

**Submission:
Integrity Commission
Amendment Bill 2026**

April 2026



Laurel House
SEXUAL ASSAULT SUPPORT
COUNSELLING • EDUCATION • ADVOCACY • CHANGE



Acknowledgement of Country

Laurel House acknowledges and pay respect to the Palawa, who are the Traditional Custodians of the land and waters of Lutruwita. We pay respects to Elders past and present. We particularly acknowledge the resistance and resilience of those Aboriginal people who have experienced sexual violence.

Acknowledgement to Victim-Survivors

Laurel House also honour and acknowledge the victim-survivors of child sexual abuse and other forms of sexual violence. We recognise the immense strength it takes to confront and heal from these traumatic experiences. We commit to amplifying your voices, advocating for change, and standing side by side on the path to healing and recovery.

Disclaimer:

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About Laurel House

Laurel House — the North and North-West Tasmanian Sexual Assault Support Service — was established in 1988. Our vision is that everyone acts to prevent and respond to sexual harm, and our purpose is to drive change through counselling, education and advocacy.

We are a not-for-profit, community-based specialist service providing trauma-informed, evidence-based therapeutic support to victim-survivors of sexual assault, as well as their families and supporters. Our services include face-to-face counselling across Launceston, Devonport and Burnie, outreach throughout the North and North-West regions, and 24/7 telephone support, including assistance with police and forensic medical processes.

Laurel House partners with the Tasmanian Government to deliver the Arch Centres—multidisciplinary hubs for victim-survivors. The Northern Arch opened in 2023, and the North-West Arch Centre is in development for opening in February 2026. With Engender Equality, we deliver the Primary Care Family and Sexual Violence program, supporting primary health professionals to better respond to family and sexual violence, including child sexual abuse.

We also provide specialist programs for children and young people displaying harmful sexual behaviours with tailored place-based programs designed for the North and North-West. From 2026, we will partner with Women's Legal Service Tasmania to deliver justice-navigation and restorative justice initiatives under the Commonwealth's new specialised sexual violence legal service pilot.

Our team delivers community education and capacity-building programs focused on preventing sexual harm and strengthening safe, confident responses to disclosure.

Laurel House also plays a key role in policy and advocacy, including through our Lived Experience Engagement Program (LEEP), which centres victim-survivor expertise in shaping our services and broader system reform. LEEP includes trauma-informed advocacy and peer support streams, enabling victim-survivors to influence policy, strengthen organisational practice, and provide connection and validation for others through peer-led support.

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Introduction

Laurel House welcomes the opportunity to provide feedback on the Integrity Commission Amendment Bill 2026.

Laurel House is a specialist sexual assault support service working across Northern and North-West Tasmania. Our work spans:

- child sexual abuse
- sexual violence against adults
- harmful sexual behaviours
- prevention and community education
- policy and systems advocacy

Through this work, we support victim-survivors navigating a range of systems, including:

- criminal justice processes
- civil and administrative pathways
- workplace and institutional complaints mechanisms
- regulatory and integrity bodies

This provides us with a system-wide understanding of how reporting, accountability and integrity frameworks operate in practice.

This submission builds on earlier feedback relating to mandatory notification reforms and reflects both:

- the findings and intent of the Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings (COI)
- broader insights from working across the full spectrum of sexual violence

Overall Position

Laurel House supports the intent of the Bill to:

- strengthen the functions and powers of the Integrity Commission
- improve clarity and efficiency in investigative processes
- enhance accountability across the public sector

The COI highlighted critical systemic failures in how institutions respond to sexual harm, including cultures of silence, misuse of power, fragmented accountability, and barriers to reporting. These findings provide a vital foundation for reform.

The patterns identified through the COI are not confined to institutional child sexual abuse. They reflect broader systemic dynamics that are also present across other forms of sexual violence.

Integrity Commission reform must therefore build on the intent of the COI while also reflecting the full spectrum of sexual violence, including harm experienced:

- across the lifespan
- in institutional, community and professional settings
- in both public and private contexts
- in situations shaped by power, authority, trust and access

Across these contexts, consistent systemic challenges arise:

- barriers to reporting
- misuse of power and authority
- fragmentation across systems
- risk of re-traumatisation through processes

Importantly, while the Integrity Commission's role is not to oversee private conduct in general, there are circumstances where conduct occurring outside a formal public role remains directly relevant to integrity. This is particularly the case where:

- the individual holds a position of power, authority or trust
- that position has enabled, influenced, or is connected to the conduct
- the conduct raises legitimate concerns about the individual's integrity, judgement, or risk within their public role

In these circumstances, the distinction between "public" and "private" conduct becomes less clear and excluding such behaviour risks overlooking patterns of misconduct that are fundamentally linked to power and authority.

Extending the principles of the COI in this way strengthens rather than dilutes its intent, by ensuring that the same systemic failures are not reproduced elsewhere.

If reforms are framed too narrowly, there is a risk that significant forms of misconduct are not captured, victim-survivor experiences are not adequately reflected, and accountability mechanisms remain incomplete.

1. Embedding a Victim-Survivor Centred Integrity Framework

Issue

The Bill strengthens procedural elements such as:

- assessment processes
- investigative powers
- referral mechanisms

However, it does not explicitly embed:

- trauma-informed practice
- victim-survivor rights and safety
- culturally safe and inclusive approaches

Context

The Commission of Inquiry demonstrated the consequences of systems that prioritise process over people. These dynamics are not unique to institutional settings.

