



Safeguarding Australia: Strengthening Systems to Protect Children & Vulnerable Australians

November 2025

Five ideas for policy reform as Australia's current right-to-work and credential verification systems fall short of the safeguarding standards that vulnerable populations deserve.

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Table of Contents

Section 1: Building a National Safeguarding Systems Framework	3
1. Executive Summary	3
2. Purpose & Scope	5
3. Current Challenge: The Cost and Complexity of Reform	6
4. The Economic Cost of Inadequate Safeguarding	8
5. The Human & Social Impact of Safeguard Failure	9
6. The Economic Case for Reform	11
7. Case Studies	16
Section 2: Informing Safeguarding Policy Design Pathways	20
8. The Pathway to Reform	20
9. Technology Environment Required	22
10. Preliminary Cost Avoidance of Fixing Safeguarding System Failures	22
Background Information: Oho	26



Section 1: Building a National Safeguarding Systems Framework

1. Executive Summary

There has never been a more compelling or critical opportunity to review, reform, and rebuild Australia's safeguarding systems to protect children and vulnerable people across the country.

Following three Royal Commissions¹ and recent high profile media reports of abuse in childcare settings, every level of government has accepted the need for systemic reform.

More than six million Australians hold clearances to work with children or vulnerable people. However, current verification processes remain fragmented, manual, and inconsistent, leaving employers exposed and vulnerable individuals at risk.

Independent data drawn from 224,000 worker records indicates that **one in every 434 workers carries a critical safeguarding failure, such as a revoked clearance²**. Publicly available data suggests the failure rate is 1 in 3000. In either scenario, across our national workforce, this equates to thousands of unverified or unsuitable individuals currently employed in high-trust roles, leaving children and vulnerable Australians compromised.

The economic cost of care workforce **verification failures is estimated at \$2.4 billion annually**, encompassing legal and regulatory fine exposure as well as staffing costs³. While these numbers are extraordinary, the human cost is immeasurable: each preventable breach represents a failure of trust, with lifelong psychological, social and intergenerational impacts for victims and families.

There have been at least 88 new child safety related workforce standard reforms since August this year.

At the same time, new regulatory frameworks, including the Aged Care Act 2024, Child Safe Organisations Act 2024 (QLD), and VIC Child Safe Standards (2023) are raising compliance expectations for all providers, requiring them to upskill, implement stronger safeguarding measures, and upgrade current technologies. However, without modernised verification systems, employers risk breaching these standards even when acting in good faith.

System gaps exist and are unseen by regulators, representing a major risk to child safety reform success. **Oho estimates 27 percent⁴ of this work and volunteer force are unmonitored.** The cause of this blind spot is the difficulty employers have linking and verifying large groups of new and existing employees to government systems at the scale and frequency required to be compliant. The reality is that many employees do not make it to the registers to be monitored in the first place, despite employers' best efforts.

¹ Royal Commissions: Institutional Responses to Child Sexual Abuse (2017), Violence, Abuse, Neglect and Exploitation of People with Disability (2023), and Aged Care Quality and Safety (2021).

² Oho, 2025. Anonymised, aggregated data.

³ See Section 6: Economic Case for Reform for calculations

⁴ Section 3.1: Systems Gaps Impacting Employers and Government

It is critical that the government and employers have the same lens on verification, which can only be delivered by leveraging technology and data frameworks to safeguard all vulnerable populations nationally.

This paper proposes a five-idea plan to deliver a national safeguarding systems framework that can close existing gaps and transform verification from a compliance burden into a proactive protection system. It also outlines an accelerated implementation path that strengthens accountability, prevents system failures, and drives rapid reform through the adoption of data-led technology.

The five step national safeguarding systems reform framework:

1. **National mutual recognition:** Align credential recognition and workforce clearance standards across all jurisdictions in Australia (endorsed by Council of Attorney General's but some jurisdictions are yet to introduce enabling legislation).
2. **Continuous verification:** Enable live, automated linkage between employers and government registers (not just government to government systems) to capture and notify of changes in real time.
3. **Technology accreditation:** Establish a national accreditation platform for secure, API-enabled technology partners to act as integration layers between 23+ government systems and at least as many employer systems.
4. **Transition support:** Assist small and regional employers to modernise workforce verification systems and reduce administrative burden.
5. **Culture of prevention:** Embed safeguarding accountability from board level through to frontline practice, supported by education and transparent reporting.

Implementing these five ideas would deliver measurable benefits: reduced harm, restored public confidence and trust, and a potential economic saving of over \$2 billion annually through prevented incidents and compliance efficiency⁵.

By linking data, standardising systems, and embedding prevention at every level, Australia can protect its most vulnerable citizens while setting a global benchmark for technology-enabled safeguarding.

Expected Outcomes:

1. **Improved protection** for over 12.4 million Australians in the care, education, and community sectors, and stronger oversight of workforce.
2. **Economic saving** exceeding \$2 billion annually⁶ through prevented incidents, reduced litigation, and streamlined compliance.
3. **Better public trust and confidence** in the integrity of Australia's right to work systems and the workforce enabled by these systems.
4. **Accelerated implementation** that sets a standard for the appropriate use of technology in enabling good policy.

^[1] Section 6: The Economic Case for Reform

^[1] Section 9: Preliminary Cost Avoidance of Fixing Safeguarding System Failures

2. Purpose and Scope

This white paper supports the next phase of Australia's safeguarding reform agenda with five policy and execution ideas to scale and accelerate policy implementation. It builds on and complements the existing reform activity being undertaken across Australia, targeting the gaps between government and employers when safeguarding.

By providing objective, evidence-based and practical insights, the paper aims to help governments, regulators, employers, and sector leaders strengthen verification systems that protect children and vulnerable people.

Key information gaps are highlighted between the government and employers. It draws on:

- publicly available data from national, state, and territory regulators used to quantify the size of challenges,
- public policy research, informing the impacts of safeguarding failures,
- recent Royal Commissions and policy reforms, and
- aggregated, anonymised, employer-side system data on time and costs invested in point in time compliance of right-to-work credentials

There are five key sectors where credentialing underpins public safety and trust. These include early learning, disability support, aged care, sport, and community. Across these five sectors we have publicly available data representing approximately six million working Australians⁷.

This paper intends to inform public policy by clarifying risks, quantifying both economic and human costs, and offering five ideas that are required to create a consistent, transparent safeguarding framework that earns the enduring trust of Australian families and communities.

Limitations and Future Research

The preliminary quantification of employer and policy maker exposure to continuing with current mandatory screening systems uses transparent calculation methods based on publicly available legal claim, and regulator fine data. The paper also uses employers staffing costs and research backed social costs, rather than attempting comprehensive economic modelling.

