Queensland Sexual Assault Network
Level 13, 200 Mary Street
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Strengthening sector • Supporting survivor voices • Driving change

14th September 2026

The Secretariat
Education, Arts and Communities
Committee
Parliament House
George Street
Brisbane Qld 4001

Email: eacc@parliament.qld.gov.au

Dear Sir/ Madam,

RE: Queensland Protection Commission Bill 2026

Thank you for providing opportunity to provide a response to this Bill.

About QSAN

The Queensland Sexual Assault Network (QSAN) is the sexual violence peak body for specialist sexual violence prevention and support organisations in Queensland. We have 21 member services, including specialist services for Aboriginal and Torres Strait Islander victim-survivors, culturally and linguistically diverse women, people with intellectual disability, young women, trans and gender diverse people, men and children and our membership are located throughout Queensland, including in rural and regional locations.

Most of our services respond to children 12 years and over and some have specialist counselling responses for child victim-survivors under 12 years as well as those children involved in harmful sexualised behaviour programs.

Our network of non-Government services is funded to provide specialist sexual assault counselling, support, and prevention programs in Queensland. QSAN is committed to working towards ensuring all Queenslander's who experience sexual violence recently or historically, regardless of age, gender, sexual orientation, cultural background receive a high-quality response in line with best practice, client-centred principles. Our work and analysis of sexual violence is from a feminist perspective and addressed within a specialist trauma framework.

We are committed to engaging with government and other bodies to raise systemic issues of concern, and to ensure the voices and experiences of victims-survivors of sexual violence are considered in the formulation of policy and legislation that impacts on sexual violence victims in Queensland.

The Bill:

Independence of the Commissioner

The establishment of the Queensland Child Protection Commission and the appointment of a commissioner with responsibility for coordinated child safeguarding and child protection oversight are of vital importance.

To fulfil these responsibilities effectively, the commissioner must be, and be seen to be, independent of government. Independence is essential to building community trust, maintaining integrity and ensuring that the commissioner can provide frank and impartial advice without fear of reprisal or other consequences.

We are therefore concerned about the potential impact of section 17(2) and (3) of the legislation, which provide that:

"The Governor in Council may, at any time, remove the commissioner or a deputy commissioner from office on the recommendation of the Minister."
"The Minister may recommend the removal of the commissioner or deputy commissioner for any reason or none."

The absence of defined grounds for removal creates a risk that the Commissioner's independence may be undermined or perceived to be undermined. We recommend that removal be permitted only on clearly specified and reviewable grounds, such as serious misconduct, incapacity or substantial failure to perform the functions of office, and that appropriate procedural safeguards apply.

Expansion of reportable conduct to include boundary transgressions

We also recommend that the legislation underpinning Queensland's reportable conduct scheme be expanded. It should capture a broader range of grooming behaviours that includes "boundary transgressions", consistent with approaches adopted in some overseas jurisdictions.

Failure to implement Recommendation 12

We are disappointed by the Government's response to Recommendation 12 of the *In Plain Sight Review*, which called for further investment in support services for survivors and their families. This recommendation should be a priority for any government committed to upholding victims' rights. Child survivors and their families experienced profound distress and trauma because of the offending associated with the Griffith case, and their experiences informed the consultations undertaken for the Review.

There is chronic underinvestment in specialist child sexual abuse support services across Queensland, particularly for children under 12 years of age. The failure to implement Recommendation 12 follows the incomplete implementation of Recommendation 9.6 of the 2017 Royal Commission into Institutional Responses to Child Sexual Abuse, which similarly called for increased funding for specialist sexual assault services to address identified gaps.

Children have a right to recover from child sexual abuse, and Queensland children deserve timely, accessible and effective support. In some parts of the state, appropriate services are simply unavailable.

Specialist sexual violence services require sustained and increased investment to:

- develop specialist counselling and therapeutic responses for children who have experienced sexual abuse;
- provide support for survivors and their families;
- deliver early-intervention and prevention programs; and
- address regional and age-related service gaps, particularly for children under 12.

These investments are essential to achieving the National Plan to End Violence against Women and Children's objective of ending violence against women and children in one generation.

Unfortunately, we must ask: if a case like the Griffith case occurred again, would Queensland's current service system be able to respond adequately? At present, there is serious concern that it could not.

Guaranteed First Nations and Lived Experience involvement

Further we support calls and believe the commission would be strengthened by guaranteed roles for a first nations commissioner or executive leadership and lived experience advice and involvement.

Evaluation

We are also supportive of the commission being independently evaluated in three (3) years to ensure it is best practice and meeting its obligations to victim-survivors and the broader community.

We urge the Committee, in summary, to strengthen the statutory independence of the commissioner, broaden the reportable conduct scheme and recommend sustained investment in specialist sexual violence support services for child sexual abuse survivors and their families, include guaranteed positions for first nations people and lived experience and a commit to an independent evaluation.

If you require any further information, please do not hesitate to contact QSAN Inc.

Kind Regards,



Angela Lynch
QSAN
CEO