Second Action Plan under the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030

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Introduction

I welcome the opportunity to contribute to the development of the Second Action Plan to Prevent and Respond to Child Sexual Abuse.

As Chair of the Queensland Child Death Review Board, I delivered *In Plain Sight* in December 2025. Commissioned by the Queensland Government, this systemic review examined institutional and cross-system responses to child sexual abuse and made 28 recommendations, including ten directed to the Australian Government. These 10 recommendations call for a national safeguarding system built around prevention, intelligence, governance, workforce capability, accountability and stronger support for victim-survivors

The *In Plain Sight* review found that focusing on individual sectors will never be enough if the systems around children remain fragmented. Children move between services. Offenders move between organisations. Information remains siloed. Accountability is dispersed. Opportunities to prevent abuse continue to be missed, and it is no one's job to detect threats to our children.

To be very clear, the sexual abuse of children in Australia is a national crisis.

While I note the Federal Education Minister has announced major reforms to the early childcare sector, Australian's need to be honest – this isn't an early childcare issue. It is not an education issue. It is not a child protection issue. It is a whole-of-society issue. That is why *In Plain Sight* made 10 recommendations requiring Commonwealth leadership. The very first one calls for the Commonwealth to respond clearly to the report.

That response is overdue.

Drawing on the Commission's evidence, the Queensland Child Death Review Board's annual reporting, *In Plain Sight* and relevant national evidence, this submission focuses on gaps in worker screening, information sharing, safeguards for children in care and children with disability, and organisational accountability. Queensland's proposed safeguarding reforms, including the Queensland Protection Commission and Child Safeguarding Intelligence Hub, provide one example of a more coordinated, intelligence-led approach. The reforms are still being developed and are not presented as a directly transferable national model.

If Australia is serious about preventing child sexual abuse - not simply responding after harm has occurred - we must build a safeguarding system that is coordinated across every jurisdiction, every sector and every place where children live, learn, play and receive services.

Australian Children deserve nothing less.

Regards

Luke Twyford
Queensland Family and Child Commissioner
Chair of the Queensland Child Death Review Board

The inadequacy of worker screening consistency and the promise of a child safeguarding intelligence hub

The National Strategy's commitment to enhance national arrangements for sharing child safety and wellbeing information across jurisdictions and sectors is welcome, but is not sufficient.

In Plain Sight made two profound findings relating to worker screening. The first is that our working with children check (WWCC) schemes are inadequate at detecting threats to children; the community expectations of what these functions achieve is far from their operational potential. At all times that our notorious offender was offending he was legally entitled to a working with children card – continuing to rely on and add to this system therefore misses the fundamental design fault that it is not the only, and cannot be the only, safeguard for our children.

Secondly, it was clear that fragmented systems allow critical information to remain confined within individual organsiations and individual schemes. A national mechanism should enable relevant authorities to identify and respond to risk, sectors and child-facing roles.[1] This requires corporate accountability, government support, and changes to employment law.

The Second Action Plan should establish nationally integrated arrangements for the timely exchange of worker-screening, misconduct and safeguarding information – and more importantly progress proactive threat detection work as outlined from page 288 of *In Plain Sight*.

Theme 1 of the First Action Plan includes a measure to "enhance national arrangements for sharing child safety and wellbeing information" across jurisdictions and sectors (M3).[2] However, the Board's findings in *In Plain Sight* are clear that reforms concentrated within individual sectors or jurisdictions may displace, rather than reduce, risk. Sustained reductions in child sexual abuse require coordinated, cross-jurisdictional and cross-sector responses. Fragmented reform, however well-designed within a single sector, will leave critical gaps between systems.[3]

Child Safeguarding Intelligence

Australia's child safeguarding system is primarily designed to respond once statutory or regulatory thresholds have been reached. Police investigate criminal offences. Regulators assess legislative requirements. Employers conduct workplace investigations. Child protection agencies respond where statutory intervention is required. Each performs an important function, but none has responsibility for bringing together disparate information to assess emerging risks to children before serious harm occurs.

This creates a significant gap in Australia's safeguarding system. Individuals who pose a risk to children frequently come to attention through multiple low-level concerns rather than a single report of serious abuse. Boundary violations, inappropriate comments, repeated complaints, unexplained changes in behaviour, frequent movement between organisations and unsuccessful workplace investigations may each appear insignificant in isolation. Collectively, however, they can reveal grooming behaviours, escalating risk or patterns that warrant intervention.