This pragmatic approach has limitations. The analysis is designed to prompt timely consideration by policy makers and care sector leaders, not to serve as definitive economic research. For policy makers seeking to budget safeguarding solutions, more sophisticated economic modelling would be valuable. Future research could include:

- Comprehensive cost-benefit analyses using primary data collection
- Longitudinal studies tracking actual implementation costs and outcomes
- Sector-specific economic modelling accounting for variations in employer profiles
- Analysis of opportunity costs and alternative safeguarding approaches

⁷ Oho, 2025. Submission to Treasury Consultation: National Approach to Worker Screening in the Care and Support Economy. (See Q13 and Q5.)



3. Current Challenge: The Cost and Complexity of Reform

“Critical weaknesses remain in right-to-work credential systems, which are a cornerstone of **proactive safeguarding and compliance assurance.”**

Consecutive Australian Governments have introduced numerous reforms designed to **strengthen safeguarding and rebuild public confidence** in response to Royal Commissions and accelerated by distressing media reports of alleged paedophiles.

The Federal Attorney General’s leadership in August 2025 set in motion important reforms to allow a person with a working with children **check banned in one jurisdiction to be tracked and banned across the country**. This important reform is underpinned by the National Continuous Checking Capability.

Australian states and territories are now in the process of reviewing, introducing, and passing important legislation, which will transform government-to-government system data sharing.

The **Victorian Child Safe Standards**, which came into effect on 1 July 2022, now require all employers working with children to implement ten core child-protection principles. Similarly, Queensland’s Child Safe Organisations Act, introduced in a staged rollout from 1 October 2025, establishes an equivalent set of ten mandatory features designed to embed a culture of child safety and accountability. However, not all states and territories have been able to uplift at the same speed, partially due to inadequate technology systems.

Building on this momentum, the Victorian Rapid Child Safety Review (commissioned July 2025) delivered **22 recommendations to enhance standards in early childhood education and care**, which were all accepted by the Premier in August 2025. At the national level, the Aged Care Act 2024 commenced on 1 November 2025, representing a landmark shift to a rights-based framework that redefines provider obligations, workforce verification requirements, and transparency in service delivery for older Australians. These changes, alongside new safeguarding measures announced in New South Wales in late 2025, demonstrate a strong policy response and an evolving regulatory landscape.

Despite this positive progress, **critical weaknesses remain in right-to-work credential systems**, which continue to force employers to rely on fragmented, manual processes in their dutiful attempts to comply with new requirements. These processes cannot deliver continuous, real-time verification of workforce suitability, providing the time and space for bad actors to thrive.

3.1 System Gaps Impacting Employers and Government

When a right-to-work check is flagged as revoked or suspended, **employers rely on periodic manual reviews or register notifications, phone calls, emails, or even a letter.** These processes can take days, weeks, or even longer if employers are only conducting an annual review.

In some jurisdictions, workers with multiple employers can change their nominated employer without notification, meaning any changes to their clearance status will go unnoticed.

Without a stronger and more robust system in place, **employers do not have the knowledge to act and intervene when needed.** This creates **blind spots across the care sector where unsuitable workers may continue to engage with vulnerable populations.** Employers are expected to maintain continuous workforce assurance, yet they lack the tools to do so effectively. This leads to delayed detection, preventable risk, and also vision gaps that government agencies are not able to detect.

The following infographic depicts the progress in government-to-government systems and the **glaring gap between government-to-employer systems**⁸. This example is limited to working with children checks. It is not difficult to see how this is further compounded when you factor in the 18 or more other checks that workers and carers need in disability, aged care, education, and allied health settings.

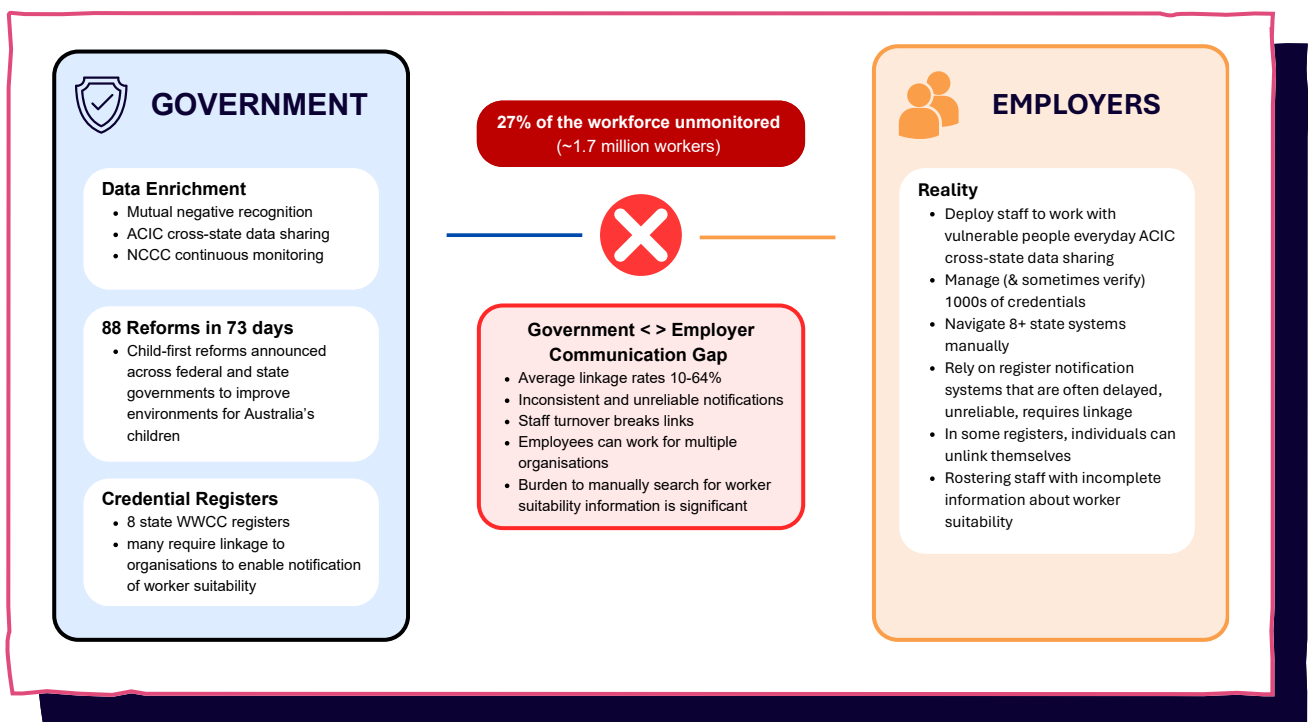


Figure: Data Visualisation of Employer and Government System Gaps in Right-to-Work Safeguarding⁹

⁸ Federal Attorney General's Office, 2025. Child Safety Reforms, <https://ministers.ag.gov.au/media-centre/delivering-urgent-reform-working-children-checks-15-08-2025>

⁹ Publicly available data on child safety reforms, right to work registers and Oho's anonymised, aggregated employer side data, 2025.

