



Childlight East Asia and Pacific Hub

Submission to the Education and Employment References Committee

Inquiry into the quality and safety of Australia's early childhood education and care system

We welcome the opportunity to contribute to this important inquiry.

The Childlight East Asia & Pacific Hub, based at the University of New South Wales, is part of Childlight, the Global Child Safety Institute, headquartered at the University of Edinburgh. The Hub was launched in 2024 to address the urgent need for robust, region-specific data and insights on child sexual abuse. Working in partnership with governments, civil society organisations and survivor advocates, the Hub undertakes large-scale research projects and produces actionable knowledge to inform prevention, law enforcement, victim support, and child protection systems. By aligning local knowledge with international expertise, the Childlight East Asia & Pacific Hub plays a critical role in advancing evidence-informed strategies to keep children safe.

Drawing on this expertise, our submission focuses on child sexual abuse and reforms to strengthen overall safety and trust in the childcare system, with reference to:

- *the health and safety of children in childcare services across the country,*
- *the effectiveness of Australia's childcare regulatory system, and*
- *transparency within the early childhood education and care system, including access to information and data.*

Australia's early childcare sector provides services to 1.5 million young children but has not been adequately positioned within safeguarding frameworks as a high-risk environment for sexual abuse. This gap has left babies and toddlers exposed to egregious harm, while undermining parental confidence in the sector and jeopardising broader national goals including early childhood learning, workforce participation, and gender equality. Our submission calls for comprehensive reforms to safeguards, regulation, and workforce practices to protect children from sexual abuse and exploitation. Urgent action is needed not only to prevent further harm, but also to restore parental trust, support the childcare workforce, and advance Australia's ambitions for a world-class early childhood education system.

Background

Child sexual abuse in the early childcare sector occurs at the intersection of two unresolved policy challenges: (1) the acute vulnerability of babies and toddlers to sexual abuse, and (2) the rapid expansion of the Australian childcare sector without adequate safety measures.

1. The vulnerability of babies and toddlers to sexual abuse

Self-report victimisation studies consistently show that very young children are targeted for sexual abuse. In Australia, 12% of individuals who experienced sexual abuse before the age of 15 reported that their first incident occurred between the ages of 0 and 4 (ABS, 2023). This figure is almost certainly an underestimate, since the abuse of very young children can occur prior to the development of explicit memory functions, and hence such victims cannot self-report sexual abuse. Other data sources highlight the risk of sexual abuse and exploitation of babies and infants. Prepubescent children are consistently over-represented as victims in highly traded child sexual abuse material (C3P, 2016) with abuse images and videos trending towards increasingly young victims over time (Salter & Whitten, 2022). Content analysis of child sexual abuse material shows that, the younger the victim depicted in the image, the greater the risk that the image depicts severe and sadistic abuse (C3P, 2016; Salter & Whitten, 2022; Seto et al., 2018).

2. The expansion of the early childcare sector in the absence of adequate safety measures.

Between 2004 and 2024, the number of Australian children in government-subsided childcare places doubled to 1.5 million, and the size of the childcare workforce tripled. However, regulators are under-resourced while quality and safety standards vary considerably across the sector (Productivity Commission, 2024). The growing dominance of for-profit providers, high staff turnover and casualisation has created blind spots that can be exploited by premeditated offenders seeking to abuse pre-verbal and young children. Since the 1980s, a disproportionate number of childcare sexual abuse cases have involved organised offenders and the production of child sexual abuse material (Cheit, 2014; Finkelhor & Williams, 1988; Waterman et al., 1993). Unfortunately, the lessons of such cases have not been implemented. The early childcare sector needs a cascading approach to child safeguarding to prevent sex offenders from entering the workforce, to protect children in institutional settings, and to identify and expel offenders as quickly as possible.



Australian case studies

Below are three recent case studies from Australia illustrating a pattern of abuse in which members of online child sex offender communities find employment in the Australian childcare sector for the purpose of abusing and exploiting children.

- **Ashley Griffith (Queensland, 2024):** Griffith worked in multiple childcare centres for nearly 20 years. He was sentenced to life imprisonment after pleading guilty to 307 offences against 73 girls aged two to five, including rape and the production of child sexual abuse material. He filmed more than 4,500 images and videos of abuse, often during nappy changes and sleep times, and shared material in offender networks. Concerns raised by parents and staff were ignored, and whistleblowers faced retaliation. His crimes were uncovered only after police traced items in sexual abuse footage to a specific centre.
- **Timothy Doyle (New South Wales, 2020):** Doyle worked as an educator between 2017 and 2019. In 2018, a mother reported her child's disclosure of abuse, leading to an internal prohibition notice but no referral to police. More than a year later, police uncovered child sexual abuse material linking Doyle to an international network. He was convicted of over 300 offences, with 16 of his 30 identified victims in his care. Doyle used routine caregiving tasks to access children and shared material via encrypted platforms. The service's failure to escalate the mother's complaint allowed the abuse to continue.
- **Shannon McCoolle (South Australia, 2014):** McCoolle worked in multiple ECEC services before joining residential care. Arrested in 2014, he was convicted of producing and distributing child sexual abuse material and abusing at least seven children aged 18 months to 7 years. Despite being assessed as "very unsuitable" for child-related work, he was repeatedly employed. Staff raised concerns as early as 2010, but these were dismissed. A colleague who reported him faced workplace retaliation. His arrest led to the establishment of the *Royal Commission into Child Protection Systems*, which recommended major reforms.

