



2 August 2026

Ella Haddad MP

Chair

Inquiry into the Community Protection (Offender Reporting) Amendment Bill 2025 (No. 61 of 2025)

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Response to Questions on Notice from Hearing on Monday, 3 August 2026

Thank you for your letter of 12 August 2026 inviting SASS to provide further information in relation to matters taken on notice following my appearance before the Committee on 3 August 2026.

Please find below SASS's responses to the questions raised by the Committee

1. In terms of the people that SASS has supported who might have been exposed to the current Tasmania proactive reporting regime of reportable offenders, do you have any reflections on where it is or isn't working, or gaps that need to be filled or fixed in the existing system?

SASS's work with victim-survivors, children who have displayed harmful sexual behaviour and their families provides insight into experiences relevant to disclosure. We do not, however, routinely receive information about whether, or in what circumstances, the proactive disclosure powers have been considered or exercised. While this limits the extent to which we can draw broader conclusions about how consistently the existing provisions operate in practice, our experience identifies safeguarding considerations that are important to the operation of proactive disclosure.

A well-functioning proactive disclosure scheme extends beyond the act of disclosure itself to the broader safeguarding processes that inform and follow it. In matters involving child sexual harm, relevant information may be held across different agencies and may relate to patterns of behaviour or concern, access to children, previous interventions, emerging concerns, and relevant risk and protective factors. In addition to appropriate information-sharing, risk assessment and management, and interagency consultation, clear interagency roles and responsibilities are also important to ensuring that appropriate safeguarding action is taken, including safety planning, support and referral, and any further protective action required. This helps to ensure that safeguarding needs are identified and acted upon, appropriate supports are coordinated, and responsibility is not diffused across agencies and services.

These considerations are also consistent with SASS's submission, which recommends consideration of the nature and volume of proactive disclosures, and the governance, risk assessment, information-sharing and decision-making processes that underpin them.

2. Does SASS wish to provide comment on the proposed amendment in the Bill that people who are under charge for sexual offences, but not yet convicted, may have their names disclosed in some instances under the proposed scheme? You may wish to refer to Clause 19 of the Bill.

SASS recognises the safeguarding rationale underpinning clause 19 and considers that its implementation should be supported by a clearly defined safeguarding and risk-management framework governing the exercise of the disclosure power.

Disclosure should be situated within a broader safeguarding response rather than treated as a discrete information-sharing action. The framework should guide the purpose, scope and manner of disclosure and ensure that decision-making considers both the protective action required and any foreseeable risks or unintended consequences for children, the alleged victim-survivor and others connected with the matter.

Particular consideration should be given to the safety, privacy and wellbeing of the alleged victim-survivor. Proposed section 15E permits disclosure that a person has been charged with a reportable offence and “the details of that offence”. In sexual offence matters, information about the alleged offending may directly or indirectly identify the alleged victim-survivor. Disclosure may also increase risks of retaliation, intimidation, family violence, unwanted contact, pressure or wider dissemination of information. The framework should therefore require consideration of the potential impacts of disclosure on the alleged victim-survivor and careful assessment of what information is necessary for the identified safeguarding purpose. Where practicable and safe, consultation with the alleged victim-survivor should inform assessment of the potential impacts of disclosure, including any risks to their safety, privacy or wellbeing and any additional safeguards that may be required.

Where disclosure is made to an employer or prospective employer, it should be accompanied by clear guidance and timely access to specialist safeguarding advice and consultation. Employers will vary considerably in their safeguarding experience, capability and confidence, and receipt of this information may require consequential decisions about contact with children, duties, supervision, workplace arrangements, confidentiality and other protective measures. The scheme should support employers to understand their responsibilities, assess the implications of the disclosure within their particular workplace context, and translate that information into a proportionate safeguarding response. Disclosure should enable an informed and coordinated protective response, rather than leave individual employers to navigate complex safeguarding and risk-management decisions without appropriate support.

3. The Bill proposes that children can make application for the disclosure of reportable offenders in some instances. Given the expertise of SASS, which group should be responsible for supporting a child after such a disclosure is made to them and should that support be mandatory? You may wish to refer to Clause 43 - 45 of the Bill.