The economic and administrative burden of this gap is significant. As regulation intensifies, employers face escalating costs associated with compliance management, verification backlogs, insurance exposure, and reputational risk. Many providers, particularly in childcare, disability, and aged care are stuck between the increasing expectations of safeguarding assurance against the significant cost of maintaining manual credential checks.

This issue is broadly overlooked in the current discourse on safeguarding. The section below will highlight and quantify the true cost of these policy gaps, and present evidence-based solutions that balance compliance efficiency with public protection.

For employers, it outlines practical measures to streamline right-to-work verification while reducing cost and liability.

For policymakers, it provides an assessment of reform progress, the economic benefits of modernising credential systems, and seeks to inform future safeguarding policy considerations, and the critical actions needed to ensure these once-in-a-generation reforms achieve their intended outcomes quickly.

4. The Economic Cost of Inadequate Safeguarding

The rising cost of compliance is only one dimension of the safeguarding challenge. Beneath it lies a deeper and more costly inefficiency: the continued reliance on fragmented, manual verification processes that can fail to alert employers of credential lapses before harm occurs.

As regulation intensifies across early learning, aged care, disability, and community sectors, these outdated systems are creating an economic drag that undermines reforms that are designed to strengthen protection.

Analysis of aggregated national and anonymised employer data indicates that safeguarding failures now impose **a direct annual cost of \$2.4 billion on Australia's economy**¹⁰. These costs include investigations, legal proceedings, compensation and associated insurance premiums. It does not include workforce disruption, and the delivery of long-term health and social services to affected individuals.

For employers, especially small and medium providers, this burden is compounded by the administrative overhead of manual credential checking. Manual processes can consume hundreds of thousands of dollars in staff time each year without delivering reliable assurance.

The scale of these potential and actual losses demonstrates that prevention is not merely a moral obligation but a clear fiscal imperative. Every improvement in right-to-work verification, even modest automation or system integration, delivers measurable national savings, reduces employer exposure, and prevents the incalculable human and social cost of abuse.

¹⁰ Section 6: The Economic Case for Reform

5. The Human & Social Impact of Safeguard Failure

Behind every safeguarding failure is an immeasurable human cost. This is why prevention through robust right-to-work verification is not merely an administrative exercise, it's essential.

Immediate Psychological Impact

The human toll of abuse within care settings is profound, with studies indicating that up to 88 percent of those affected may never disclose their experiences. Childhood maltreatment is linked to 40 percent of mental health conditions¹¹, while survivors of child sexual abuse account for 34 percent of all presentations across the mental health sector¹². The psychological aftermath includes complex Post-Traumatic Stress Disorder, with intrusive thoughts, flashbacks, emotional numbing, and social isolation. For vulnerable adults, 4.4 percent of people aged 65 years and over experience abuse or neglect annually¹³, representing thousands whose trust has been violated by those meant to care for them.

Educational and Employment Consequences

Abuse fundamentally disrupts life trajectories. Educational underachievement is widespread among survivors, often resulting in failure to obtain necessary workplace skills and qualifications. A male survivor of child sexual abuse is twice as likely to be out of work due to illness¹⁴, while unemployment becomes more likely among all survivors regardless of education level. This creates cascading effects on lifetime earning capacity, with differences of up to \$1.5 million in lifetime consumption.



Survivors of child sexual abuse account for 34 per cent of all presentations across the mental health sector¹².

¹¹ NSW Health, 1998. Child sexual abuse: Information for mental health professionals. NSW Department of Health

¹² NSW Health, 1998. Child sexual abuse: Information for mental health professionals. NSW Department of Health

¹³ Australian Bureau of Statistics, 2016. Personal Safety, Australia, 2016. Cat. no. 4906.0. Commonwealth of Australia.
<https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia>

¹⁴ Economic and Social Research Institute & Trinity College Dublin, 2013. Irish Longitudinal Study on Ageing. <https://www.esri.ie/>

Relationship and Social Damage

Abuse fundamentally damages victim survivor capacity to form healthy relationships throughout their lives. Early maltreatment negatively affects the ability to establish and maintain intimate relationships in adulthood, interfering with a sense of self and self-esteem¹⁵. A history of child sexual abuse is associated with insecure attachments and increased relationship breakdown, often creating intergenerational cycles of trauma.

Self-Destructive Coping and Ultimate Cost

Survivors often develop harmful coping strategies, including substance abuse, with those experiencing multiple childhood traumas being 7 times more likely to have serious alcohol problems¹⁶ and 4 times more likely to smoke¹⁷. Abuse in childhood raises obesity risk by 66 percent in males and 27 percent in females¹⁸.

Most devastatingly, 32 per cent of child sexual abuse victims attempt suicide, with 43 per cent considering it¹⁹. Adults experiencing four or more adverse childhood experiences are 12 times more likely to attempt suicide²⁰.

Intergenerational Impact and Breaking the Cycle

The human cost of poor safeguarding extends beyond individual victims to their children, creating disadvantage across generations. This generational cycle can be broken when parents address their trauma, leading to better outcomes for their children.

The evidence is clear: when survivors receive early support and when systems prevent harm before it occurs, outcomes improve dramatically²¹. Trauma does not have to be destiny. Strengthening verification systems, embedding continuous monitoring, and ensuring every organisation is accountable can help break this cycle, **protecting not just the vulnerable today, but generations to come.**

¹⁵ Mullen, P. E., & Fleming, J., 1998. Long-term effects of child sexual abuse. Issues in Child Abuse Prevention, No. 9, National Child Protection Clearinghouse, Australian Institute of Family Studies. <https://aifs.gov.au/resources/policy-and-practice-papers/long-term-effects-child-sexual-abuse>

¹⁶ Felitti, V. J., Anda, R. F., Nordenberg, D., et al., 1998. Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults: The Adverse Childhood Experiences (ACE) Study. American Journal of Preventive Medicine, 14(4), 245-258

¹⁷ Centers for Disease Control and Prevention, 1998. Adverse Childhood Experiences (ACE) Study. Atlanta, GA: National Center for Injury and Control. <https://www.cdc.gov/violenceprevention/acestudy/>

¹⁸ Kezelman, C., Hossack, N., Stavropoulos, P., & Burley, P., 2015. The Cost of Unresolved Childhood Trauma and Abuse in Adults in Australia. Blue Knot Foundation and Pegasus Economics, citing Californian studies 2007-2009. <https://blueknot.org.au/resources/publications/>

¹⁹ Plunkett, A., O'Toole, B., Swanston, H., Oates, R. K., Shrimpton, S., & Parkinson, P., 2001. Suicide risk following child sexual abuse. Ambulatory Pediatrics, 1(5), 262-266.

²⁰ Felitti, V. J., Anda, R. F., Nordenberg, D., et al., 1998. Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults: The Adverse Childhood Experiences (ACE) Study. American Journal of Preventive Medicine, 14(4), 245-258.

