

**Harm Prevention and Regulation**

# Queensland Worker Screening Services

**2024-25 Regulator Performance Report**

## Introduction

This report has been prepared under the Queensland Government's Regulator Performance Framework.

Since 1 September 2024, Queensland Worker Screening Services (QWSS) has included Blue Card Services (BCS) and Disability Worker Screening (DWS).

BCS administers Queensland's Working with Children Check ('the blue card system'). The system is regulated by the [\*Working with Children \(Risk Management and Screening\) Act 2000\*](#) (WWCA).

BCS contributes to the creation of safe and supportive environments for children and young people by screening and monitoring people who work with children and young people and ensuring organisations and individuals that provide child-related services and activities in Queensland comply with the WWCA.

DWS administers Queensland's Disability Worker Screening system for roles related to the National Disability Insurance Scheme (NDIS) as well as state-based service providers. This system is regulated under the *Disability Services Act 2006* (DSA).

DWS contributes to the safeguarding of the safety, rights, and wellbeing of people with disabilities by screening and monitoring individuals and ensuring compliance with the DSA by organisations and workers.

Together, BCS and DWS contribute to creating safer environments for vulnerable people by ensuring that only suitable individuals are cleared to work in regulated roles and by supporting organisations to meet their legal obligations.

# Model practice 1: Ensure regulatory activity is proportionate to risk and minimises unnecessary burden

## Supporting principles:

- a proportionate approach is applied to compliance activities, engagement and regulatory enforcement actions.
- regulations do not unnecessarily impose on regulated entities.
- regulatory approaches are updated and informed by intelligence gathering so that effort is focused on risk.

## Evidence to support alignment with regulator model practice

QWSS implement a risk-based proportionate approach in administering Queensland's Working with Children Check and Disability Worker Screening systems - through a wide range of activities that promote outcomes focussed practices to support the rights, interests, and wellbeing of vulnerable people in Queensland.

Key regulatory priorities for the 2024-25 financial year included:

- development of a risk and data-driven analytic tool for BCS to drive insights maximising the value of engagement and intervention activities with a plan to extend this tool to DWS in 2025-26.
- focused engagement with First Nations applicants, employers, and communities to support compliance with blue card and disability worker screening system requirements and reduce the impact of the misuse of worker screening.
- BCS proactively audited businesses and other organisations operating in regulated sectors in alignment with its published strategy, [Compliance and Enforcement Policy and Priorities](#), with a focus on child. accommodation services, sport and active recreation, outside school hour care services, youth hostels, and private teaching, coaching and tutoring.
- DWS proactively audited suspended card holders to ensure these cards were returned minimising the risk that they could be used to falsely indicate clearance to work.

Regulatory activities across 2024-25 included:

- undertaking extensive national criminal history checks and reviewing assessable information to determine whether an individual is eligible to hold a blue card and/or a Disability Worker Screening clearance.
- reassessing eligibility by undertaking the same rigorous processes, to ensure that individuals already holding a blue card and/or a DWS clearance continue to meet the necessary standards to work with children or people with disabilities.
- supporting voluntary compliance through extensive engagement and education, including providing regulated industries with worker screening system information, resources and support.
- working with service providers to correct administrative breaches to ensure worker screening systems are being applied correctly and to prevent higher risk breaches from occurring.
- escalating compliance activities where voluntary compliance is unable to be achieved or a high-risk issue is identified.
- where a high risk issue is identified, or an educative approach is not appropriate, DWS will undertake its own investigation and BCS refers potential breaches of legislation to the Queensland Police Service (QPS) for investigation and possible prosecution.

## Model practice 2: Consult and engage meaningfully with stakeholders

### Supporting principles

- Formal and informal consultation and engagement mechanisms are in place to allow for the full range of stakeholder input and Government decision making circumstances.
- Engagement is undertaken in ways that help regulators develop a genuine understanding of the operating environment of regulated entities.
- Cooperative and collaborative relationships are established with stakeholders, including other regulators, to promote trust and improve the efficiency and effectiveness of the regulatory framework.

