensland Government legislate to establish a new safeguarding entity to provide a central point of leadership, accountability, and coordination for child and vulnerable person safeguarding. This entity should consolidate related regulatory and safeguarding functions and act as the system's intelligence hub, ensuring Queensland moves from fragmented responses to a unified, proactive safeguarding system.

By addressing these areas, systems can bridge the gaps that currently compromise the safety of children. An integrated approach ensures that all levels of society are working together towards the common goal of preventing and responding to child sexual abuse.

Conclusion

This Review is the first of its type in Queensland. It is the first time the Board has ever been requested to undertake such a review by the Attorney-General which does not involve the death of a child. It is also the first time that the Board has engaged with families and undertaken a public call for submissions. The Board has been mindful when making recommendations in this report of the enormity of the issues the Review has identified, which have been further amplified by similar cases happening in other jurisdictions and a renewed national focus on responding to institutional child sexual abuse, almost ten years to the day since the Royal Commission into Institutional Responses to Child Sexual Abuse made its first recommendations in the Working with Children Report, many of which have yet to be implemented.

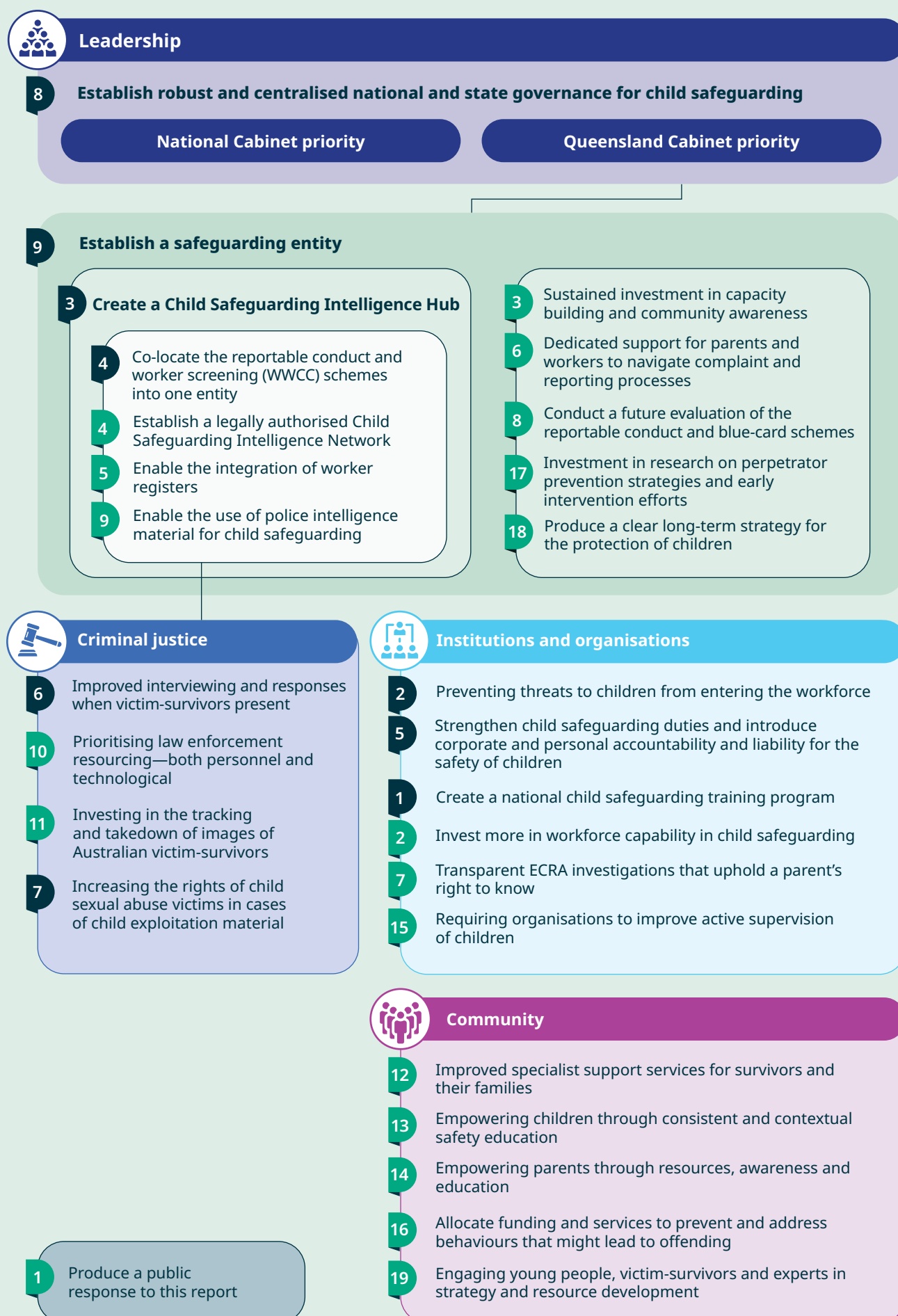
It is these ongoing cases, that have led us to recommend a future where there is an integrated approach to child safeguarding.