²¹ The Front Project. (2021). How Australia can invest in children and return more: The cost of late intervention. Melbourne: The Front Project. Retrieved from https://www.thefrontproject.org.au/images/downloads/THE_COST_OF_LATE_INTERVENTION/Summary_report_How_Australia_can_invest_in_children_and_return_more.pdf

6. The Economic Case for Reform

Australia's fragmented right-to-work verification system is failing at scale, imposing escalating costs on governments, service providers, and communities. Current manual and disconnected credential processes are not stopping unsuitable individuals from accessing high-trust roles across the early learning, aged care, disability, sport, and community service sectors.

Analysis of aggregated and anonymised workforce verification data across 224,000 employees, carers, and volunteers versus data from the working with children registers shows that **one in every 434 to 3000 workers (respectively) carries a "red flag"**, a revoked or suspended credential that should disqualify them from working with vulnerable populations.

The above data range is consistent with findings in New South Wales, where over 700 missing, expired, or unverified Working With Children Checks (WWCCs) were identified within the childcare sector alone.

When extrapolated nationally, up to 27 per cent of credentials remain unmonitored and 15 per cent are revoked, expired, or invalid²².

This gap represents a national compliance shortfall affecting hundreds of thousands of workers and exposing millions of Australians to avoidable risk.

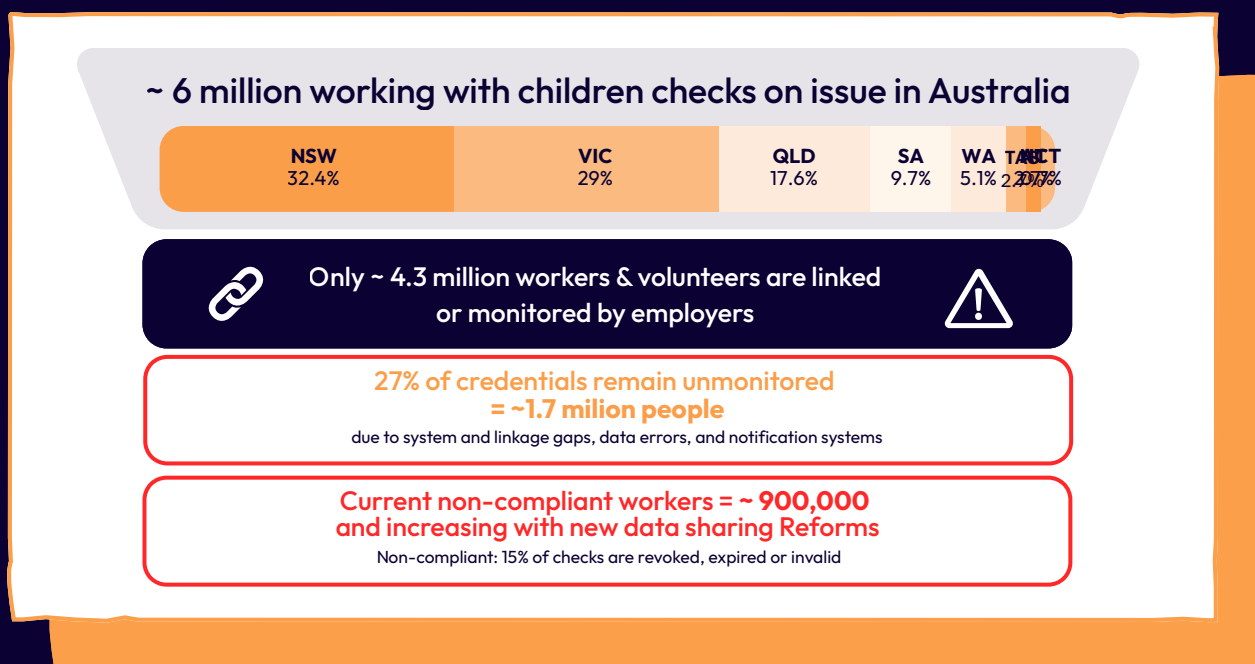


Figure: Data Visualisation of the scale of Australia's WWCC monitoring gap²³

²² Oho 2025. Oho's anonymised, aggregated data. Estimated 27% of unmonitored workers of WWCCs before they implement continuous checking solutions with Oho.

²³ Author's calculation based on Oho database and publicly available data, 2025. Estimated proportion of unmonitored workers of WWCC alone using anonymised, aggregated employer side data before they implement continuous checking solutions with Oho up to 27%.

National Cost Burden Data

The estimated average financial cost of safeguarding failures across Australia's care and education sectors, employing approximately 6 million people is **\$2.4 billion annually**²⁴. These figures only include legal redress, associated insurance claims and regulator fines. The costs do not include healthcare and rehabilitation, investigations, lost productivity, and workforce disruption

Metric	Low Estimate	High Estimate	Assumptions and Data Sources
Credential failure rate	0.05%	0.23%	Low estimate uses the state WWCC register average revocation or suspension rate. The high estimate is based on an employer-side revocation or suspension dataset.
Revoked or suspended workers	3000	13,800	Derived from the number of workers and the failure rate.
Estimated legal cases per year	150	2,070	Applied an assumption of 5% to 15% likely rate of legal cases on total credential failures
Average economic cost per legal case	\$65,000 ²⁵	\$975,000 ²⁶	Low estimate reference National Redress settlement averages. High estimates include the highest civil litigation costs and imply insurance, productivity losses. The average maximum legal claim results in \$520,000 in employer costs.

²⁴ Cost of Inaction on Safeguarding Systems: See table above and below including assumptions and data sources.

²⁵ Royal Commission into Institutional Responses to Child Abuse, 2015. Redress and Civil Litigation.

<https://www.childabuseroyalcommission.gov.au/redress-and-civil-litigation>

²⁶ Australian civil case law (BDT v BDG [2019] QDC 74)

Potential fines from regulators per year	300	4,830	<p>Derived from revoked or suspended workers and fine rate assumptions below.</p> <p>Despite regulator fine rates on workforce non-compliance being historically low, new compliance hurdles in childcare and other sectors indicate fines will increase.</p> <p>Because of legislation set by regulators to link, verify, and deploy suitable workforces, despite system issues, we have assumed 15% to 35% of credential breaches could result in a fine. That is, they occur in circumstances where the organisation knew or should have known (knowingly or recklessly) employed an unsuitable person.</p>
Average economic cost per fine from the regulator	\$11,000	\$594,000	<p>Assumed an average maximum fine of \$279,902 based on available state regulator data below.</p> <ul style="list-style-type: none"> • Victoria: companies liable up to \$237,108 • NSW: up to \$11,000 plus imprisonment • NDIS: Employing unregistered workers - up to \$277,500 • Visa: Allowing unlawful non-citizens to work - up to \$594,000
Legal + Fine costs sub total	\$9,750,000 \$3,300,000	\$2,018,250,000 \$2,851,200,000	Adding legal and fine cost minimum and maximums.
Total national cost	\$13,050,000	\$4,869,450,000 billion	<p>We assume the low number is close to the current state, and the high number represents the real risk to the system once increased compliance penalty reforms are implemented, if the tech systems are not fixed.</p> <p>The average and likely cost of both numbers is \$2.44 billion dollars.</p>



Cost by Sector

Safeguarding failures manifest differently across regulated industries but share a common pattern: weak credential oversight leads to preventable harm and financial loss.