SASS considers that the application process and any subsequent action, including disclosure, should occur within a properly resourced, child-centred, trauma-informed and multi-agency safeguarding framework. A child should not be expected to interpret potentially distressing or life-altering

information, assess its implications for their own safety, manage confidentiality obligations, or determine what protective action may be required without appropriate support.

An application made by a child should not be treated solely as an administrative request for information. The process should seek to understand what has prompted the application, the nature of the child's concerns, whether a safe and trusted adult is available to them, and whether the circumstances indicate a need for further assessment, support or protective action. Any safeguarding concerns identified through this process should be responded to irrespective of whether the application ultimately results in disclosure.

The Bill requires the Commissioner, before making a disclosure directly to a child, to be satisfied that disclosure is in the child's best interests and is necessary and appropriate for their safety and wellbeing. SASS considers that this should be supported by a mandatory safeguarding framework, with Tasmania Police/the Commissioner having overarching responsibility for ensuring that the required processes occur from the point at which an application by a child is received. This should include ensuring that relevant information is gathered and shared appropriately, the child's safety and support needs are assessed, necessary safety planning occurs, relevant agencies and services are engaged, and any disclosure is planned and delivered safely and with appropriate supports in place. This overarching responsibility should be exercised in coordination with other agencies and services according to their respective roles, responsibilities and expertise and should enable appropriate information-sharing, secondary consultation and coordinated referral between relevant agencies, while ensuring that identified safeguarding needs do not fall between services.

Different agencies and services will have distinct statutory responsibilities, functions and expertise, and the appropriate response should be determined by the circumstances and needs of the individual child. For some children, a safe and protective parent, caregiver, family or kin member may be best placed to provide ongoing support, with professional assistance where required. For others, the nature of the concerns, the child's circumstances or the absence of a safe adult may require involvement from Child Safety Services, a specialist sexual assault or family violence service, an Aboriginal Community Controlled Organisation, a disability or mental health service, or another professional or service known and trusted by the child. For some children, a safe and protective parent, caregiver, family or kin may be best placed to provide ongoing support, with professional assistance where required. Where there is no safe or appropriate adult available, the child should have access to an independent, appropriately trained support person or service.

At a minimum, SASS recommends that the statutory framework, regulations or mandatory operational guidelines require:

- a pre-disclosure safeguarding assessment that considers the child's circumstances, immediate safety, developmental and communication needs, existing supports, and relationship with the person who is the subject of the application;
- exploration of what has prompted the application and whether it raises safeguarding concerns requiring further assessment or action;
- appropriate information gathering, interagency consultation and support and safety planning, including consideration of any foreseeable risks arising from both non-disclosure or disclosure;
- meaningful engagement with the child throughout the process, including supporting them to express their views and concerns and giving those views appropriate weight in decisions about

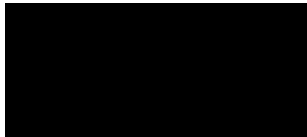
how disclosure occurs and who they trust and want involved, as well as information about relevant safeguarding responsibilities as appropriate;

- identification of a safe adult or, where no suitable adult is available, access to an independent, appropriately trained support person or service;
- culturally safe and accessible responses, including access to Aboriginal Community Controlled Organisations and other culturally appropriate supports;
- engagement and disclosure through an appropriately supported process using developmentally appropriate, trauma-informed and accessible communication, providing ongoing opportunities to clarify the child's understanding;
- warm referral or direct connection to appropriate support; and
- planned post-disclosure follow-up, including accessible opportunities for the child to raise new concerns, ask further questions and seek assistance, to assess their ongoing safety, wellbeing and support needs without inadvertently escalating risk.

The framework should reflect child-centred practice and recognise each child's individual circumstances, developmental needs and evolving capacities. Children's views should be actively sought and given appropriate weight, while adults, services and statutory authorities retain responsibility for exercising their respective duties of care, safeguarding responsibilities and statutory obligations.

Please contact Shirleyann Varney, CEO by email at [REDACTED] should you have any further questions or require additional information.

Kind regards,



Shirleyann Varney
Chief Executive Officer
Sexual Assault Support Service