### Evidence to support alignment with regulator model practice

QWSS maintained information sharing relationships with numerous Queensland and Commonwealth government agencies to actively share and receive critical information regarding individuals and organisations regulated by the blue card and disability worker screening systems. Information sharing provisions exist between QWSS and the following organisations:

- Queensland College of Teachers.
- Early Childhood Regulatory Authority.
- Australian Federal Police.
- Queensland Police Service.
- Department of Families, Seniors, Disability Services and Child Safety.
- Australian Criminal Intelligence Commission.
- NDIS Quality and Safeguards Commission (NDIS Commission).
- Office of the Health Ombudsman.
- Department of Primary Industries.
- Australian Health Practitioner Regulation Agency.
- interstate Disability Worker Screening and Working with Children Check agencies.

QWSS engaged with a wide range of stakeholder groups, including formal and informal engagement with:

- intrastate, interstate, and federal government departments and agencies.
- governance groups, including an Implementation Reference Group, Implementation Oversight Group and various steering committees related to blue card system reforms.
- peak bodies across a wide range of sectors.
- First Nations peak bodies including the Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP).
- Community Connector groups and grassroots organisations providing frontline services in metropolitan, regional, and remote First Nations communities.
- community organisations across a wide range of sectors including sporting, cultural, religious, education and disability services.

QWSS worked collaboratively with stakeholders across Queensland to promote understanding of our systems and regulatory obligations. Through tailored engagement and collaboration, organisations, service providers, and communities, particularly in regional and remote areas, were provided with advice to help ensure compliance with legislative requirements and support with navigating the application process.

These efforts highlight QWSS' commitment to fostering safer environments for children, young people, and people with disabilities through education, collaboration, and strong community partnerships.

QWSS travelled to remote and regional communities (including Mossman, Weipa Cooktown, Wujal Wujal and Hopevale, Mornington Island, Palm Island, Kowanyama, Yarrabah, Thursday Island, Aurukun, Lockhart River, Woorabinda, Cherbourg, Mossman, Hope Vale, Coen, Normanton and Doomadgee), and regional cities to provide practical support to applicants and organisations.

More specifically, in the 2024-25 financial year, BCS:

- engaged with 1,942 regulated organisations to provide information about, and ensure compliance with, legal requirements under the blue card system.
- carried out 1,051 checks with organisations about people prohibited from working with children.
- undertook appropriate enquiries and engagement to finalise 2,119 potential blue card compliance issues.
- launched a First Nations co-designed, place-based Blue Card Liaison Officer pilot program in the Palm Island community to improve community access to the blue card system by delivering culturally appropriate resources and processes. This Palm Island service complements the successful program introduced to Yarrabah in 2023-24.

In the 2024-25 financial year, DWS:

- finalised 191 compliance reviews and investigations and issued 104 caution/warning letters to organisations for breaches of the DSA.
- finalised 156 reviews related to potential compliance issues and issued 83 warning letters to cardholders who failed to provide a reasonable excuse for not returning their physical card as part of the suspended cardholder compliance process.
- conducted 2,533 engagements with community members, and organisations offering tailored and culturally appropriate support to individuals navigating the Disability Worker Screening system.
- ensured that the unique needs of First Nations peoples, culturally and linguistically diverse (CALD) communities, and other vulnerable groups were met. This included providing resources in plain language, offering translation and interpretation services where required, and fostering trust and understanding through respectful and inclusive communication addressing concerns about applications and clarifying legislative requirements.

## Model practice 3: Provide appropriate information and support to assist compliance

### Supporting principles:

- Clear and timely guidance and support is accessible to stakeholders and tailored to meet the needs of the target audience.
- Advice is consistent and, where appropriate, decisions are communicated in a manner that clearly articulates what is required to achieve compliance.
- Where appropriate, regulatory approaches are tailored to ensure compliance activities do not proportionately burden particular stakeholders e.g., small business, or require specialist advice.

### Evidence to support alignment with regulator model practice

QWSS provided extensive information and support to stakeholders, offering clear guidance on system requirements under legislation.

The BCS and DWS websites provided information to support applicants and regulated organisations including:

- individual and organisational obligations and requirements prescribed by the WWCA and DSA.
- procedural information to assist individuals apply for a blue card or disability worker screening clearance.
- technical support for online systems to streamline application and compliance processes.
- updates on upcoming events, planned community visits and other engagement opportunities.