Given spot checks and increased penalties are part of recent child care reforms, based on average maximum fines alone, **the total exposure by sector ranges from approximately \$37M in early learning and \$336M in sport**. The estimated full breakdown by sector is below.

Sector	Estimated Workforce	Credential Failure Rate ²⁷	Fine Exposure Per Case ²⁸	Total Sector Exposure ²⁹	Risk Factors
Disability Services	325,000 ³⁰	0.23%	\$277,500	~\$207M	Intimate care, communication barriers, dependency
Aged Care	456,000 ³¹	0.05%-0.23%	\$277,500	\$63M-\$291M	Cognitive decline, staff shortages, and family oversight gaps
Sport	~1,800,000	0.05%-0.25%	\$124,504	\$112M-\$560M	Physical contact, travel, and volunteer workforce
Early Learning	200,000 ³²	0.05%-0.25%	\$124,504	\$12M-\$62M	High staff churn, staff ratios, nappy/toileting assistance, developmental vulnerability
Community Services	~300,000	0.05%-0.25%	\$124,504	\$19M-\$93M	Transient clients, limited oversight, fear of losing services

²⁷ Low estimate is from the relevant government register, and the high estimate is from aggregated, anonymised, employer side data from Oho (2025).

²⁸ Assumes all failed credentials are fined

²⁹ Total Sector Exposure equals the number of workers multiplied by the credential failure rate multiplied by average maximum fine

³⁰ Jobs and Skills Australia, 2024. Aged and Disabled Carers. <https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles/occupations/4231-aged-and-disabled-carers>

³¹ Department of Health, Disability, and Ageing, 2024. Australia's Aged Care Workforce. <https://www.health.gov.au/topics/aged-care-workforce/about#australias-aged-care-workforce>

³² Department of Education, 2024. Early Childhood Providers Workforce. <https://www.education.gov.au/early-childhood/providers/workforce/about>

Cost by Organisation Size

The estimated financial burden of manually staffed workforce credential verification varies by organisational size.

Organisation Size	Example Workforce Size	Annual Cost per Employee for Manual Checking	Total Administrative Cost (Est.)
Small (<50 staff)	50	\$62.66 ³³	≈ \$1,880
Medium (51-500 staff)	500	\$62.66	≈ \$31,330
Large (501+ staff)	5,000	\$62.66	≈ \$313,000

Insights:

- **Small employers** bear the heaviest proportional burden; limited HR capacity and high administrative overhead make compliance resource intensive.
- **Medium employers** are often growing headcount fastest, experiencing rapidly compounding costs as manual systems struggle to track existing and new hires.
- **Large employers.** While costs appear proportional to the number of employees, larger organisations get more efficiencies out of resourcing and technology but have compounding exposure to the scope of services provided.

These figures represent only direct, measurable costs. Excluded are broader impacts such as:

- Reputational damage and contract loss;
- Increased insurance premiums across entire sectors;
- Productivity loss from manual compliance; and
- Intergenerational trauma and social costs

³³ Oho, 2025. Assumption based on Oho customer feedback of 1 FTE HR admin manual checking resource of \$97,000 per year including oncosts for every 1500 staff equals \$62.66 per employee.

7. Case Studies

Case Studies from care sector leaders illustrate the challenges as well as the high impact solutions they are putting in place.

Anonymised Case Study 1

Centralising Continuous Workforce Checks Reduces Abuse Risk

Organisation Profile: Large disability service provider

Organisational Context: A registered **NDIS provider delivering disability support**, employing approximately 1,500 staff. This provider has an unwavering commitment to ensuring people lead every decision about their lives, evidenced by strong implementation of a human rights led, quality and safeguarding framework, resulting in industry awards. Employing a practice mentorship approach, this organisation champions person-led planning, communication, complex health, quality practice and positive behaviour support.

Challenge: Because this employer set a high bar on quality, safeguarding and service delivery, they wanted to take a proactive approach to workforce suitability. With multiple right-to-work credentials required per worker, linking, verifying and monitoring at recruitment and ongoing work was resource intensive, error prone, and not continuous.

Solution: This disability provider implemented Oho's workforce compliance platform to automate **continuous screening and credential verification for 1,500 workers**, and connect this information directly to their people systems, driving hiring and rostering decisions every day.

Stage 1 involved implementing an immediate standalone Oho instance.

Stage 2 involves integrating to recruitment and workforce modules of an enterprise HR system

At recruitment and as often as weekly thereafter, Oho verifies **NDIS Worker Screening Checks, Working With Children Checks, Visa Entitlements, Teacher & AHPRA Registrations** across 1,500 workers with an average of 3+ credentials to check per employee.

Impact

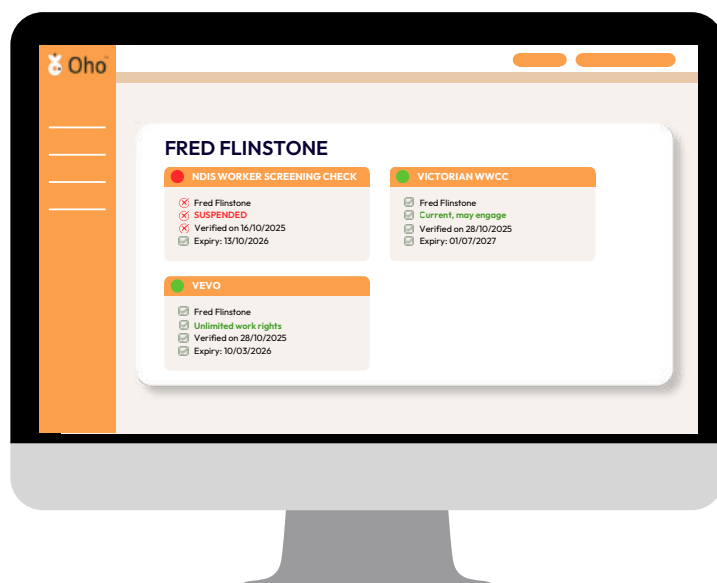
During routine weekly verification of all credentials, Oho identified a red flag (revoked or suspended) on an NDIS worker screening check, despite that same worker holding a current, valid Victorian Working with Children Check.

Oho's continuous monitoring immediately alerted their compliance team, enabling the provider to act quickly. The notification from the register was not seen by the team. They highlighted the volume of emails received from various registers they comply with as a contributing factor to this.