Our recommendations are deliberately designed to operate across multiple layers of the ecological model, recognising that child safeguarding requires coordinated interventions at the individual, relational, organisational, community, and societal levels. No single reform is sufficient on its own; each recommendation reinforces and amplifies the others, creating a comprehensive system of protection.

In having regard to the critical findings of the Review, and the need to take a multilayered and ecological approach, the following major recommendations are considered to make the biggest impact to the future safety of children:

1. Empowering better collation of integrated intelligence below the criminal justice threshold in a way that enables and authorises civil-law to develop and deliver threat assessments – **Transformational Recommendation 3: Create Child Safeguarding Intelligence Hub.**
2. Provide a central point of accountability for proactively seeking intelligence, developing the integrity of the integrated intelligence hub, and pushing information to the police, regulators and organisations that are required to act – **Transformational Recommendation 9: Establish a safeguarding entity.**
3. Lifting the safety of children as a primary issue within the mechanics of government – **Transformational Recommendation 8: Establish robust and centralised national and state governance for child safeguarding.**
4. Strengthening the obligations on organisations to detect, prevent and respond to threats of child sexual abuse before they occur – **Transformational Recommendation 2: Preventing threats to children from entering the workforce** and **Transformational Recommendation 5: Strengthen child safeguarding duties and introduce corporate and personal accountability and liability for the safety of children.**
5. Improving the response to children who have been offended against, and their families – **Transformational Recommendation 6: Improved interviewing and responses when victim-survivors present** and **Transformational Recommendation 7: Increasing the rights of child sexual abuse victim-survivors in cases of child exploitation material.**
6. Improve worker and community awareness of child sexual abuse, grooming and the likelihood of threats – **Operational Recommendation 2: Invest more in workforce capability for child safeguarding; Transformational Recommendation 1: Create a national child safeguarding training program; Operational Recommendation 3: Sustained investment in capacity building and community awareness** and **Operational Recommendation 14: Empowering parents through resources, awareness and education.**

Figure 2: How the recommendations nest and integrate for an effective safeguarding system



At the organisational level, measures such as enhanced training for staff, embedding safeguarding into recruitment and performance management, and providing accessible therapeutic and counselling support empower children, families, and professionals with knowledge, resilience, and tools to identify and respond to risks. Relational interventions, including improved reporting processes, mandatory parent notification, and clear pathways for disclosures, strengthen the immediate networks around children, ensuring that concerns are acted upon promptly and effectively.

Organisationally, our recommendations on leadership accountability, governance, and risk-informed staffing practices create cultures where safeguarding is embedded into everyday operations rather than treated as a compliance exercise. Community-focused measures, including awareness campaigns, educational programs for children and parents, and cross-sector collaboration initiatives broaden the protective environment beyond individual organisations, reinforcing norms around child safety and collective responsibility.

Finally, societal and systemic reforms—such as the establishment of a central child safeguarding entity, integrated worker registers, and improvements to national frameworks and regulatory oversight—ensure consistency, transparency, and alignment across sectors and jurisdictions. By designing recommendations to interact across these levels, we create a multi-layered, mutually reinforcing safeguarding system capable of both preventing abuse and responding effectively when it occurs.

To make the rationale for our recommendations clear, we have developed a visual map that plots each reform across the ecological model. Rather than simply showing interconnections, this map demonstrates that we have deliberately targeted specific interventions to each level of the system. Our approach has been to analyse the child safeguarding ecosystem in its entirety, identify the critical weaknesses at each level—from the individual child and their immediate relationships, to organisational cultures, community networks, and systemic, cross-jurisdictional structures—and design reforms that address those precise vulnerabilities.

By targeting each level deliberately, our intention is to treat the ailments present across the system, making the whole safeguarding ecosystem healthier, more resilient, and capable of preventing harm rather than merely reacting to it.

Critically, our review has identified that one of the most harmful gaps in the modern child safeguarding landscape is the distance between the thresholds of the criminal justice system and the remaining layers of protection. While police and prosecution agencies operate at a high evidentiary bar, the surrounding organisational, sectoral, and regulatory safeguards are often left to function in isolation. This disconnect allows harmful individuals to exploit system gaps, leaving children exposed to risk.