Current systems are not designed to identify these patterns. Information is dispersed across employers, professional regulators, Working with Children Check schemes, Reportable Conduct Schemes, complaints mechanisms, law enforcement and community reports. Each organisation assesses information for its own legislative purpose and threshold. Few mechanisms exist to aggregate intelligence across agencies or to identify emerging risks before abuse occurs. As one interstate Reportable Conduct Scheme manager observed:

> *"Someone needs to take ownership for the holistic assessment of risk. Police, regulators and employers all have different thresholds and different purposes. The gap is who actually puts it all together."*

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[1] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 304. **https://www.qfcc.qld.gov.au/sites/default/files/2025-12/report-csa-in-plain-sight-web.pdf**.
[2] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030* (Canberra: Australian Government, 2025), 34 **https://www.childsafety.gov.au/system/files/2025-05/national-strategy-prevent-and-respond-to-child-sexual-abuse-2021-2030.pdf**.
[3] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 460, 466.

An intelligence-led safeguarding model would address this gap by shifting the focus from isolated incidents to cumulative risk. Rather than waiting for evidence sufficient to establish criminal offending or regulatory action, an intelligence capability would identify, assess and analyse patterns of concerning behaviour across multiple sources. This would enable agencies to detect emerging threats earlier, support timely interventions and better protect children from preventable harm. Importantly, such an approach does not replace existing investigative or regulatory functions. Rather, it complements them by providing a whole-of-system understanding of risk and ensuring that relevant intelligence reaches the agencies best placed to act.

Establishing a Child Safeguarding Intelligence Hub

To achieve this, Australia should establish a **Child Safeguarding Intelligence Hub**—a multidisciplinary capability responsible for collecting, analysing and sharing safeguarding intelligence across regulatory and law enforcement systems. The Hub would receive and analyse information from multiple sources, including:

- Reportable Conduct Scheme notifications;
- Working with Children Check and Blue Card information;
- Child Safe Organisation regulatory activities;
- complaints and misconduct reports;
- law enforcement intelligence;
- information provided by employers, parents and members of the community; and
- intelligence shared by other regulators and jurisdictions.

Rather than assessing each report in isolation, the Hub would identify cumulative patterns of concern, emerging trends and individuals who may present an escalating risk to children. This intelligence could then be provided to the relevant regulator, employer or law enforcement agency to inform operational decisions, investigations or regulatory action. The Hub would not determine criminal guilt. Its purpose would be to support earlier detection, disruption and prevention by ensuring that fragmented intelligence does not remain fragmented.

Evidence supporting an intelligence-led approach

This proposal is consistent with a growing body of national evidence. The 2023 ACECQA *Review of Child Safety Arrangements* recommended establishing a nationally coordinated intelligence mechanism capable of recording and sharing safeguarding information across authorised agencies. It concluded that safeguarding should adopt a risk-based approach that prioritises children's safety rather than relying solely on substantiated findings.

Similarly, the 2025 Victorian *Rapid Child Safety Review* recommended creating a shared intelligence and risk assessment capability linking the Working with Children Check system and the Reportable Conduct Scheme. It recognised that information currently dispersed across multiple agencies must be brought together so that specialist staff can assess cumulative risk and support timely decision-making.

Submissions to the *In Plain Sight* Review echoed the same conclusion. Halloran Morrissey Group observed that a single safeguarding authority overseeing employment screening, Reportable Conduct Schemes and Child Safe Standards would be better placed to identify patterns across notifications and provide organisations with a more streamlined and effective safeguarding system. Research commissioned from the Australian Institute of Family Studies reached a similar finding. It concluded that safeguarding systems are most effective when regulators operate as an interconnected network rather than isolated entities, sharing information, intelligence and consistent approaches to risk assessment. Taken together, this evidence demonstrates a growing national consensus that Australia's safeguarding system requires stronger intelligence capability, integrated information sharing and coordinated risk assessment.

Child sexual abuse prevention requires more than responding effectively after abuse has occurred. It requires systems capable of identifying threats before children are harmed.

The establishment of a Child Safeguarding Intelligence Hub would represent a fundamental shift from reactive regulation towards intelligence-led prevention. It would strengthen information sharing, connect currently fragmented sources of intelligence and provide governments with an integrated understanding of emerging safeguarding risks. Most importantly, it would ensure that no single agency is left attempting to assess risk using only part of the available picture.