Across all forms of sexual violence, victim-survivors may experience:

- fear of not being believed
- fear of retaliation or consequences
- confusion about reporting pathways
- distress associated with repeated disclosures
- retraumatisation within systems intended to support or protect them

Without explicit safeguards, strengthened reporting and investigative processes risk:

- increasing engagement without improving outcomes
- placing additional burden on victim-survivors
- reproducing patterns of harm identified by the Commission of Inquiry

Recommendations

1.1 Amend Section 9 (Principles of operation) to explicitly include:

- trauma-informed practice
- prioritisation of victim-survivor safety, dignity and autonomy
- culturally safe and inclusive approaches

1.2 Require operational guidelines that include:

- clear and proactive communication with victim-survivors
- minimisation of need for repeated disclosures
- training in trauma-informed practice and inclusion for relevant staff
- coordination with specialist support services

2. System Fragmentation and Overlapping Jurisdictions

Issue

The Bill strengthens the Integrity Commission's role but does not sufficiently address how it interacts with existing systems.

Context

The Commission of Inquiry identified fragmentation and silos between institutions as a key contributor to system failure.

This fragmentation continues to be reflected more broadly across systems responding to sexual violence, including:

- criminal justice processes
- regulatory bodies
- workplace complaint mechanisms
- child safety frameworks

These systems have distinct purposes but often operate in parallel or, at worst, counter to each other.

Impact

Without integration:

- victim-survivors may be required to engage with multiple processes
- investigations may overlap or occur simultaneously
- responsibility for coordination may fall on individuals
- systemic accountability may be diluted

Recommendations

2.1 Establish integrated reporting and investigation pathways that:

- clarify roles and responsibilities across agencies
- reduce duplication
- support coordinated responses

2.2 Implement a “no wrong door” approach to reporting, ensuring that:

- disclosures are appropriately triaged
- coordination occurs between systems
- individuals are not required to navigate complexity alone

3. Definition and Recognition of Sexual Misconduct

Issue

The Bill does not include a clear definition of sexual misconduct.

Context

The Commission of Inquiry demonstrated how harmful behaviours, including grooming and abuse of power, were not always recognised or responded to appropriately and these risks extend beyond institutional settings.

Sexual misconduct often involves coercion and manipulation, exploitation of trust and abuse of authority. It can occur across:

- workplaces
- community organisations
- professional relationships
- online environments
- private and informal contexts

Impact

Without clear recognition:

- misconduct may be minimised or misclassified
- patterns of behaviour may be missed
- responses may be inconsistent

Recommendations

3.1 Amend Section 4 (Interpretation) to include a definition of “sexual misconduct” that includes:

- child sexual abuse
- sexual assault
- sexual harassment
- grooming
- sexual exploitation
- technology-facilitated abuse
- attempts of any of the above

3.2 Ensure guidance includes:

- recognising grooming and coercion
- understanding power dynamics
- intersectionality and marginalisation
- stigma-aware responses

4. Conduct Outside Public Authority (“Private Capacity”)

Issue

Limiting misconduct to conduct within formal duties does not reflect how sexual violence occurs in practice.

Context

The Commission of Inquiry highlighted how harmful behaviours can occur in environments where oversight is limited and power dynamics are not formally recognised.

Similarly, sexual misconduct may occur:

- outside formal workplaces
- but in contexts influenced by professional authority, status or access

Impact

Excluding such conduct risks:

- overlooking patterns of harmful behaviour
- limiting visibility of serious misconduct
- allowing institutions to treat misconduct as a “private matter”
- undermining public trust
- missing opportunities for prevention

Recommendation

4.1 Amend the Bill to include an obligation on mandatory notifiers to report sexual misconduct by POs or DPOs in their private capacity.

4.2 Ensure that sexual misconduct in a private capacity is reportable where it:

- relates to a person’s role, authority or access
- impacts public trust or institutional integrity
- raises concerns about misuse of power

5. Strengthened Investigative Powers and Safeguards

Issue

The Bill introduces strengthened investigative powers.

Context

While stronger powers are necessary for accountability, the Commission of Inquiry also highlighted the importance of systems being experienced as fair, transparent and safe.

Impact

Without safeguards:

- processes may become less transparent
- individuals may feel excluded
- trust in the system may be reduced

Recommendations

5.1 Introduce safeguards to ensure:

- transparent and accessible processes
- clear communication with affected individuals
- access to appropriate support

6. Workforce Capability and System Readiness

Issue

Legislative reform must be supported by workforce capability.

Context

The Commission of Inquiry highlighted the role of workforce knowledge, culture and leadership in shaping system responses.

These issues remain relevant across all systems responding to sexual violence.

Impact

Without investment:

- reforms may not be implemented effectively
- inconsistency in practice may persist
- risks to victim-survivors remain

Recommendations

6.1 Deliver coordinated training across sectors, including:

- understanding reporting obligations
- responding to disclosures of sexual violence
- trauma-informed practice
- recognising sexual misconduct

Conclusion

The Integrity Commission Amendment Bill 2026 represents an important step in strengthening Tasmania's integrity framework.

The Commission of Inquiry provides a critical foundation for this reform. Its findings must remain central to how systems are designed and implemented.

At the same time, ensuring these reforms are effective requires applying those lessons across the full landscape of sexual violence.

This includes:

- embedding victim-survivor centred practice
- recognising sexual misconduct in all its forms
- addressing fragmentation across systems
- ensuring accountability extends beyond formal institutional settings

Applying the lessons of the Commission of Inquiry more broadly strengthens the integrity system as a whole and helps ensure that the failures it identified are not repeated in other contexts.

Laurel House welcomes continued engagement to support reforms that are effective, inclusive and grounded in lived experience.



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