Our most radical recommendations are deliberately targeted at closing this gap. The creation of an **integrated intelligence hub**, the **merger of the Working with Children Check and Reportable Conduct Scheme**, and the establishment of a **centralised child safeguarding entity** are designed to bridge the divide between criminal justice responses and sector-specific regulatory frameworks. By linking intelligence, regulatory oversight, and operational practice, these reforms ensure that emerging threats to children are identified, shared, and acted upon—long before harm escalates to a criminal threshold.

In effect, these measures seek to connect the high-threshold criminal justice response with preventative and organisational layers, creating a continuous safeguarding network. This integrated approach means that no child is left unprotected simply because existing systems failed to communicate or coordinate. It transforms our child protection architecture from a set of isolated silos working across different layers into a cohesive, proactive system where risks are more easily visible, managed, and mitigated across all levels.

We hope that both the Queensland and Australian Governments respond to our proposals with similar precision and ambition, taking a holistic yet level-specific approach to child safeguarding that matches the complexity of the risks children face today.

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Protecting children from sexual abuse is not the responsibility of any single agency—it is a shared obligation that demands coordinated and sustained action. These reforms are not incremental adjustments—they constitute a transformative vision for child safeguarding in Queensland.

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Figure 4: Our key recommendations across our safeguarding framework



Operational Recommendations

- 1 Produce a public response to this report
- 16 Allocate funding and services to prevent and address behaviours that might lead to offending
- 17 Investment in research on perpetrator prevention strategies and early intervention efforts

- 10 Prioritising law enforcement resourcing—both personnel and technological
- 11 Investing in the tracking and takedown of images of Australian victim-survivors

- 4 Establish a legally authorised Child Safeguarding Intelligence Network
- 5 Enable the integration of worker registers
- 6 Dedicated support for parents and workers to navigate complaint and reporting processes
- 8 Conduct a future evaluation of the reportable conduct and blue card schemes
- 9 Enable the use of police intelligence material for child safeguarding

- 2 Invest more in workforce capability in child safeguarding
- 7 Transparent ECRA investigations that uphold a parent's right to know
- 15 Requiring organisations to improve active supervision of children

- 3 Sustained investment in capacity building and community awareness
- 12 Improved specialist support services for victim-survivors and their families
- 13 Empowering children through consistent and contextual safety education

- 14 Empowering parents through resources, awareness and education
- 18 Produce a clear long-term strategy for the protection of children
- 19 Engaging young people, victim-survivors and experts in strategy and resource development

Final say - Chairperson

This year-long review has reinforced a clear and urgent truth: protecting children from sexual abuse is not the responsibility of any single agency, sector, or level of government—it is a shared obligation that requires coordinated, comprehensive, and sustained action. This sharing of obligation, however, cannot dissolve or limit leadership accountability.

The evidence examined throughout this review demonstrates that piecemeal approaches, siloed responsibilities, and fragmented systems produce critical gaps that perpetrators exploit and that leave children vulnerable.

To create meaningful change, Queensland must move beyond incremental reforms and towards a fully integrated, forward-looking child safeguarding system.

Ultimately, what this review seeks to achieve is a future system in which accountability, intelligence, prevention, detection, response, and support are deliberately unified and robustly resourced. At its core, this requires a reformed architecture of government, providing *a single point of leadership and accountability for child safeguarding* across both state and national levels. Such a structure will empower Ministers and departments to execute their functions effectively while closing the gaps that currently exist between portfolios and agencies.

Central to this architecture is the establishment of a new *Child Safeguarding Entity*, designed as a pivotal component of a focused child protection scheme. This entity would consolidate existing mechanisms—the blue card, Reportable Conduct Scheme and Child Safe Standard—into an integrated operation that bridges the critical gap between legitimate concerns and the criminal threshold. It would operate an *Integrated Intelligence Hub*, resourced to proactively detect threats to children by consolidating and analysing information from across state and national regulatory bodies, institutions, employee registers, and policing activities. This entity would also lead the development of a *long-term Queensland strategy* for the prevention, detection, and response to child sexual abuse, while delivering accessible resources for organisational and community awareness, training, and support.

Importantly, this system would provide *a trusted avenue for parents, family members, colleagues, and staff* to report concerns that do not meet the police threshold, ensuring that even early or ambiguous warning signs are received, recorded and analysed. It would *coordinate resources for support and healing*, including specialist counselling support for victims and their families, recognising that safeguarding is not limited to preventing abuse but encompasses comprehensive support for those who have been impacted.

Organisations must be held to *higher standards of organisational accountability*. Boards, directors, and individuals should bear responsibility for recruitment decisions, referee checks, and the documentation of dismissals. Penalties should be imposed for failing to report or maintain records of complaints and concerns. These measures ensure that organisations do not merely react to abuse but actively safeguard against it.