The concept of intelligence-led safeguarding builds on established policing and security models where multiple information sources are integrated, analysed, and used proactively to detect threats before harm occurs. An intelligence hub dedicated to child safeguarding would adopt such a model—collecting a broad spectrum of concerns, applying analytical techniques to identify risk patterns, and enabling coordinated responses.

The Second Action Plan should establish a national mechanism capable of connecting relevant worker-screening, misconduct and safeguarding information across jurisdictions and sectors. The proposed Queensland Child Safeguarding Intelligence Hub, subject to legislation and detailed implementation arrangements, illustrates the type of coordination needed to address these threat detection gaps. It is intended to connect information held across worker-screening, reportable-conduct and child-safe-organisation systems and support earlier identification, assessment and referral of safeguarding risks.

A national clearinghouse would extend the reach of information already being generated at the state level, rather than requiring new categories of data collection.[4]

National Cabinet and governance

Preventing and responding to child sexual abuse requires coordinated action across justice, policing, education, health, child protection, disability, digital safety and community services. No single agency or level of government can address these risks alone. Effective prevention depends on governments working together through clear governance arrangements, shared accountability and sustained leadership.

Australia's federal system provides opportunities for innovation and locally tailored responses, but it also creates fragmentation. Responsibilities for child safeguarding are dispersed across Commonwealth, state, territory and local governments, with further complexity arising from independent regulators, statutory agencies and non-government organisations. While this distribution of responsibilities is appropriate, children should not experience different levels of protection because of jurisdictional boundaries.

The *Royal Commission into Institutional Responses to Child Sexual Abuse* identified fragmented governance and inconsistent legislative approaches as significant barriers to protecting children. It recommended nationally consistent Child Safe Standards, improvements to Working with Children Checks and stronger collaboration between governments. These recommendations recognised that perpetrators do not operate within administrative boundaries and that safeguarding systems must be equally connected.

National consistency does not require every jurisdiction to operate identically. Rather, it requires governments to work towards common outcomes through shared standards, coordinated oversight, consistent legislation where appropriate and effective information sharing. Children should experience the same commitment to safety regardless of where they live or which organisation they engage with.

The Commonwealth's leadership role

Although states and territories retain primary responsibility for child protection, policing, education and health, the Commonwealth occupies a unique leadership position. It is responsible for Australia's international obligations under the United Nations Convention on the Rights of the Child, legislates for Commonwealth child sexual abuse offences including online exploitation and transnational offending, and has the convening power to coordinate national reform.

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[4] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 305.

Following the Royal Commission, Australia established important national safeguarding institutions, including the National Office for Child Safety, the Australian Centre to Counter Child Exploitation, the eSafety Commissioner and strengthened Australian Federal Police capabilities. Together these organisations provide national leadership across policy, intelligence, online safety, criminal investigations and prevention. The Commonwealth also funds and coordinates major national strategies, including *Safe and Supported: The National Framework for Protecting Australia's Children*, the *National Plan to End Violence Against Women and Children* and the *National Disability Strategy*. These initiatives demonstrate that the Commonwealth already plays a central role in child safeguarding. The challenge is ensuring these efforts operate as an integrated system rather than a collection of parallel initiatives.

National leadership is therefore not about assuming state responsibilities. It is about providing strategic direction, establishing consistent expectations, coordinating reform and ensuring accountability across jurisdictions.

Governance structures alone do not protect children. Leadership does. Every major inquiry into child sexual abuse has demonstrated that abuse rarely occurs because policies are absent. More commonly, abuse occurs because leaders fail to prioritise child safety, fail to act on warning signs or fail to create cultures in which concerns are identified and addressed.

Leaders establish organisational priorities through the decisions they make, the resources they allocate and the behaviours they model. Where child safeguarding is viewed as a compliance obligation rather than a core organisational responsibility, risk becomes fragmented, concerns remain unreported and opportunities to prevent abuse are missed. The Tasmanian Commission of Inquiry observed that some of the greatest harms arose not from the absence of policy, but from failures of leadership. It identified examples of leaders lacking curiosity, avoiding accountability, delegating responsibility or responding defensively when concerns were raised. Such behaviours not only fail children directly but also discourage others from speaking up, weakening safeguarding culture across organisations. Effective safeguarding therefore requires leaders who are child-centred, accountable and committed to continuous improvement. Leadership capability should be recognised as a core safeguarding competency alongside organisational policies, workforce screening and regulatory compliance.