Takeaways:

- Workforce visibility is crucial. Immediate action prevents future incidents. A lag in government to employer communication on unsuitable workers is unnecessary.
- One unwieldy register is not a big problem. However, **most large or multi state, and multi service employers deal with on average eight government registers** to be compliant with. Integration layers or middleware between government and employer systems such as Oho are a solution to this complexity.
- Embed people receiving services in design: **establish genuine advocacy structures** where people have an active voice about the support they receive
- Investing in safeguarding is a 360-degree practice for humans and machines - implement proactive, holistic models and get your technology to take a proactive approach by continuously checking.
- Secure machines are better at repetitive tasks than humans. Manual verification can create dangerous blind spots. Automated compliance platforms such as Oho provide continuous monitoring and immediate notification to the right stakeholders, that manual processes cannot deliver at scale.
- **Weigh up the cost associated with prevention tech versus the cost of not acting:** the most important being hard to a person but also regulatory and legal risks, operational disruption, and reputational damage.



Oho verifies the various checks required for our disability workforce and alerts us immediately if anything changes. Recently, we had a situation where **someone's NDIS check was suspended, but their Working With Children Check was still valid** ... and Oho plugged the gap to provide us with real visibility. The immediate notifications to our team mean we can **act quickly and have confidence that our workforce is safe to work.**

Anonymised Case Study 2

Contractor workforce visibility is required but rare

Organisation Profile: Large education provider

Organisational Context: A large education provider operating across 6 states and territories in Australia, **employing over 3,500 people and contractors caring for over 50,000 children per week.** This provider manages a dynamic workforce with a **hiring rate of 30% per year.** The CEO is a strong advocate for child protection, with a philosophy that ensuring children are safe and feel safe is the social and moral responsibility of everyone.

Challenge: Getting **visibility of the entire workforce ongoing,** including contractors, because the regulators require it and the safety of children depends on it.

Despite government requirements to verify the whole workforce, including contractors, the practical reality in education and care settings is that this rarely occurs. Providers rely on a worker credential check the day they are employed but the recruitment companies rarely provide visibility of that worker's ongoing suitability.

For this provider, this gap was too risky. With a dispersed workforce spanning hundreds of locations, and seasonal contractors supporting peak periods like school holidays, the organisation needed complete visibility of the entire workforce to meet both regulatory compliance standards and their own benchmarks for safeguarding excellence.

Solution: This provider implemented Oho's workforce compliance platform to **remove manual workforce credential checks by continuously screening right-to-work credentials** for both permanent staff and contractors, even if hired through agencies. For this provider specifically, a special dashboard was created for their contractor workforce to provide 'snapshot' compliance and the ability to manage exceptions easily and immediately.

This approach ensured that every person working with children – whether directly employed or engaged through third parties – maintained current and valid credentials throughout their engagement with this employer.



30%

hiring rate
per year



Impact:

Example cost of inaction on a 3,500-person workforce based on fines, legal claims and manual staff costs

- Fines across two states: ~\$279K each
- 4 small and two large legal claims across 3,500 staff annually: \$65K –\$520K each
- Manual staff: \$63K for every 1000 staff
- **Potential Cost of Inaction: \$1.89M**

Return on Investment

- **42x Return on investment** in continuous workforce credential checking of \$45,000.
- Oho core subscription cost: \$35,000 (\$10 per person, workforce of 3,500 people) plus \$5000 on implementation, plus an integration fee of \$5000.

Social Return on Investment

- Impacts extend far beyond cost savings.
- Through Oho's continuous verification system, we identified **6 red flags - 6 individuals who were unsuitable to work with children**, before they could cause harm, avoiding an estimated **\$3.18M in lifetime psychological costs** on the persons abused³⁴
- **Board confidence:** peace of mind for the CEO, executive team, and board, mitigating director liability risks
- **Regulatory leadership:** the provider set a new standard for contractor workforce visibility in the education sector.
- **Commitment to families:** reinforced the organisation's commitment to child safety and provides an ongoing commitment to families and children that this employer is doing everything they can.



“Oho is part of doing all we can. They allow us to ensure continuous attention and visibility and suitability of our people to work with children and ensure ongoing robust insurance coverage. “Doing” is imperative to ensure children are safe and feel safe!”



³⁴ Child predators typically offend against an average of 1-9 children (average of 4.5), Richards. K, 2011. <https://www.aic.gov.au/publications/tandi/tandi429>, with each child experiencing lifetime psychological and economic costs averaging \$176,437. Averaged impact per predator: 4.5 X \$176,437 = \$793,966. Total prevented harm from 4 unsuitable workers: \$3.175 million.

Section 2: Informing Safeguarding Policy Design Pathways

The convergence of new legislation, API capability, and growing sector urgency presents a once-in-a-generation opportunity to build a mutually recognised, national, technology-enabled platform for right-to-work verification.

We propose a unified proactive safeguarding network founded on three principles: data connection, continuous verification, and shared accountability.

By securely linking employer systems to 23+ existing government registers and enabling real-time credential monitoring, Australia can close persistent protection gaps, reduce administrative overhead, and prevent billions in avoidable harm. Right-to-work checks can evolve from a static compliance requirement into a robust abuse prevention mechanism.

While governments set the foundations through policy, frameworks, and support systems, employers must bring these principles to life each day. Real safety depends on collective action, and every individual, organisation, and leader has a role to play.

8. The Pathway to Reform

The Five Ideas on the pathway to reform are outlined below.

Policy Idea	Focus	Purpose and Reform Outcome
1. National Mutual Recognition	Harmonise credential recognition, clearance standards, and enforcement across all jurisdictions.	Eliminates duplication and confusion; ensures that a suspension or ban in one jurisdiction applies nationally.
2. 360 Degree Continuous Verification	Establish real-time, automated linkage between employer systems and government registers (not just government-to-government systems)	Enables live monitoring and rapid response from employers to revoked or expired credentials, reducing time-lag risk.
3. Technology Accreditation	Certify secure, API-enabled technology partners capable of linking directly to government systems.	Builds a trusted digital infrastructure for safeguarding, ensuring data integrity, privacy, and interoperability, without the need to build new registers.
4. Transition Support	Provide grants and capacity-building for small and regional employers to adopt modern verification tools.	Ensures equity of access to compliance systems, lifting baseline safety standards nationwide.
5. Culture of Prevention	Embed safeguarding accountability from boardroom via transparent reporting on liability, as well as to frontline, workforce compliance upskilling.	Shifts safeguarding from a reactive compliance task to a proactive, human-centred culture of care.

Government versus industry roles are illustrated across the five policy areas to demonstrate where and how the execution of incremental steps can make lasting progress.

Government

Industry

Phase 1 Ideas: Foundations & Pilots



- Mandate **employer linkage and quarterly verification** as a licence or funding condition across all registers.
- Pass “**banned in one state, banned in all states**” legislation in all jurisdictions”.
- Mutually recognise and map equivalence of **workforce clearance standards** across all states of Australia and all care work.
- Run pilots in high-risk sectors with **approved technology partners** to test secure, real-time integration and set standards for these partners going forward.