The police response to child exploitation material must be resourced and specialised.

Dedicated staffing for the frontline work associated with victim identification must be doubled, and technological tools—including AI—should be systematically integrated into detection processes. Similarly, the criminal justice system must adapt to enable victim impact statements to accompany child exploitation material, recognising and amplifying the voices of victim-survivors within prosecutorial processes.

Taken together, these reforms are not incremental adjustments—they constitute a transformative vision for child safeguarding in Queensland.

A future system built on these principles will be proactive, intelligence-led, and holistic; it will unite government services, organisations, and communities in a shared responsibility for children's safety. Most importantly, it will close the gaps that currently allows perpetrators to remain undetected and abuse to occur unaddressed, ensuring that every child grows up in an environment that is not only safe but actively protective.

This review presents a vision: safeguarding children is not a task that can be delegated or compartmentalised. It demands integrated structures, shared accountability, and unwavering commitment at every level of our society. We all have a role to play.

By implementing our recommendations, Queensland can instead build a system that is not only responsive to abuse when it occurs, but anticipatory, preventative, and restorative—ultimately delivering on the promise of a safer future for every child.



Luke Twyford
Chairperson,
Child Death Review Board
November 2025

Recommendations

Operational Recommendation 1: Produce a public response to this report

That the Australian and Queensland Governments both separately produce a public statement outlining the strategic transformation it commits to leading. This public statement should directly respond to the future system presented in Part G of this report, and include information on the planned timing, accountability and resourcing allocated to improve the prevention, detection, response and recovery from child sexual abuse.

Operational Recommendation 2: Invest more in workforce capability for child safeguarding

That the Queensland Government invest in embedding mandatory training across all child-related sectors on:

- the identification of grooming behaviours (including the grooming of organisations, colleagues, parents and victims)
- how to raise, challenge and discuss behaviours of concern
- the responsibilities of workers and organisations for child safeguarding
- best practice approaches to receiving and responding to disclosures from children.

This training should be standardised, evidence-informed, and incorporated into professional registration, accreditation, and induction processes, with regular refreshers. Such investment will ensure that child safeguarding becomes a core competency of the Queensland workforce, significantly increasing the likelihood that risks are detected early, concerns are acted upon, and children are protected from harm. Government-funded training should be positioned as a complement to, not a replacement for, sector responsibility. The expectation must remain that organisations embed safeguarding capability as part of their core duties, developing and maintaining training that reflects their specific contexts and risks.

The Queensland Government's investment, therefore, should be directed toward creating high-quality, evidence-informed programs that set a consistent baseline across sectors and provide specialist expertise that individual organisations may not be able to develop on their own. This shared infrastructure lifts standards, reduces duplication, and ensures that safeguarding knowledge is both contemporary and consistent across the state, while still holding sectors accountable for embedding and sustaining training within their workforce.

Transformational Recommendation 1: Create a national child safeguarding training program

That the Australian Government auspice the development and delivery of a compulsory and consistent online, national training program. This training should cover:

- the responsibilities of workers and organisations for child safeguarding
- the identification of grooming behaviours (including the grooming of organisations, colleagues, parents and victims)
- best practice approaches to receiving and responding to disclosures from children.

The program should be evidence-informed, designed in collaboration with child protection experts, and delivered in a format accessible to the diverse workforce engaged in child-related roles.

Each state should make completion of the training a precondition for WWCC approval, with mandatory refreshers tied to WWCC renewal cycles. This should also extend to professions exempted from the WWCC scheme (including health and teachers). By embedding safeguarding education directly into the WWCC framework, the program would establish a consistent national baseline of knowledge and capability, regardless of jurisdiction or sector. This approach would address current fragmentation across states and territories, ensuring that every adult permitted to work or volunteer with children has received contemporary safeguarding training. This should occur ahead of, and not be dependent on, national harmonisation.

The Commonwealth's role should be to develop and fund the shared infrastructure for this training, while maintaining the expectation that organisations continue to provide context-specific safeguarding education relevant to their workforces. In this way, the national program functions as a foundation: lifting standards, reducing duplication, and guaranteeing consistency, while leaving space for sector-led initiatives that respond to particular risks and settings.