Australia has made significant progress implementing the Royal Commission's recommendations: Child Safe Standards have now been adopted nationally, information-sharing arrangements continue to improve, and governments have invested substantially in prevention initiatives. Despite these reforms, governance remains dispersed.

Since the transition from the Council of Australian Governments to National Cabinet, responsibility for children's issues has become increasingly distributed across multiple ministerial portfolios. Child safeguarding now intersects with health, education, justice, disability, women's safety, housing, *Closing the Gap* and digital policy. While each portfolio has legitimate responsibilities, no single national governance mechanism provides comprehensive oversight of child safeguarding.

This fragmentation creates practical consequences. It becomes more difficult to identify emerging national risks, coordinate reform, monitor implementation across jurisdictions and ensure consistent accountability. Child safeguarding competes with broader policy priorities rather than being recognised as a national priority in its own right. If governments consistently describe children as Australia's highest priority, governance arrangements should reflect that commitment.

Australia would benefit from stronger national governance arrangements that provide:

- clear national leadership for child safeguarding;
- defined accountability for cross-jurisdictional reform;
- coordinated implementation of national safeguarding strategies;
- consistent monitoring of outcomes and emerging risks; and
- mechanisms to resolve legislative and operational inconsistencies between jurisdictions.

Such a model would not diminish state and territory responsibilities. Rather, it would strengthen Australia's ability to respond collectively to emerging threats while preserving local flexibility in service delivery.

Establish robust and centralised national and state governance for child safeguarding.

Children are frequently described as Australia's highest priority. Yet responsibility for safeguarding them remains dispersed across numerous portfolios, agencies and jurisdictions, with no single governance mechanism responsible for driving national coordination and accountability. Effective child safeguarding requires governance arrangements that mirror the priority governments place on children. National leadership should provide strategic direction, coordinate reform, monitor implementation and ensure accountability across jurisdictions, while respecting the operational responsibilities of states and territories.

Preventing child sexual abuse requires more than shared responsibility. It requires clear accountability and precise coordination. Only through visible leadership, coordinated governance and sustained national commitment can Australia create a safeguarding system that is coherent, consistent and capable of preventing abuse before it occurs.

The failure of National Cabinet to recognise its role in child safeguarding

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.

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

The absence of "children" in the list of national priorities is stark.

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. Centering 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.

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.

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.

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.

The Second Action Plan should establish specific and clearer cross-portfolio Commonwealth governance, ministerial accountability and public reporting arrangements so that responsibilities timeframes and outcomes for the prevention, detection and response to child sexual abuse can be tracked nationally.

This distributed model contrasts with Queensland's recent shift toward centralised safeguarding governance. Alongside the Queensland Protection Commission described above, the Queensland Government has established a dedicated Child Safety Cabinet Committee to oversee transformational reforms across every government department.[5]

[5] Queensland Government response to *In Plain Sight*, 16 June 2026, https://www.justice.qld.gov.au/initiatives/qg-response-in-plain-sight-review

These reforms reflect a model in which child safety receives standing, centralised executive attention distinct from its treatment within a broader violence-prevention agenda.

Following its year-long review into child sexual abuse, the Queensland Child Death Review Board recommended in December 2025 that:

> *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:*
>
> 1) *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 In Plain Sight: Review into System Responses to Child Sexual Abuse* | *Part G: Safeguarding the future*
> 2) *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.*[6]

It is time for the Government to act on this recommendation.

Corporate accountability and duty of care (TR5)

While the National Strategy has established important foundational services and supports, it lacks the strength of a high-accountability legal framework. Theme 1's National Principles for Child Safe Organisations (Measure 1) and the national annual reporting framework (Measure 2) build transparency and reporting mechanisms, but reporting on child-safe culture is distinct from a legislated duty with consequences for non-compliance.[7]

One of the most difficult issues identified by *In Plain Sight* arises when credible safeguarding concerns exist but cannot be substantiated to a criminal, regulatory or employment standard. In these circumstances, organisations face an impossible choice – they may retain an individual despite credible concerns, potentially exposing children to unacceptable risk, or take employment action and face significant legal challenge under industrial relations legislation.

