

# Review of System Responses to Child Sexual Abuse

**PeakCare's Submission to the Queensland  
Child and Family Commission**

28 July 2025

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# Introduction

PeakCare welcomes the opportunity to contribute to the Queensland Child and Family Commission's (QFCC) Review of System Responses to Child Sexual Abuse (the Review). PeakCare acknowledges the work undertaken by the Review in the development of the June 2025 Progress Report and is pleased to contribute our submission in response to this report.

## About PeakCare

PeakCare is a not-for-profit peak body for child and family services in Queensland, providing an independent voice representing and promoting matters of interest to the non-government sector. Across Queensland, PeakCare represents small, medium, and large local, state-wide and national non-government organisations which provide prevention and early intervention, generic, targeted, and intensive family support to children, young people, families, and communities. Member organisations also provide child protection services, foster care, kinship care and residential care for children and young people who are at risk of entry to, or who are in the statutory child protection system and youth justice systems.

A large network of associate members and supporters also subscribe to PeakCare. This includes individuals with an interest in child protection, youth justice and related services, and who are supportive of PeakCare's policy platform around the rights and entitlements of children, young people and their families to safety, wellbeing, and equitable access to life opportunities.

## PeakCare's Submission

### Blue card system reform

PeakCare maintains that safeguarding children and young people cannot be achieved through a single intervention. Instead, it requires embedding child-safe cultures and practices at every level of society. The Blue Card (Working with Children Check) system plays a critical role in Queensland's child safeguarding framework. However, as accurately highlighted in the QFCC's June 2025 progress report, it is reactive and limited in its capacity by design.

This limitation has been highlighted by PeakCare member organisations, who have shared that there needs to be investment in systems that can detect patterns of concerning behaviour over time, particularly where behaviour may raise red flags but does not yet meet the threshold for substantiated misconduct. A more comprehensive approach is required, which focuses on early indicators and cumulative risks.

The 2025 report, *More than a check: Enhancing the Working with Children Check Scheme to Strengthen the Safety Net around Children* by the Australian Childhood Foundation found a consistent theme that many adults in children's lives missed warning signs because they lacked the knowledge or confidence to act.<sup>1</sup> The report was informed by the voices of over 350 survivors of child sexual abuse, with survivors consistently reporting that adults around them missed warning signs. The *Hear Us Now, Act Now* report

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<sup>1</sup> Hakansson, E., Mitchell, J. and Webb, K. (n.d.). Available at: <https://www.childhood.org.au/app/uploads/2025/02/Our-Collective-Experience-Report-II-V3.pdf> [Accessed 23 Jul. 2025].

2024, also by the Australian Childhood Foundation, recommended the introduction of nationally consistent mandatory online training on child sexual abuse.<sup>2</sup> The training would be embedded into the application process for all adults seeking a working with children check. PeakCare supports this recommendation and urges the QFCC to consider its inclusion in the Review's finding.

PeakCare also endorses the Royal Commission into Institutional Responses to Child Sexual Abuse's 2015 recommendation to implement a national model for working with children checks.<sup>3</sup> Currently, variations between states and territories on who requires a check, vetting processes and follow-up monitoring still persists. PeakCare welcomes the Federal Government's commitment to a nationally consistent working with children check system, which aims to support near real-time reporting.<sup>4</sup>

However, we stress that any reforms must be accompanied by community education surrounding the scope of working with children checks, so that the check does not foster a false sense of security, but rather serves as one component within a broader, multi-layered safeguarding strategy.

## Child safe organisations and reportable conduct

The implementation of the *Child Safe Organisations Act 2024* provides an opportunity to improve safeguarding measures. However, this framework must be more than a compliance mechanism, and must support cultural change, leadership accountability, and sustained workforce capability across the child and family service systems.

Organisational cultures that prioritise child safety must be intentionally fostered and resourced. This includes embedding safeguarding in governance, recruitment, training, incident response, and continuous improvement. PeakCare emphasises that small and community-based organisations may require tailored guidance, capability development and financial support to meet the standards effectively. Implementation support must be equitable, scalable, and respectful of the diverse contexts organisations operate within.

PeakCare also recognises that the establishment of a nationally consistent Reportable Conduct Scheme, to be administered by the QFCC in Queensland will support in improving identification and action on reported incidents. Such a scheme would ensure that all allegations of child abuse involving adults in organisational settings, regardless of whether they meet criminal thresholds, are responded to with appropriate scrutiny, transparency, and accountability.

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<sup>2</sup> Hakansson, E., Tucci, J. and Mitchell, J. (n.d.). *Hear us now, First insights on prevention and early intervention from those with lived and living experience of child sexual abuse*. [online] Available at: <https://www.childhood.org.au/app/uploads/2024/02/Our-Collective-Experience-Project-%E2%80%93-First-Report.pdf> [Accessed 23 Jul. 2025].