Operational Recommendation 3: Sustained investment in capacity building and community awareness

That the Queensland Government extend and expand its investment in child safeguarding capability through:

- Sector and Organisation Capacity Building Grants – extending the \$2 million per annum Child Safe Organisations Capacity Building grants program for a further three years, to ensure that organisations have the resources, training, and tools needed to embed the Child Safe Standards into their operations.
 - Community Awareness Campaign – re-funding the 2024–25 investment in the child safe community awareness campaign of \$1 million for the next three years, to build broad public understanding of child safeguarding and the identification of grooming to empower parents and carers, and create a culture where communities actively support safe organisations for children.
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Transformational Recommendation 2: Preventing threats to children from entering the workforce

The Australian and Queensland governments:

- identify specific industries, such as early childcare, residential care, disability care, youth justice and boarding facilities, where they will legislate:
 - penalties for both employees and employers who do not record their employment in employee registers; and
 - penalties for employees, employers and referees for failing to disclose past employment history; concerns, complaints or investigations about the employee regarding harm or risks to children; or the reasons that employment ended
 - amend the *Fair Work Act 2009* (Cth) and other industrial and workplace laws to provide explicit protection for employers who, in good faith and based on reasonable grounds, take adverse employment action (including suspension, role reassignment, or termination) due to concerns about a worker's potential risk to children.
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Transformational Recommendation 3: Create a Safeguarding Intelligence Hub

The Queensland Government establish a Child Safeguarding Intelligence Hub: a centralised, integrated platform to collect, analyse, and act on sub-threshold indicators of concern about individuals working with children. By linking organisational, regulatory, and community reports, applying analytical risk assessment techniques, and coordinating referrals with child protection and law enforcement, the hub will enable earlier identification of potential risks, enhance transparency and accountability, and break down information silos that currently impede proactive safeguarding. The government should ensure the Child Safeguarding Intelligence Hub is resourced with sufficient staff and technological capability to link, match and analyse data across the information silos relevant to child safety.

The operation of the Child Safeguarding Intelligence Hub should transform child safeguarding from a reactive investigation to proactive risk detection approach by integrating data from regulatory systems (blue card, Reportable Conduct Scheme, sector regulators, and other vulnerable persons registers), provide accessible reporting pathways for parents, staff, and volunteers, and apply advanced analytics to identify patterns of concern and threats to children. By doing so, it will enable earlier interventions, strengthen oversight, improve community trust, and prevent harm before it escalates.

The Child Safeguarding Intelligence Hub, should be designed to sit within a statutory or government-authorised entity with robust governance, secure technology infrastructure, skilled analysts, and clear ethical and legal frameworks. The hub would:

- collect and centralise sub-threshold reports from organisations, regulators, and communities
- analyse patterns of behaviour to detect emerging risks
- coordinate referrals to child protection and law enforcement
- provide feedback and training to reporters and stakeholders.

This integrated approach will seek to overcome fragmented information flows, strengthen systemic safeguarding, and enable proactive, intelligence-led protection of children.

Transformational Recommendation 4: Co-locate the reportable conduct and worker screening (WWCC) schemes into one entity

That the Queensland Government co-locate the Reportable Conduct Scheme, Child Safe Standards and the WWCC (worker screening scheme) within a single regulatory body and enable operational integration. Placing these schemes together in one organisational structure is intended to:

- eliminate silos by ensuring intelligence about individuals is shared seamlessly, reducing the risk of fragmented information
- enable consistent decision making on risk thresholds and worker suitability, as both schemes are interpreting and acting on the same evidence base
- strengthen collaboration by leveraging shared governance, culture, and leadership, which organisational design theory shows is far more effective than coordinating across separate entities
- improve efficiency and trust by giving families, organisations, and professionals a single point of contact, creating clarity and transparency in safeguarding oversight.

By embedding these functions within one organisation, Queensland will create a more integrated, accountable, and proactive safeguarding system that maximises the value of both schemes.

Operational Recommendation 4: Establish a legally authorised Child Safeguarding Intelligence Network

That the Queensland Government progress amendments to the *Child Safe Organisations Act 2024* to establish an effective Child Safeguarding Intelligence Network. This network should provide a formal legal framework and compulsion for cross-agency intelligence sharing that:

- transforms information into intelligence by empowering agencies to collate, analyse, and share insights that reveal patterns of risk and harm to children, overcoming the current fragmentation of raw data
- provides a legal foundation for proactive, not just reactive, sharing of relevant intelligence
- overcomes existing barriers—technological, organisational/cultural, and political/legislative—by setting common security standards, developing consistent protocols, and mandating interoperability of systems
- embed collaborative practice through clear governance arrangements, defined roles and responsibilities, and formal agreements between members
- foster a culture of trust and transparency where agencies are supported and incentivised to share intelligence in the interests of the safety of children, underpinned by workforce training and professional development
- enable networked or collaborative-centralised sharing models so that intelligence is accessible across multiple relevant entities, reducing 'linkage blindness' and silo effects
- give safe access to police intelligence, especially for cases that police have determined do not reach a criminal threshold, to decision makers in the WWCC and reportable conduct schemes.