The Review identified numerous examples where organisations instead chose a "quiet exit". Individuals were encouraged to resign, not confirmed during probation, made redundant or simply allowed to leave without any meaningful recording or sharing of safeguarding concerns. Rather than managing risk, organisations effectively transferred it to another employer. **This approach protects organisations more effectively than it protects children.**

Importantly, an inability to substantiate an allegation does not mean abuse did not occur. Child sexual abuse is inherently difficult to detect and prosecute. Victim-survivors often delay disclosure, evidence is frequently limited and many offences occur in circumstances where corroboration is impossible. Waiting until criminal or disciplinary thresholds are met will inevitably leave some children exposed to preventable harm.

Organisations therefore require a legal framework that enables them to take reasonable, proportionate safeguarding action where credible concerns exist, while maintaining procedural fairness and appropriate oversight.

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

[7] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 38.

Learning from work health and safety

Over the past two decades Australia has fundamentally transformed workplace safety. Work health and safety (WHS) legislation moved beyond responding to workplace injuries after they occurred and instead imposed positive duties on organisations and their officers to identify, eliminate and manage foreseeable risks before harm occurs. This reform changed organisational behaviour. Safety became a governance responsibility rather than simply an operational issue. Boards became accountable, executives became personally responsible for due diligence, risk management became embedded in organisational decision-making and significant penalties created powerful incentives for prevention.

Today, no organisation would argue that workplace safety should depend solely upon proving negligence after someone has been seriously injured. Child safeguarding should be approached with the same philosophy.

A long-term strategy for child safeguarding must therefore chart the same course that WHS has taken: from fragmented and reactive to harmonised, preventative, and universally accountable. This is not only possible, but necessary if we are to create a society where children are as safe in their communities, schools, and organisations as workers are now expected to be in their workplaces.

Central to prioritising child safety will necessarily be new penalties for organisations and leaders who oversee processes that lead to harm. Severe consequences for non-compliance are central to shifting organisational behaviour, including leadership accountability, board oversight, insurance costs, and preventive systems. Significant cases and statistics from the WHS system stand in stark contrast to the current penalties available to organisations with weak safeguarding practices, who fail to detect, and respond to perpetrators of child sexual abuse, and prevent their employment.

Children are exposed to foreseeable risks within organisations. Those organisations are best placed to identify, assess and manage those risks. Where they fail to do so, accountability should extend beyond individual offenders to include organisational and leadership failures that allowed abuse to occur.

In the absence of evidence to support an allegation which would warrant a report to a regulator or the Queensland Police Service (QPS), or which is sufficient enough to substantiate a breach of a staff code of conduct, employers are left with having to face the industrial consequences of dismissing a worker or allowing them to continue, potentially in close contact with children. The prioritisation of an organisation's reputation, a fear of defamation and legal risks to organisations and individuals may act as a deterrent to raising or sharing concerns about a person of concern, particularly where complaints have not been substantiated.

As discussed in more detail in Part C, there were multiple instances where the offender did not pass probation in the centres that he worked in, or where he was terminated, offered a redundancy, asked not to return and/or dismissed immediately. In most centres there was very limited information available as to why the offender's employment was ceased. The Board identified that this was potentially indicative of centres seeking to 'move a problem on' rather than taking decisive action against the offender.

The Second Action Plan should progress nationally consistent reforms to employment and industrial-relations laws that protect employers who, acting in good faith and on reasonable grounds, take proportionate adverse action to manage a worker's potential risk to children. It should also examine enforceable duties relating to the disclosure of relevant safeguarding and employment information.

The National Strategy has established important foundations through the National Principles for Child Safe Organisations and national reporting arrangements. These initiatives strengthen capability and encourage better safeguarding practice. However, they do not establish an enforceable duty to protect children comparable to duties that exist under work health and safety legislation. *In Plain Sight* found that safeguarding is still too often treated as an administrative compliance exercise rather than a core governance responsibility. If governments genuinely expect organisations to prevent child sexual abuse, boards and senior executives should carry clear legal responsibilities to establish safe organisational cultures, identify foreseeable risks and respond decisively to safeguarding concerns.

Significant organisational failures that expose children to serious risk should attract meaningful regulatory and legal consequences. As has occurred in work health and safety, strong accountability settings influence governance, insurance markets, organisational investment and leadership behaviour. They create powerful incentives to prevent harm before it occurs.