- **Link all worker records** to the relevant registers and commence quarterly re-verification.
- Join **government pilots and partner with approved technology** providers to validate methods for secure, continuous, and automated verification processes.

Phase 2 Ideas: Integration



- **Leverage common API** design for each register to enable real-time alerts.
- Provide **funding and transition support** to help smaller employers move from manual, likely once off to automated, continuous verification.
- Develop a **risk-based compliance model** that allows smaller providers to adopt simplified verification while larger employers implement continuous monitoring.

- Move to **continuous monitoring** across all roles in scope.
- **Integrate** verification with HR and rostering systems via government approved integration partners.
- Apply **risk-based compliance** methods in line with the organisation's size and service scope. Provide regular compliance reporting to boards, funders, and regulators.

Phase 3 Ideas: Consolidation



- Retain ownership of registers while **partnering with technology providers** to formalise two-way integrations with employers.
- The integrations provide insights for verified **risk and quality intelligence**, underpinned by informed consent and legal frameworks on data sharing.
- Such verified workforce risk and quality data prompts **reportable conduct and investigations** before they become critical incidents.

- Treat continuous verification as a core governance and **risk prevention responsibility**.
- Maintain **live workforce visibility** and partner with accredited providers to enhance analytics, reporting, and client safety.
- Demonstrate a **proactive safeguarding posture** (not just compliance) easily through independent audits aligned with national standards.

9. Technology Environment Required

Implementing the above recommendations will require consistent national application of fit-for-purpose technology that meets the following criteria:

- **Integration and automation:** Employer or trusted third party industry systems must be linked directly with government registers in real time, generate automatic alerts for any credential changes, and maintain complete audit trails while adhering to relevant data retention and disposal laws and policies, for all verification activities. This allows employers to decide daily if people are suitable to work.
- **Scalability and adaptability:** Technology must be flexible and affordable for employers of all sizes, from sole traders to large enterprises, to ensure consistent safeguarding across all sectors.
- **Security and privacy:** Solutions must apply end-to-end encryption, access controls, and regular security testing, with privacy principles embedded throughout.

10. Preliminary Cost Avoidance of Fixing Safeguarding System Failures

“The cost of fixing the problem is **minuscule** compared to the cost of inaction³⁵.”

Australia has both the tools and the evidence to act now. Strengthening right-to-work verification through continuous monitoring, automation, and shared accountability will deliver immediate and measurable benefits to employers, regulators, and the wider community.

For Employers: Immediate Actions

- **Implement Continuous Monitoring:** The cost of inaction – for continuing with manual checks or checks only at recruitment is approximately \$937 per employee. That cost is based on one manual admin role, one fine and one legal claim for every 1000 workers. In stark contrast, implementing continuous monitoring is an estimated cost of approximately \$20 per employee annually, providing a combined financial and social return of approximately 46 times that small \$20K investment.
- **Demonstrate Compliance Quarterly:** With penalties for “knowingly or recklessly” employing unsuitable workers, maintaining comprehensive verification records is not optional — it is essential legal protection and a mark of good governance.

For Policymakers: Collaborative Reform

Investing in secure, accredited technology platforms and data-sharing infrastructure offers transformative potential. Using API connections and the existing Standard Business Reporting (SBR) framework, continuous verification for all 3.5 million care-sector workers would cost around \$70 million annually, compared to an estimated **\$2.4 billion annual cost of safeguarding failures**³⁶.

³⁵ Liv Whitty, Oho CEO

³⁶ \$70m cost calculation: Oho data on the average continuous verification cost of \$20 per year per worker multiplied by 3.5 million care workers, and aggregated national data on safeguarding failure impacts, assuming the average cost of a care worker is \$80,000 per year.

Return on investment: Funding back into the sector

This shift would not only prevent harm but also free up resources to:

- Fund up to 25,000 additional care workers³⁷,
- Improve workforce stability and quality, and
- Drive innovation across the care and education sectors.

The Investment Case

A \$70 million solution to a \$2.4 billion problem. Every dollar invested in prevention saves hundreds more in crisis response. Automated verification replaces reactive compliance with proactive protection, improving staff confidence, family trust, and community reputation.

‘For every week of **delay, Australia bears \$8 million in preventable cost, and every missed credential represents a person left at risk’³⁸**

By acting decisively, Australia can transform a \$2.4 billion challenge into a \$70 million solution and lead the world in safeguarding excellence.

Expected outcomes

Implementation of these five policy ideas would:

- Deliver **nationally consistent safeguarding standards** across all regulated sectors.
- Achieve approximately **>95% credential linkage**, ensuring live workforce visibility and rapid response to revocations³⁹.
- Reduce administrative costs by **up to 40%**⁴⁰ for employers through automation and streamlined reporting.
- Generate **up to \$1.7 billion in annual national savings**⁴¹ through prevention, efficiency, and avoided harm.
- Rebuild **public trust** by transforming right-to-work verification from a compliance obligation into a cornerstone of community protection.

³⁷ As above footnote 36. Derived reinvestment equivalent based on estimated national savings.

³⁸ Author’s analysis based on Oho internal modelling and aggregated national data. Weekly estimate derived from annual safeguarding failure cost of \$2.4 billion.

³⁹ Automated linkage to government registers achieved through item 2 of the five ideas pathway to reform.

⁴⁰ Oho, 2025. Submission to Treasury Consultation: National Approach to Worker Screening in the Care and Support Economy.

⁴¹ Section 6: Economic Case for Reform and Section 9 – calculates the estimated cost of inaction (2.4bn) minus the cost to fix (70m).

Conclusion: The actionable route to national safeguarding system excellence

With 6 million workers, supporting over **12.4 million vulnerable Australians**⁴² safeguarding is not a niche compliance issue; it is central to national wellbeing. The technology exists, the policy foundations are in place, and the data is clear.

Fragmented verification processes, inconsistent state standards, and rising compliance costs have created a landscape where **both vulnerable people and employers remain exposed**.

At the same time, technological capability, regulatory reform, and political will are aligning to make comprehensive safeguarding reform not only possible but essential.

The **Safeguarding Systems Framework** is a practical, evidence-based blueprint to build a connected, modern safeguarding ecosystem that protects people, reduces administrative burden, and delivers measurable national benefit. It is structured around five ideas for safeguarding reform, each addressing a critical component of the current system.



- **Financial:** Current system failures cost between \$2.4 billion annually in preventable harm and inefficiency⁴³.
- **Operational:** Manual verification processes are slow, inconsistent, and prone to error, increasing risk for both providers and the public.
- **Ethical:** Every unverified credential represents a potential breach of trust and a preventable act of harm.
- **Technological:** Secure two-way data linking and integration capability now exists to enable national consistency and continuous protection of participants and employers from bad actors otherwise exploiting information gaps.