A legislated Child Safeguarding Intelligence Network will provide Queensland with the capability to identify emerging threats, connect otherwise isolated threads of information, and ensure agencies can act on a shared, accurate picture of risk. It will transform the current information-sharing environment into a proactive intelligence system that strengthens the capacity of government and non-government organisations to protect children.

Operational Recommendation 5: Enable the integration of worker registers

That the Queensland Government lead structural reform by consolidating employee registers and enabling linkage or matching with the Working with Children Check (WWCC) register and the reportable conduct register. Existing state and federal employee registers should be incorporated into the scheme where possible, including the early child care worker register, disability worker register, teacher worker register and the proposed residential care worker register. This will provide a central point of accountability for worker screening and safeguarding intelligence. This reform should be supported by two critical sub-elements:

- Interoperability standards: Develop and adopt shared data standards and interoperability protocols across all worker registers relevant to child and vulnerable person safeguarding. This will enable timely information flow across systems and jurisdictions, ensuring that risks identified in one setting are visible to all others.
- National coordination mechanism: Advocate for, and actively participate in, the creation of a national safeguarding register clearinghouse with authority to reconcile clearance and misconduct information across states, territories, and sectors. This clearinghouse would ensure that adverse findings or suspensions in one jurisdiction or sector are automatically recognised and acted upon in others, eliminating loopholes and enabling intelligence-led prevention.

Operational Recommendation 6: Dedicated support for parents and workers to navigate complaint and reporting processes

That the Queensland Government ensure the Reportable Conduct Scheme is funded to meet demand, and that additional resources and authority is provided to enable the Reportable Conduct Scheme to establish dedicated support for parents, carers, workers, and volunteers to make and navigate complaints and reporting processes across organisations, regulators, and the police.

Operational Recommendation 7: Transparent ECRA investigations that uphold a parent's right to know

The Queensland Government should strengthen regulatory expectations and, where appropriate, legislated obligations, for ECEC services to inform parents and carers when a reportable conduct investigation is being undertaken that relates to a service provider or centre their child attends. This requirement should:

- ensure transparency while balancing privacy and procedural fairness
- encourage holistic, child-focused investigations that examine patterns, systemic issues, and environmental factors rather than treating incidents in isolation
- promote earlier disclosures from children, parents, and staff by fostering a culture where raising concerns is safe, valued, and acted upon
- replace practices that prioritise secrecy 'to avoid panic', which can limit accountability and inadvertently allow offenders to continue harmful behaviour.

Embedding this expectation will normalise transparency, reinforce organisational accountability, and strengthen the effectiveness of the Reportable Conduct Scheme, signalling that the safety of children is always paramount.

Operational Recommendation 8: Conduct a future evaluation of the reportable conduct and blue card schemes

That the Queensland Government conduct a comprehensive review of the state's key child safeguarding frameworks—including the risk-based Working with Children Check (blue card) system, the Child Safe Organisations Act, and the Reportable Conduct Scheme—in 2028-29. This review should assess whether recent reforms are operating as intended, identify any gaps or unintended consequences to the operation of the new schemes, and provide evidence-based recommendations for improvements to strengthen accountability, reduce risk, and ensure that the child safeguarding system effectively protects children across all sectors. With specific reference the review must:

- consider the operation of the blue card system within the broader safeguarding system
- consider the operation of the Reportable Conduct Scheme and its effectiveness in preventing, detecting and responding to child sexual abuse.

The review should assess scheme uptake, operational challenges, and whether its broad legislative definition supports timely detection, intervention, and organisational accountability for preventing, detecting and responding to child sexual abuse.

Operational Recommendation 9: Enable the use of police intelligence material for child safeguarding

The Queensland Government should legislate a clear obligation for police to share key contextual information from investigations that do not lead to a prosecution with a relevant child safeguarding authority (WWCC, reportable conduct or the child safeguarding body). This information should include details of complaints, observed behaviours, investigative findings, and other relevant contextual data. This obligation should ensure that:

- a decision not to prosecute does not result in lost intelligence or missed opportunities to identify threats and emerging risks
- a centralised safeguarding body—either BCS, the Reportable Conduct Scheme, or a dedicated child safeguarding entity—can assess risk, detect patterns, and take protective action that the police information, especially the information gained from child interviews, witness interviews and suspect interviews, is used to protect children

Implementing this requirement will strengthen Queensland's safeguarding system, close information gaps, and ensure that all available intelligence contributes to keeping children safe.