Achieving this approach also requires reform of employment and industrial relations frameworks. Employers acting in good faith and on reasonable safeguarding grounds should be better protected when taking proportionate action to manage risks to children. Current legal settings can discourage organisations from acting where concerns cannot be substantiated to a disciplinary threshold, even when safeguarding risks remain.

The Second Action Plan should therefore progress nationally consistent law reforms that:

- protect employers who take reasonable safeguarding action in good faith;
- strengthen requirements to disclose relevant safeguarding information between employers where appropriate;
- improve information sharing between safeguarding regulators; and
- ensure employment law better supports child protection while preserving procedural fairness.

Transformational Recommendation 5 of *In Plain Sight* titled, "**Strengthen child safeguarding duties and introduce corporate and personal accountability and liability for the safety of children**" called for:

> *That the Australian Government commences 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.*

It is time for the Australian Government to respond to this recommendation.

Education and training

Mandatory and consistent safeguarding education across child-facing sectors

The First Action Plan recognises education and capacity building as important elements of prevention. However, the available evidence indicates that safeguarding education remains inconsistent across child-facing sectors and is often narrowly focused on mandatory reporting rather than identifying and responding to risks within organisations. The Second Action Plan should establish minimum national expectations for evidence-based safeguarding education, induction and regular refresher training.

Theme 1 includes measures to implement and promote the National Principles for Child Safe Organisations (Measure 1), and to support resources for teachers and children on wellbeing, relationships and safety, including appropriate, inappropriate and unlawful sexual behaviour (Measure 4). Theme 1 (Measure 5) also commits governments to work with the future National Centre on education and capacity-building measures for children, parents, professionals and tertiary students.[8]

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[8] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 38-39.

Evidence from *In Plain Sight* indicates that despite the National Principles' standards, the implementation of continual education and training remains flawed. This training is largely piecemeal and narrowly focused on mandatory reporting concerns regarding parents rather than threats within institutional settings.[9] This appears to reflect an implementation gap rather than a design gap: the measures exist but are not delivered consistently or universally in practice.

The Second Action Plan should examine practical mechanisms for ensuring safeguarding knowledge remains current. This could include linking evidence-based refresher education to Working with Children Check renewal or another nationally consistent compliance point. Any such approach should complement, rather than replace, organisations' responsibility to provide role-specific induction, supervision and continuing education.[10] The same implementation gap extends to recruitment and supervision practices: the National Principles require child safe recruitment and ongoing supervision (Principle 5)[11], covering screening, induction and proportionate supervision, but as with training delivery, rigour in applying these standards varies, particularly among smaller or volunteer-reliant organisations.

Dedicated grooming awareness training: lessons from *Grooming Hides Behind Harmless*

The National Strategy defines grooming precisely, including both in-person and online forms, and identifies its function as gaining access to a child, obtaining compliance, maintaining silence, and avoiding discovery of abuse. Theme 1 of the First Action Plan responds to this broader prevention objective through Measure 6, which commits to a national awareness campaign to help people recognise and respond to the warning signs of child sexual abuse.[12] However, In Plain Sight evidence indicates that greater public awareness of grooming does not necessarily translate into an ability to identify it in practice. While 75 per cent of survey respondents acknowledged that grooming is always a form of child sexual abuse, the same evidence suggests the public struggles to identify the known behavioural indicators that may indicate that grooming is occurring.[13]

This gap is reflected directly in the Commission's own engagement with lived experience through Bravehearts' *Grooming Hides Behind Harmless* campaign, a public awareness initiative specifically targeting the subtle, manipulative behaviours perpetrators use to groom children and their parents. Amelia, a Bravehearts Youth Ambassador and member of the Bravehearts Youth Advisory Council, contributed lived experience evidence to the Commission's review of system responses to child sexual abuse and its work on child safe organisations.

The Second Action Plan provides an opportunity to commit to a dedicated grooming-recognition component, distinct from general child sexual abuse awareness, building on this existing lived-experience partnership.

eSafety and proactive removal of child sexual abuse material

Image tracking and takedown

Theme 4 of the First Action Plan focuses on strengthening national capability for offender identification and evidence gathering. Its measures include embedding state, territory and New Zealand police within the AFP-led Australian Centre to Counter Child Exploitation (ACCCE) (Measure 17), establishing a National Victim Identification Framework for online child sexual abuse (Measure 18), implementing a Digital Field Triage Tool and Training Program (Measure 19), and developing a victim coordinator liaison capability (Measure 20).[14]

ACCCE already provides Australia's central law enforcement response to online child sexual exploitation, using the combined expertise of law enforcement, government, non-government agencies and industry.[15]

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[9] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 248.
[10] Ibid, 254.
[11] Australian Human Rights Commission, *National Principles for Child Safe Organisations*, Principle 5.
[12] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 39, 59.
[13] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 245.
[14] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 35.
[15] ibid, 28.

