

2 October 2026

Ms Lynda Pretty
Committee Secretary
Education, Arts and Communities Committee

By email to: eacc@parliament.qld.gov.au

Dear Ms Pretty

Question on Notice: Inquiry into the Queensland Protection Commission Bill 2026

At the public hearing for the Queensland Protection Commission Bill 2026 (the Bill), on 30 September 2026, I took on notice two questions from Ms Corrine McMillan MP, Member for Mansfield (Deputy Chair), and Mr Luke Richmond MP, Member for Stafford, on behalf of the Queensland Human Rights Commission (the Commission).

The Commission appreciates the opportunity to respond to these questions.

The question from Ms McMillan enquired whether I had reviewed the Crime and Corruption Commission's submission and if so, whether I agree with their proposal to require publication of ministerial directions contemporaneously through the parliament to increase transparency.

The Bill proposes that the Queensland Protection Commissioner is to be subject to the direction of the Minister when performing a function of the Queensland Protection Commissioner under the Bill, other than a function mentioned in section 7(1)(e) and (f).¹ The Commissioner will be required comply with a direction from the Minister.²

This means the Minister will be empowered to direct the Queensland Protection Commissioner in how they carry out their functions, including their functions to provide oversight of the child protection system and to analyse and evaluate policies and practices relevant to the child protection system and the performance of relevant agencies (including the Minister's agency) in delivering services.³

The Bill proposes that the Queensland Protection Commissioner include, as part of their annual report, the details of any ministerial directions in the financial year and actions taken as a result of the direction.⁴

¹ Queensland Protection Commission Bill 2026, cl 28.

² Queensland Protection Commission Bill 2026, cl 28(2).

³ Queensland Protection Commission Bill 2026, cl 28(1), cl 7.

⁴ Queensland Protection Commission Bill 2026, cl 83(2)(c).

As noted by Ms Kathryn McMillan KC, acting Chairperson, Crime and Corruption Commission, in her submission, there could be a considerable delay (up to 15 months) between the making of a ministerial direction and the direction being made public.⁵

In circumstances where the details of a ministerial direction are not made public until some months later, Parliament and the public will be limited in their capacity to intervene constructively where a ministerial direction raises practical or other concerns. Similarly, they will be limited in their capacity to understand the context in which the Commissioner's functions were performed at the time those functions were exercised.

As noted in our submission on the Bill, robust scrutiny and transparent reporting can strengthen public confidence and support better outcomes for children's human rights.

On this basis, I agree with Ms McMillan's submission that transparency may be enhanced by requiring that ministerial directions be published contemporaneously by tabling the direction in Parliament and/or by publication on the proposed Queensland Protection Commission website.

I note that contemporaneous publication of ministerial directions would also be consistent with the proposed approach in relation to the publication of a statement of expectations, which may be provided by the Minister to the Queensland Protection Commissioner to guide their activities to improve the safety and wellbeing of children and young people.⁶ Consistency across reporting requirements may support administrative clarity as well as transparency and accountability.

The question from Mr Richmond enquired whether I consider that deferring the Queensland Protection Commission's first annual report until 31 October 2028 raises concerns about transparency and accountability that warrant requiring an interim public report.

As outlined above, the Bill proposes that the Minister be permitted to provide a direction to the Queensland Protection Commissioner, which the Commissioner must comply with.⁷ The details of the direction and actions taken in response must be included in an annual report.⁸

As a result, the annual report will be an essential mechanism for transparency and accountability, because it will ensure Parliament and the public have visibility of the directions and can make their own assessments as to their appropriateness or practical impacts.

⁵ Crime and Corruption Commission, Submission No 015 to the Education, Arts and Communities Committee, Queensland Parliament, *Inquiry into the Queensland Protection Commission Bill 2026* (18 September 2026) 2-3.

⁶ Queensland Protection Commission Bill 2026, cl 29(3).

⁷ Queensland Protection Commission Bill 2026, cl 28.

⁸ Queensland Protection Commission Bill 2026, cl 83(2)(c).

The Bill indicates the Queensland Protection Commission will be established from 1 February 2027. This means the nature and content of a ministerial direction provided may not be published for a period of 22 months. This will significantly limit transparency in relation to the operation of this crucial organisation during the critical period of the organisation's establishment.

On this basis, I agree that deferring the first annual report until 31 October 2027 may create some transparency and accountability issues. I therefore suggest the Committee consider whether these issues could be resolved through contemporaneous reporting of ministerial directions or an interim report.

In making these comments I acknowledge that there are practical difficulties associated with producing an annual report following a period of organisational change. As such, if the Committee is minded to recommend that an interim report be required, I suggest there be close consultation with the new Queensland Protection Commissioner and relevant parties on what should be included in that report.

Again, thank you for the opportunity to provide a further response to these questions.

Kind regards,



Ms Debbie Platz APM

Commissioner
Queensland Human Rights Commission