Operational Recommendation 10: Prioritising law enforcement resourcing—both personnel and technological

The Queensland and Australian governments take immediate action to ensure that law enforcement agencies have the resources, tools, and capabilities necessary to proactively protect children from sexual abuse and exploitation. Specifically:

1. **Resourcing frontline investigations:** The Australian Federal Police (AFP) and Queensland Police Service (QPS) should increase the capacity for Child Protection and Investigation Unit (CPIU) Joint Anti-Child Exploitation Teams (JACET) and Victim Identification Units to ensure timely and effective investigations, including the ability to execute more warrants and analyse electronic evidence without delay.
2. **Technological parity:** The Queensland and Australian governments should review and reform procurement, policy, and funding arrangements to ensure police departments have rapid access to technology and analytical tools equivalent to, or ahead of, those used by perpetrators of child sexual abuse. This must include AI-assisted analysis, digital forensics software, and secure cloud storage solutions.
3. **Integrated safeguarding approach:** These measures should be part of a broader, coordinated strategy to embed law enforcement as a fully supported pillar within Queensland's child safeguarding system, complementing regulatory, oversight, and intelligence mechanisms.

Both governments should publish this resourcing to ensure that organisational drift does not occur and that the public can monitor changes in resourcing over time.

Transformational Recommendation 5: Strengthen child safeguarding duties and introduce corporate and personal accountability and liability for the safety of children

That the Australian Government commence a national reform to strengthen and harmonise child safeguarding laws across jurisdictions, embedding corporate responsibility and liability for child safety in the same way that Work Health and Safety laws now apply to worker safety so that Commonwealth laws include enforceable corporate duties of care for child safeguarding, and significant penalties for organisations, their board and their leaders where safeguarding failures result in sexual abuse or exploitation or expose children to serious risk of harm. Such a scheme is to include the appointment of child safeguarding officers in medium sized organisations and above, and the explicit inclusion of child safeguarding within risk management plans and performance reporting.

While this occurs the Queensland Government should strengthen its own state-based legislation, including the *Child Safe Organisations Act 2024*, to introduce the above corporate and personal liabilities, duties and incentives for boards, owners, and workers to implement safeguarding practices as a requirement for operating a child-related business.

Transformational Recommendation 6: Improved interviewing and responses when victim-survivors present

The Queensland Government improve its response to victims of child sexual abuse through the adoption of principles and approaches aligned with the Child Advocacy Centre and Barnhaus models. This new approach should ensure that victim-survivors of child sexual abuse (and their parents or guardians) are protected and supported, and that any further trauma throughout the justice process is minimised. This investment should include piloting a specific Child Advocacy Centre or Barnhaus service at multiple sites in Queensland.

Transformational Recommendation 7: Increasing the rights of child sexual abuse victim-survivors in cases of child exploitation material

The Queensland and Australian governments both implement legislative reforms to enable the use of victim impact statements in cases involving CEM ensuring that these statements are attached to the specific images and are admissible in all related legal proceedings regarding those images. This approach would allow victim-survivors to provide their impact statements once, while ensuring that each perpetrator hears their voice.

Furthermore, both the Queensland and Australian governments should introduce legislative reforms that enable the use of community impact statements in CEM cases.

Queensland and Australian governments should collaborate with international partners to establish mechanisms that:

- allow victim-survivors from other countries to submit victim impact statements in cases where Australian perpetrators are charged with accessing, possessing or distributing CEM depicting them. This could be facilitated through intermediaries such as Project Arachnid, ensuring that the voices of international victim-survivors are heard and considered in Australian courts
 - allow Australian victim-survivors to submit Victim Impact Statements for use in international jurisdictions where perpetrators are charged with accessing, possessing, or distributing material depicting Australian children. These statements could be submitted through intermediaries such as Project Arachnid or other appropriate mechanisms, ensuring that the voices of Australian victim-survivors are heard and considered in foreign courts.
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Operational Recommendation 11: Investing in the tracking and takedown of images of Australian victim-survivors

That the Australian Government either enter a formal partnership with Project Arachnid or invest in a similar initiative within Australia (under the leadership of the eSafety Commissioner or the Australian Centre to Counter Child Exploitation) to combat the proliferation of CEM and protect the future rights of Australian children who have been abused.

Operational Recommendation 12: Improved specialist support services for victim-survivors and their families

The Queensland Government undertake a review of its current investment in sexual abuse counselling and support services, and establishes a centrally coordinated, dedicated funding allocation specifically for responding to child sexual abuse. This funding should ensure:

- trauma counselling is available to children and parents at the point of disclosure and throughout court processes
- adolescent mental health support is accessible for children as they transition into adolescence
- adult survivors of child sexual abuse have access to ongoing therapy and support across their life-course in acknowledgement that the impact of child sexual abuse can reappear at key life events
- eligibility criteria and service coverage are equitable, removing postcode, age, or relational barriers that currently limit access
- investment is strategically coordinated across agencies to create a seamless, statewide network of trauma-informed services, replacing the current fragmented patchwork.