Theme 4's measures strengthen ACCCE's investigative and identification functions. However, none of these measures establish a dedicated, proactive mechanism for the large-scale detection and removal of child sexual abuse material (CSAM) hosted internationally, a distinct function from investigation and victim identification.

International models illustrate what such a mechanism looks like in practice. Project Arachnid, operated by the Canadian Centre for Child Protection, uses image and video hashing technology to detect and issue takedown notices for CSAM at scale, and has issued tens of millions of removal notices to online service providers across nearly 100 countries.[16] Project Arachnid provides a useful example, although the most appropriate model for Australia would need to be determined nationally.

The Second Action Plan should strengthen Australia's capacity to proactively detect, disrupt and remove child sexual abuse material at scale. This should include consideration of the respective roles of the eSafety Commissioner, ACCCE, law-enforcement agencies, technology providers and international partners, informed by established models such as Project Arachnid.

Children's voice and complaints accessibility

The National Principles for Child Safe Organisations include, as distinct principles, that children and young people are informed about their rights and participate in decisions affecting them (Principle 2), and that complaints processes are child-focused, accessible and understood by children themselves (Principle 6).[17] No measure under the First Action Plan specifically addresses whether complaints mechanisms are designed to be genuinely accessible and usable by children themselves, as distinct from the adults responsible for them.

Children have a right to be heard and to access complaints processes they can understand and use safely. The Second Action Plan should include a dedicated measure requiring child-facing organisations to design, test and evaluate complaints and disclosure mechanisms with children and young people. Particular attention should be given to children in residential care, children with disability, Aboriginal and Torres Strait Islander children, and children who communicate in different ways.

Priority Cohorts

Gaps in worker-screening information sharing can have serious consequences for children in care and children with disability. Fragmented information-sharing arrangements can prevent relevant disciplinary, screening and safeguarding information from following individuals when they move between employers, sectors or jurisdictions.

The Commission of Inquiry into Queensland's Child Safety System's final report *From Pressure to Purpose* found that approximately 67 per cent of reported sexual abuse incidents involving children in care occur in residential placements, and 40 per cent of all reported instances occurred while the child was absent from placement.[18] The Board's findings in *In Plain Sight* identify that children with a disability are 3.4 times more likely to be subjected to sexual abuse than their peers without disability, which *In Plain Sight* attributes in part to barriers to disclosure and increased dependency on carers, among other contributing factors.[19] *In Plain Sight* recommends strengthening NDIS screening arrangements specifically by linking screening databases with the WWCC and the Reportable Conduct Scheme.[20]

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[16] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 385-390.
[17] Australian Human Rights Commission, *National Principles for Child Safe Organisations* (Canberra: Australian Government, 2019), Principles 2 and 6, **https://humanrights.gov.au/resource-hub/resources-for-organisations-businesses/child-safe-organisations**.
[18] Child Safety Commission of Inquiry, *From Pressure to Purpose: Reforming Child Protection in Queensland* (Brisbane: Queensland Government, 2026), 158, **https://www.childsafetyinquiry.qld.gov.au/__data/assets/pdf_file/0019/907102/child-safety-commission-of-inquiry-report-from-pressure-to-purpose-reforming-child-protection-in-queensland.pdf**
[19] Queensland Child Death Review Board (2025). *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 40.
[20] Ibid 304, 305.

Aboriginal and Torres Strait Islander children are overrepresented in out-of-home care and may experience additional cultural, institutional and geographic barriers to disclosure and support. The Second Action Plan should ensure that actions affecting children in care are designed and implemented in partnership with Aboriginal and Torres Strait Islander children, families, communities and community-controlled organisations.

The National Strategy's priority groups framework recognises children and young people, people with disability, and Aboriginal and Torres Strait Islander people. Measures under the Second Action Plan should be designed and implemented in ways that respond to the distinct needs and experiences of these groups.[21] However, the First Action Plan does not include targeted measures addressing the residential care information-sharing failures, or the NDIS/WWCC integration, identified above. The national information-sharing mechanism proposed earlier in this submission should specifically address these gaps.