⁴² Australian Bureau of Statistics, 2022. Disability, Ageing and Carers, Australia: Summary of Findings. Canberra: ABS.
<https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>
Australian Institute of Health and Welfare, 2024. People using aged care services. Canberra: AIHW.
<https://www.aihw.gov.au/reports/aged-care/people-using-aged-care>

⁴³ Section 6: Economic Case for Reform

This paper provides a clear, actionable route to national safeguarding system excellence. By connecting data, accrediting technology, and embedding accountability, Australia can protect its most vulnerable citizens, support its workforce, and demonstrate global leadership.

The time for action is now.

Technology-led systems can rapidly strengthen verification processes, preventing predators from accessing vulnerable populations across early learning, disability services, aged care, community support, and sport.

The economic and human cost analysis in this paper underpins a clear path forward for the **National Framework for Safeguarding Systems**, a coordinated, technology-driven roadmap for reform.

Written & published by

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Background Information: Oho

Oho is a compliance automation and safeguarding platform, purpose-built to protect vulnerable Australians through automated, ongoing screening of workers and volunteers across the employee lifecycle.

Oho was born out of the Royal Commission into Institutional Responses to Child Sexual Abuse after the founders witnessed testimonies while attending the Commission an impacted friend. The founders built a product to create safer environments for Australia's vulnerable people, commencing in 2021.

Mission: **"Oho protects vulnerable people and organisations from abuse and its impacts".**

Oho's credibility: Oho serves over 140 employers (small and large) across the care & community sector, verifying 224,000+ workers against 23+ government registers to provide near real-time status updates to employers, enabling them to act and intervene to safeguard their people. Oho protects over 4.2 million vulnerable Australians.

Oho Safeguarding Verification Impact (2021 - 2025)

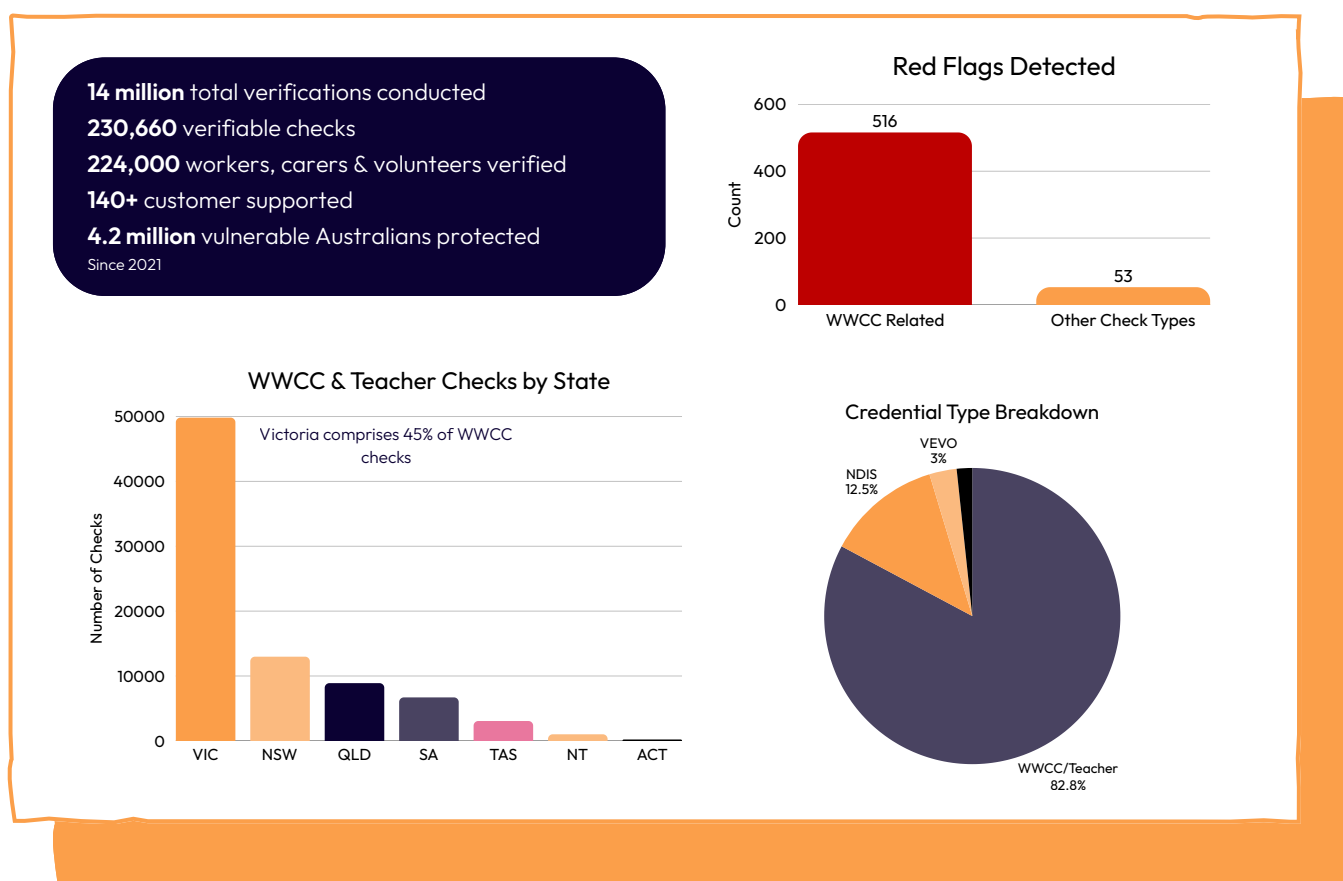


Figure: Data Visualisation of Oho anonymised data

By the numbers

- Oho has conducted over **14 million verifications** since 2021
- Oho supports **140** customers with right-to-work screening
- Oho verifies over **224,000** workers, carers & volunteers
- Oho protects over **4.2 million** vulnerable Australians
- Oho has detected **569** red flags
- Oho now detects an average of **7** red flags a week

Over the past four years, Oho has connected with, worked alongside, and **supported hundreds of employers to strengthen workforce safeguarding** across the sectors serving vulnerable Australians. Through these partnerships, Oho has developed a deep understanding of safeguarding across the sector, from policy to processes, technology frameworks, the admin costs and challenges, and the limitations of existing systems.

Oho has also witnessed and supported the dedicated employers raising the bar on safeguarding and investing resources into their people, while grappling with the administrative burden and cost pressures.

This experience has reinforced a critical insight: **while no solution is perfect, Australia's current right-to-work and credential verification systems fall short** of the safeguarding standards that vulnerable populations deserve.

Recent media coverage of alleged sexual abuse of children in the Australian childcare industry have sent shockwaves through the country and forced Governments to act.

Together we must unite to protect our children & vulnerable people.

Oho is here to support that mission.



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