This approach will embed lifelong, consistent support for victim-survivors and families, and strengthen Queensland's overall child safeguarding framework.

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

That the Queensland Government funds 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.

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 with a specific focus 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.

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.

Transformational Recommendation 8: Establish robust and centralised national and state governance for child safeguarding

To ensure the protection of children from abuse and neglect is treated as a matter of the highest national priority, it is recommended that the Australian and Queensland Governments immediately establish dedicated and enduring governance mechanisms for children and child safeguarding. This must include:

- formally establishing clear Ministerial accountability and a permanent Ministerial Council on Child Safeguarding as a standing committee of National Cabinet, providing a cross-jurisdictional mechanism for driving coordinated national policy, sharing critical intelligence, and progressing nationally consistent child safeguarding legislation and systemic reform, including the outstanding recommendations from the Royal Commission
- making the safety of children an explicit priority within the Queensland Cabinet process (by establishing a dedicated Cabinet Sub-committee charged with overseeing the state's responses to child abuse and neglect, ensuring accountability across portfolios, and embedding a whole-of-government approach to preventing harm and supporting recovery).

This governance reform is essential to elevate child safeguarding to a national and state leadership level, enable urgent system improvements, and ensure that past failures to protect children are not repeated.

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.

Operational Recommendation 18: Produce a clear long-term strategy for the protection of children

That the Queensland Government develop and implement a long-term child-centred safeguarding strategy that places the safety of children at the centre of government planning and decision making. The strategy should:

- be framed on the prevent, detect, respond and support themes emerging from this report
- integrate intelligence, oversight, prevention, and response across all relevant government departments, regulators, and programs
- recognise the critical role of parents, caregivers, and communities in protecting children and strengthening protective environments
- shift the focus from children as secondary participants to active consideration of emerging threats, including sexual abuse, exploitation, neglect, and systemic risks
- embed clear accountability and leadership mechanisms to ensure coordination, transparency, and continuous improvement across the child safeguarding system
- be adaptive and evidence-informed, incorporating emerging research, technological change, and evolving social contexts to ensure enduring effectiveness
- promote a culture of proactive prevention, early intervention, and continuous learning, ensuring children's safety remains a central and measurable outcome across all government functions.

This strategy should serve as a generational blueprint for child safeguarding in Queensland, replacing fragmented, short-term approaches with a sustained, coordinated, and accountable framework designed to protect children from harm into the future.

Operational Recommendation 19: Engaging young people, victim-survivors and experts in strategy and resource development

That the Queensland Government establish an Expert Advisory Panel of young people and individuals with lived experience of child sexual abuse to inform the development, implementation, and ongoing evaluation of the Child Safeguarding Strategy. The panel should:

- be actively involved in shaping strategy priorities, policies, and programs
 - provide insights on emerging risks, reporting pathways, and effective prevention and intervention approaches
 - operate with appropriate safeguards, support, and recognition of participants' wellbeing
 - ensure lived experience informs decision making at all stages, creating a child- and victim-survivor-centred approach
 - contribute to the evaluation of the strategy's effectiveness, providing feedback on its relevance, accessibility, and impact from the perspective of young people and victim-survivors.
 - Engaging this panel will ensure that Queensland's child safeguarding system is authentic, accountable, and responsive to the needs and realities of those it is designed to protect.
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Transformational Recommendation 9: Establish a safeguarding entity

That the Queensland Government legislate to establish a new safeguarding entity to provide a central point of leadership, accountability, and coordination for child and vulnerable person safeguarding. This entity should consolidate related regulatory and safeguarding functions and act as the system's intelligence hub, ensuring Queensland moves from fragmented responses to a unified, proactive safeguarding system.

By addressing these areas, systems can bridge the gaps that currently compromise the safety of children. An integrated approach ensures that all levels of society are working together towards the common goal of preventing and responding to child sexual abuse.

Endnotes

- 1 Tasmanian Government, Who was looking after me? Prioritising the safety of Tasmanian children, Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings, 2017.
- 2 Community and Disability Services Minister's Conference, Adelaide [media release], Australian Government, 4 June 2010, accessed 17 September 2025.
- 3 Department of the Prime Minister and Cabinet, National Cabinet priorities, Australian Government, 2024.
- 4 Department of Prime Minister and Cabinet, Ministerial Councils, Australian Government, n.d., accessed 17 September 2025.
- 5 B Shorten and J Macklin, Community and Disability Services Minister's Conference, Adelaide [media release], Australian Government, 4 June 2010, accessed 17 September 2025.