QWSS proactively, and upon request, engaged with various stakeholder groups and sectors to provide tailored information and advice in relation to organisational blue card and disability worker screening requirements.

Tailored resources for First Nations applicants and organisations were developed in collaboration with First Nations service providers. The resources included informational videos, and written guidelines.

QWSS continued to engage with First Nations stakeholders, including community groups, local governments and grassroots organisations based in regional and remote areas of Queensland. This engagement focused on reducing the misuse of worker screening systems by educating organisations about their obligations under the WWCCA and DSA and providing clear guidance regarding worker screening requirements for employees and volunteers in the community.

In the 2024-25 financial year, BCS:

- offered tailored and consistent responses to enquiries within seven (7) business days and operated a dedicated referral team to manage public reports of information of concern relating to individuals and organisations.
- developed a strategic communications and engagement plan for 2024-25, which focused on building industry knowledge of and compliance with blue card system requirements in preparation for the implementation of the Working with Children (Risk Management and Screening) and Other Legislation Amendment Act 2024. This plan focused on proactive engagement with new as well as existing stakeholder and industry groups, with a particular focus on the school, education and care, and sporting sectors. These activities focused on topics such as 'who needs a blue card', 'linking and other employer obligations', and 'benefits of using the Blue Card Services Organisation Portal'.
- provided information about the blue card system in five languages other than English. Fourteen BCS staff are multi-lingual, and voluntarily assist individuals where English is not their first language including Mandarin and Spanish.
- attended the Indigenous Procurement Workshop for Government in October 2024 to provide guidance about blue card requirements for First Nations businesses seeking to engage in Queensland government procurement practices.
- partnered with a First Nations consultancy organisation to develop a First Nations Practice Guide designed to provide practical support for BCS staff when engaging with First Nations applicants and stakeholders in a culturally responsive and trauma informed way.

- the Blue Card Liaison Officers recorded 698 engagements in Yarrabah and 706 engagements on Palm Island with community members, providing culturally appropriate support to community members engaging with the blue card system.

In the 2024-25 financial year, DWS:

- analysed data obtained through the complaints management function to enhance the organisation's ability to address and resolve stakeholder concerns effectively, with a focus on understanding the unique circumstances of each case. This process has also played a critical role in identifying recurring themes and systemic issues raised through complaints, enabling DWS to refine its processes and improve service delivery.
- collaborated closely with NDIS service providers and workers to strengthen their understanding of worker screening requirements reducing administration errors and ensure that all employees performing risk-assessed roles held the appropriate clearances. This included delivering tailored engagement and education sessions to address specific organisational and worker needs, improve onboarding and induction processes, and ensure compliance with legislative requirements.
- provided ongoing guidance and support to organisations and workers to ensure that the worker screening process was applied correctly, reducing the likelihood of repeated errors and mitigating the risk of higher-level breaches. This proactive approach helped organisations identify gaps in their processes and implement corrective actions to meet their obligations under the DSA.



## Model practice 4: Commit to continuous improvement

### Supporting principles:

- regular review of the approach to regulatory activities, including collaboration with stakeholders and other regulators to ensure it is appropriately risk-based, leverages technological innovation and remains the best approach to achieving policy outcomes.
- to the extent possible, reform of regulatory activities is prioritised on the basis of impact on stakeholders and the community.
- staff have the necessary training and support to effectively, efficiently and consistently perform their duties.

### Evidence to support alignment with regulator model practice

The Queensland Government continues to strengthen safeguards for vulnerable Queenslanders through ongoing reforms across QWSS systems. These reforms aim to ensure that only suitable individuals are cleared to work with vulnerable people, while also improving service delivery and accessibility for stakeholders.