The scale of offending evident in these cases, spanning hundreds of victims and thousands of images, underscores the systemic failures in safeguarding, regulatory oversight, and workforce protections. Together, these cases demonstrate the urgent need for robust, preventative reforms to stop offenders from entering the sector, ensure timely escalation of concerns, and protect those who raise alarms.



Key considerations

1. Sexual abuse and exploitation of pre-verbal and very young children.

Children under five face heightened risk of sexual abuse due to their developmental vulnerability, reliance on adults, and limited capacity to recognise or disclose harm (Romano & Hayez, 2024). Offenders deliberately target pre-verbal or very young children, knowing that their abuse is difficult to detect and prove. Research confirms that infants and toddlers may display distress, dissociation, or emotional dysregulation as a result of abuse (Tejada & Linder, 2020; Yüksel & Koçtürk, 2020). However, even where very young children can disclose abuse, their testimony rarely meets evidentiary threshold required by criminal proceedings. As a result of these intersecting factors, sexual abuse in early childcare settings may only come to light via police investigations into online child sexual abuse material. This gap underscores the need for proactive safeguards that do not rely solely on a child's ability to report.

2. Premeditated offenders seeking child-focused employment

Evidence indicates that a significant cohort of offenders actively seek employment in child-focused roles to facilitate abuse. A national survey of almost 2,000 Australian men found that 9.4% reported some form of sexual offence against a child, including 3.2% who reported sexual contact with a minor while they were over 18 (Salter et al., 2023). Men with a sexual interest in children who engaged in offending were more likely than their peers to be married or partnered, have strong social supports, and – critically – employed in child-related work. They were also more likely to minimise or justify sexual abuse, while concealing their online activities through encrypted platforms and the dark web. Offenders who present a superficially prosocial façade are unlikely to be detected abusing children for many years if they are detected at all (Nicol et al., 2024).

3. Systemic gaps in oversight, prevention and deterrence

The regulatory framework for early childcare is ill-equipped to address the specific risks of child sexual abuse. Regulators remain under-resourced with limited expertise to recognise CSA-related offending patterns. Services have repeatedly failed to escalate credible concerns to police or child protection authorities, leaving children exposed. Organisational cultures that discourage or retaliate against whistleblowers compound the problem, while weak information-sharing within and across jurisdictions allows individuals who pose a risk to continue working undetected. These systemic gaps reveal that oversight mechanisms designed around educational quality or general safety standards cannot protect against the deliberate and premeditated strategies of child sex offenders. What is required is a child sexual abuse-specific safeguarding framework that integrates deterrence, robust monitoring, and independent accountability, alongside strong protections for those who report concerns.



Recommendations

Our recommendations directly address the systemic weaknesses identified in offender case studies, survey data, and law enforcement investigations.

Strengthen safeguards and oversight

Babies and toddlers are a particularly vulnerable cohort of children and they require enhanced safeguarding measures in institutional settings. These measures should include:

- **National minimum safety standards:** All states and territories should adopt a nationally consistent safeguarding framework for childcare with specific provisions addressing the risk posed by premeditated child sex offenders.
- **Audit and enforcement capacity:** Increased funding to regulators to improve unannounced inspections, longitudinal tracking of services, and compliance audits.
- **Enhanced screening and assessment:** The development and rollout of validated tools to detect risk indicators among staff (e.g. structured attitudinal assessments, scenario testing in hiring).
- **The “four eyes” principle:** Mandated requirement that at least two adults have line of sight of a child at any one time in a childcare setting.
- **Safeguarding by design:** The design of the physical childcare environment to ensure visibility and reduce opportunities for abuse. Such practices include the use of CCTV in high-risk areas, with privacy protections in place.
- **Technology and offender networks:** Closer cooperation between regulators and police to identify childcare staff engaged in online abuse networks.

Build workforce capability

Recognising that the early childcare sector is being targeted by premeditated child sex offenders, the capacity of the workforce to detect and intervene in sexual offending should be enhanced via:

- **Pre-service training:** Child sexual abuse and grooming prevention should be embedded in all certificate, diploma and tertiary early childcare programs.
- **In-service training:** Staff training should include mandatory units on grooming, boundary violations, indicators of abuse in pre-verbal children, and the prevention of sexual abuse in childcare settings.
- **Reporting pathways:** Training on reporting protocols for allegations of sexual misconduct, ensuring integration and coordination between reporting pathways (ie reportable conduct schemes, notifications to child protection or the education department, escalation to law enforcement).
- **Mandatory refreshers:** Annual or biennial refresher training on grooming, boundaries, and reporting.
- **Cultures of institutional courage:** Sector and institutional policies should actively promote cultures of “institutional courage” (Freyd & Becker-Blease, 2024) that value transparency, accountability and supportive responses to children, staff and parents who raise allegations of abuse and misconduct. These policies should include provisions for staff who report concerns, including mandatory protections against retaliation, whistleblower frameworks, and trauma-informed supports.