Harmful sexual behaviours

Early, therapeutic responses to harmful sexual behaviours

Theme 3 of the First Action Plan focuses on strengthening national responses to children with harmful sexual behaviours. The National Strategy notes that many children and young people who display harmful sexual behaviours have themselves experienced child maltreatment and most children and young people do not continue these behaviours into adulthood when they receive early, targeted therapeutic support.[22]

In Plain Sight, together with the narrative review of Australian public inquiries into residential care, reinforces this evidence in the residential care context. It identifies sexual abuse perpetrated by other children in care as a documented pattern and finds that such incidents are sometimes broadly classified as "sexual behaviour" or "disruptive behaviour".[23] This can limit effective safeguarding responses and appropriate referrals.

Deloitte's independent evaluation of the First Action Plan confirms that 80 per cent of Theme 3 activities remain "in progress", the highest proportion of any theme under the National Strategy.[24] Theme 3's foundational measures (12–16) including a National Clinical Reference Group, national standards, a clinical framework, workforce capability initiatives and community awareness activities were designed on a staged basis, with several measures intended to commence only once national standards are developed.

The Second Action Plan should prioritise completion of the national standards, clinical framework and workforce capability measures required to support consistent responses to harmful sexual behaviours. Responses must distinguish harmful sexual behaviours from developmentally expected behaviour, recognise the trauma and maltreatment experienced by many affected children, and provide timely, therapeutic support rather than defaulting to punitive responses.

[21] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 23.
[22] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 27.
[23] Kenny Kor, "Contextual Safeguarding against Harmful Sexual Behaviour and Child Sexual Exploitation: A Narrative Review of Australian Public Inquiries into Residential Care," *Children and Youth Services Review* 186 (2026): 109030, 8. https://doi.org/10.1016/j.childyouth.2026.109030
[24] Deloitte Access Economics, *Evaluation of the First Action Plans for the National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030: Final Evaluation Report* (Canberra: National Office for Child Safety, Attorney-General's Department, 2026), 37, https://apo.org.au/sites/default/files/resource-files/2026-07/apo-nid335148_1.pdf.

National information and referral service

Continuity with existing evidence

On 14 July 2026, Attorney-General Michelle Rowland announced the establishment of a National Information and Referral Service, comprising a website, helpline and specialist service navigators, to be delivered by the Australian Childhood Foundation by the end of 2026 in response to a recommendation of the Royal Commission into Institutional Responses to Child Sexual Abuse. This initiative aligns with Theme 2, Measure 7 of the First Action Plan, which commits to delivering a website and helpline to support victims and survivors to access information and services through trauma-informed, culturally safe and accessible assistance tailored to diverse needs.[25] The Commission supports the establishment of the National Information and Referral Service. Its design should include child-accessible entry points, specialist capability to support children in care and children with disability, culturally safe pathways for Aboriginal and Torres Strait Islander people, and clear arrangements for responding when a child discloses current or imminent harm.

Conclusion

The Second Action Plan should strengthen the connections between Australia's safeguarding systems so that risks are identified earlier, relevant information is shared and organisations act when concerns arise.

Children are placed at greater risk when information remains within individual organisations, sectors or jurisdictions, when they cannot safely raise concerns, and when accountability is unclear. These risks are especially significant for children in residential care, children with disability and Aboriginal and Torres Strait Islander children.

Drawing on the evidence outlined in this submission, the Commission identifies the following matters as priorities for consideration in developing the Second Action Plan:

- nationally integrated arrangements for sharing worker-screening, misconduct and safeguarding information
- clear cross-portfolio governance, ministerial accountability and public reporting
- minimum national expectations for safeguarding education, induction and refresher training
- complaints and disclosure mechanisms designed and evaluated with children and young people
- targeted safeguards for identified priority cohorts
- completion of the national standards, clinical framework and workforce capability for therapeutic responses to harmful sexual behaviours
- an accessible and responsive National Information and Referral Service
- stronger national capacity to detect and remove child sexual abuse material
- employment-law reform addressing protective action and "quiet exits"
- enforceable organisational governance and accountability obligations.

I encourage Australian governments to establish clear responsibilities, implementation timeframes and measurable outcomes under the Second Action Plan, and to clearly respond to the 10 recommendations of *In Plain Sight*.

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[25] Australian Government, National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, 41.

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