<sup>3</sup> Royal Commission into Institutional Responses to Child Sexual Abuse WORKING WITH CHILDREN CHECKS REPORT. (2015). Available at: [https://www.childabuseroyalcommission.gov.au/sites/default/files/final\\_report\\_-\\_working\\_with\\_children\\_checks\\_report.pdf](https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_working_with_children_checks_report.pdf).

<sup>4</sup> Bermingham, K. (2025). *Federal Education Minister Jason Clare says Working with Children Check reforms 'can't happen soon enough'*. [online] Abc.net.au. Available at: <https://www.abc.net.au/news/2025-07-03/minister-criticises-working-with-children-reforms/105485620> [Accessed 23 Jul. 2025].

## Introduction of mandatory training for frontline workers

Queensland's early childhood education and care sector includes more than 52,000 workers<sup>5</sup> who play a vital role in safeguarding children during their early development years. Providing supervisors and staff with access to high-quality, practical training is essential to support workers in understanding their responsibilities and to feel confident to act on concerns.

PeakCare welcomes the Queensland Government's commitment to developing a mandatory Child Safety Training Package for all early childhood education and care staff, scheduled to be available in 2026.<sup>6</sup> We support efforts to ensure training is evidence-based, trauma-informed and accessible.

Insights from PeakCare's development of a Hope and Healing masterclass on Child Sexual Exploitation for residential care workers reinforces the importance of embedding cultural relevance, accessibility, and the practical application of training. In particular, the training must consider the needs of workers, children and families from culturally and linguistically diverse backgrounds.

Effective training should reflect the shared responsibility of safeguarding by incorporating strategies that are complemented by education for parents and carers. Strengthening protective environments in both home and care settings requires equipping all adults in a child's life with the knowledge and confidence to respond to concerns. This includes supporting kinship carers, foster carers and residential care workers, to understand their role in safeguarding and recognising signs of abuse.

PeakCare encourages the QFCC to consider how the rollout of mandatory training can contribute to a broader culture of safety, and to recommend implementation supports that ensure it is accessible to all parts of the workforce.

## National register for early childhood educators

PeakCare supports the exploration of a national workforce register for early childhood education and care educators as a mechanism to enhance child safeguarding and workforce integrity. A national register would assist services in verifying employment history, qualifications, and any substantiated concerns regarding a worker's conduct, strengthening oversight and helping to identify patterns of behaviour across jurisdictions and providers.

The Australian Childcare Alliance has advocated for a national register, as a practical and preventive step to improve transparency and accountability within a large and highly mobile workforce, as noted in the QFCC's Progress Report. The early childhood education and care sector is characterised by high levels of casualisation and staff turnover, which impacts the robustness of recruitment, supervision and compliance processes. A register would provide an additional layer of assurance, particularly where services are managing frequent staffing changes.

While not directly connected to the case reviewed by the board, PeakCare draws attention to the recommendations in our Insights and Opportunities – Queensland Residential Care Workforce report

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<sup>5</sup> Queensland Department of Education (2024) *Staff by position, 2020–24: By service type*. Brisbane: Department of Education.

<sup>6</sup> Update on the child safety review. (2025). *Early Childhood Education and Care*. [online] doi:<https://earlychildhood.qld.gov.au/sector-news-and-resources/news-for-educators-and-service-providers/update-on-the-child-safety-review>.

2024, which proposed that the QFCC also investigate the viability of a workforce register for residential care workers.<sup>7</sup> This proposal reflects a shared concern that workforce systems must do more to detect early indicators of risk and prevent individuals with concerning patterns from moving between providers undetected.

## Primary prevention approach

Primary prevention is fundamental to any sustainable effort to reduce the risk of child sexual abuse. PeakCare emphasises that the prevention of harm must begin long before risks emerge or disclosure occurs. A whole of community prevention strategy must equip adults, especially those in child-facing roles, with the knowledge, confidence and responsibility to recognise early warning signs, challenge harmful attitudes and take action to keep children safe.

PeakCare encourages the QFCC to prioritise recommendations that build a proactive safeguarding culture across all institutions, with prevention at its core. This includes funding of long-term prevention initiatives, embedding child protection messaging in everyday community settings, and resourcing sectors and communities to take leadership in keeping children safe.

## Conclusion

PeakCare thanks the QFCC for the opportunity to contribute to this review. Protecting children from abuse requires a whole-of-system response that embeds child safety into culture, leadership and everyday practices. PeakCare remains committed to supporting the QFCC in this important work and to support the implementation of evidence-informed reforms that uphold the safety of children. We look forward to the release of the final report and to working collaboratively to ensure its recommendations are translated into meaningful action.

Yours sincerely,



**Mr Tom Allsop**  
Chief Executive Officer

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<sup>7</sup> Insights and Opportunities – Queensland Residential Care Workforce DETAILED REPORT. (2024). Available at: <https://peakcare.org.au/wp-content/uploads/2025/03/PeakCare-Insights-and-Opportunities-Detailed-Report-Final.pdf>.