Increase transparency and accountability

There is currently a lack of data on child sexual abuse cases in the early childcare sector, which impedes evaluation of the efficacy of prevention efforts and limits public awareness of the problem. Data systems should be built including:

- **Public regulatory data:** Regulators should publish annual statistics on complaints, referrals to police, and service-level outcomes, disaggregated by state/territory and service type.
- **Service-level public reporting requirements:** Services should publish an annual safeguarding statement, including key information such as training completion rates.
- **Parent engagement:** The sector should develop guidelines for communication to parents about safeguarding measures, policies and processes (e.g. routine updates on safeguarding policies, parental access to CCTV policies, and clear complaint escalation pathways).
- **Research and evaluation:** A program of funded research into sexual abuse in early childcare, including surveys of child and parent satisfaction with childcare safety, outcomes and needs assessment of children sexually abused in childcare and their families, effective models of support for abused children and their families, and rigorous evaluation of prevention initiatives.

Aftercare for victimised children and their parents

Support and care options in the aftermath of a childcare sexual abuse incident are currently limited. Australia needs a support response framework for childcare sexual abuse including:

- **Developing and resourcing response frameworks for childcare sexual abuse events:** Childcare sexual abuse can involve dozens or even hundreds of potential victims. Australia needs a response framework for such mass victim events that includes resourcing for specialist sexual assault sectors to rapidly scale support for children and their families.
- **Creating resources for parents and families of children sexually abused in childcare:** Research with parents and caregivers whose children have been sexually abused in childcare should inform the development of resources to be provided in the aftermath of an abuse incident.
- **Tracking and disruption of abuse material:** The Australian government should invest in systems such as Project Arachnid (<https://projectarachnid.ca/en/>) to ensure that the distribution of abuse material produced by childcare offenders and shared through online networks is being actively disrupted. Such systems can be used to provide the parents of children abused in childcare with accurate information about the extent of distribution of abuse material of their children, as well as efforts to remove this material from circulation.



References

- ABS. (2023). *Childhood abuse, 2021-2022 (Table 4.1, Experiences of sexual abuse before the age of 15, by age at first incident)*. Australian Bureau of Statistics, Canberra.
<https://www.abs.gov.au/statistics/people/crime-and-justice/childhood-abuse/latest-release>
- C3P. (2016). *Child sexual abuse images on the Internet*. Canadian Centre for Child Protection.
<https://protectchildren.ca/en/resources-research/child-sexual-abuse-images-report/>
- Cheit, R. (2014). *The Witch-Hunt Narrative: Politics, Psychology and the Sexual Abuse of Children*. Oxford University Press.
- Finkelhor, D., & Williams, L. M. (1988). *Nursery Crimes: Sexual Abuse in Day Care*. Sage.
- Freyd, J. J., & Becker-Blease, K. (2024). Institutionalizing Courage to Create a Safe Community. In Ray, E. (Ed). *A Handbook of Higher Education Leadership*. Oregon State University.
<https://open.oregonstate.edu/handbookhighereducationleadership/chapter/institutionalizing-courage-to-create-a-safer-community/>
- Nicol, S. J., Ogilvie, J., Harris, D. A., Kebbell, M. R., & Christie, T. B. (2024). Evading detection: Characteristics of individuals with extrafamilial child sexual offences and long detection lags. *International journal of offender therapy and comparative criminology*, 68(8), 767-784.
- Productivity Commission. (2024). *A Path to Universal Early Childhood Education and Care*. Report No. 106. Australian Government.
<https://www.pc.gov.au/inquiries/completed/childhood/report/childhood-volume1-report.pdf>
- Romano, H., & Hayez, J.-Y. (2024). Le viol des bébés, repérage et prise en charge. *Annales Médico-psychologiques, revue psychiatrique*. 182(2), 142-149.
- Salter, M., & Whitten, T. (2022). A comparative content analysis of pre-internet and contemporary Child sexual abuse material. *Deviant Behavior*, 43(9), 1120-1134.
- Seto, M., Buckman, C., Dwyer, R., & Quayle, E. (2018). *Production and Active Trading of Child Sexual Exploitation Images Depicting Identified Victims: NCMEC/Thorn Research Report*.
https://www.thorn.org/wp-content/uploads/2024/01/Production-and-Active-Trading-of-CSAM_FullReport_FINAL.pdf
- Tejada, A. J., & Linder, S. M. (2020). The influence of child sexual abuse on preschool-aged children. *Early Child Development and Care*. 190(12), 1833-1843.
- Waterman, J., Kelly, R. J., Oliveri, M. K., & McCord, J. (1993). *Behind the Playground Walls: Sexual abuse in Preschools*. Guilford Press.
- Yüksel, F., & Koçtürk, N. (2020). Child sexual abuse in preschool age: Victims, perpetrators and familial risk factors. *Children and Youth Services Review*, 117, 105297.