In the 2024-25 financial year, BCS:

- reviewed and updated processes and procedures in response to stakeholder feedback, independent reviews, Parliamentary reports and standards to strengthen and streamline the system.
- developed, in consultation with other agencies and stakeholders, policies and processes in preparation for legislative change to commence in 2025-26, that aim to strengthen and streamline the operation of the blue card system.
- closed all 81 recommendations from the Queensland Family and Child Commission's 2017 Keeping Queensland's Children More than Safe: review of the blue card system (including those delivered in previous financial years).
- closed all strategies and actions from the Safe children and strong communities Strategy and Action Plan 2021-2025 and continued to embed these within operational practice including working with communities at a local level to:
  - ensure processes are culturally appropriate, culturally safe, simplified and connected with a trauma-informed lens through a First Nations Blue Card Liaison Officer program established within the Yarrabah and Palm Island communities to assist blue card applicants and organisations to navigate and engage more fulsomely with blue card system requirements.
  - engage with employers, including job agency networks that operate within First Nations communities, to provide clear guidance about blue card requirements prescribed by the WWCCA with the intent to reduce overcompliance with the blue card system.

In the 2024-25 financial year, DWS:

- reviewed and updated its processes and procedures in response to stakeholder feedback, operational insights, and evolving sector needs to enhance the efficiency and accessibility of the screening system while maintaining its integrity and compliance with the DSA.
- engaged with communities at a local level to identify opportunities for service design and delivery that are culturally safe, simplified, and connected.
- provided targeted support to First Nations communities, ensuring that processes are culturally appropriate and accessible, particularly for applicants and organisations in regional and remote areas.
- collaborated with NDIS service providers and workers to provide clear guidance on compliance with worker screening requirements, reducing administrative errors and promoting best practices.

QWSS staff were also provided with comprehensive training to ensure they could effectively perform their duties and address the complexities of the system which included:

- introductory and ongoing training and support to ensure all officers perform their duties as required and to ensure they understand the complexities of the system and the requirements of the WWCA and DSA.
- cultural capability training contextualised for the sector and operating environment, with a focus on First Nations communities.



- trauma-informed training to support applicants and stakeholders engaging with the system.
- domestic and family violence, child protection and mental health training.
- vicarious trauma training.

## Model practice 5: Be transparent and accountable in actions

### Supporting principles:

- where appropriate, regulatory frameworks and timeframes for making regulatory decisions are published to provide certainty to stakeholders.
- decisions are provided in a timely manner, clearly articulating expectations and the underlying reasons for decisions.
- indicators of regulatory performance are publicly available.

### Evidence to support alignment with regulator model practice

QWSS is bound by strict confidentiality provisions under legislation and can only disclose limited information regarding individual and organisational compliance matters. QWSS provides information about outcomes where appropriate to the individual or organisation to whom they relate.

In circumstances where a blue card or a disability worker screening applicant receives an adverse outcome, they are provided with a detailed 'reasons document' which outlines the considerations and assessment undertaken by QWSS.

QWSS produced extensive and detailed internal reports to track past and present performance. Reporting data informed planning and decision-making. It was used to track progress and impact and to identify trends/issues as they emerge in the regulatory environment.

BCS published statistical data on its website each quarter last financial year on the:

- size of the blue card system in Queensland.
- strength of the safeguards the system provides to children.
- support provided to applicants, employers and community groups to increase blue card system participation.
- number of child-related organisations corresponded with to support blue card compliance.
- number of checks undertaken with regulated organisations about persons prohibited from working with children.
- number of compliance issues finalised through appropriate enquiries, engagement and escalation where required.

BCS also published its compliance priorities in its [Compliance and Enforcement Policy and Priorities](#).

In the Department of Justice [Annual Report 2024-25](#) QWSS reported:

- the cost per finalised blue card application was \$118.
- the cost per finalised disability worker screening application finalised was \$177.
- average time to finalise a blue card application (where no assessable police or other relevant information is returned) was 2 business days.
- 1,372,210 Queensland blue card and disability worker screening card holders were monitored for changes in criminal history and other relevant information<sup>1</sup>.
- 3,712 individuals were prevented from working with children.
- 545 individuals were prevented from working with people with disability.
- 385,1611 blue card applications were finalised.
- 57,674 disability worker screening applications were finalised.

<sup>1</sup> Blue Card Services processes a wide range of applications beyond those encompassed within blue card timeliness measures, including applications for exemption cards or to cancel a negative notice, criminal history changes, eligibility declarations, as well as blue card applications from applicants who have also made a disability worker screening application. This statistic represents the total Blue Card Services figure across all applications.