

29 May 2026

Consultation Team
Modernising and Harmonising Classification Standards
Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts
reform@classification.gov.au

Dear Sir/Madam,

RE: Consultation – Update to Modernise and Harmonise the Classification Guidelines 2025

The Local Government Association of Queensland (LGAQ) welcomes the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (Department) on the review of the Update to Modernise and Harmonise the Classification Guidelines 2025.

The LGAQ is the peak body for the 77 local governments in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities.

The LGAQ understands the purpose of the review is to update and harmonise Australia's classification guidelines to ensure that the classification framework used by the Australian Classification Board (the Board), is fit for purpose now and into the future.

Importantly, the National Classification Scheme (the Scheme) is an agreement between the Federal, State and Territory governments, with the Board responsible for making classification decisions and providing advice about the content of films, computer games and certain publications to help Australians make informed choices about what they and their families watch, play and read.

The Board gauges consumer standards and behaviour and monitors the effectiveness of the Scheme, giving effect to the following principles:

- adults should be able to read, hear, see and play what they want
- minors should be protected from material likely to harm or disturb them
- everyone should be protected from unsolicited material they find offensive
- the need to take account of community concerns about violence, sexual violence and the portrayal of persons in a demeaning manner.

As the closest level of government to the community, local governments are acutely aware of the impact of the Scheme. In particular, the classification of book publications of considerable interest recognising that all 77 Queensland councils operate public library services, either as Independent Libraries, through Rural Libraries Queensland, or via Indigenous Knowledge Centres.

Unlike films and computer games that must go through a process of classification, only a relatively small percentage of book publications have been assessed by the Board.

As a result, it is possible that there are publications in local government libraries that, if assessed by the Board, could have restrictions applied. When a book is (or is not) classified by the Board, it is the council library staff on the frontline of the community response.

In preparing this submission, the LGAQ has considered the LGAQ Policy Statement (**Attachment 1**), previous LGAQ Annual Conference resolutions (**Attachment 2**) and direct feedback from Queensland councils regarding the Scheme.

Specifically, Queensland councils have identified the following key considerations that should be considered as part of the current review of the Update to Modernise and Harmonise the Classification Guidelines 2025:

- The review recognises that misunderstanding and inconsistent interpretation of classification outcomes undermines trust in the Scheme and creates unnecessary conflict. However, libraries are not explicitly addressed, despite being a primary public interface for books and publications.
- Public libraries are committed to principles of freedom of expression and free access to information, with collections developed to reflect the educational and recreational interests of the whole community.
- Libraries typically contain tens of thousands of publications and access to vast online resources. Audio book versions of printed content are not classified under current classification arrangement.
- While library staff embrace their duty of care to protect visitors accessing certain content, libraries are not resourced, nor librarians trained, to censor content.
- Many councils have experienced challenges related to the classification of books and other resources within public libraries, including community complaints or concerns, digital or online book access issues, impacts on children's or young adult collections, requests for removal or restriction of books, and staff safety or wellbeing concerns.
- Public library staff may be subjected to unreasonable harassment and organised campaigns for the censoring of content within existing collections even when a book is not classified as restricted - for example, those who deem certain publications offensive and inappropriate may place pressure on councils and frontline staff in libraries to remove books from libraries.
- Such interactions can place council staff at risk of physical and psychological harm and tie up local government resources responding to community requests to censor content.
- In making decisions to remove certain content, councils can also risk funding from the State Library of Queensland as well as face challenges under *Anti-Discrimination Act 1991* (Qld) and the *Human Rights Act 2019* (Qld).
- Psychosocial work health and safety laws are nationally modelled, but for Queensland local governments they are enforced under the following legislation *Work Health and Safety Act 2011* (Qld), *Work Health and Safety Regulation 2011* (Qld) and the *Managing the risk of psychosocial hazards at work – Code of Practice 2022* (Qld). If a psychological hazard in a library is foreseeable, councils are legally required to manage it and ensure their staff are safe from such hazards.
- As the level of government that receives the least funding – earning around three cents in every dollar of taxation revenue compared to 80 cents for the Federal Government and almost 17 cents for the State – councils cannot continue to shoulder additional responsibilities and absorb additional and increasing costs. This is an important ask, as research undertaken in 2024 as part of the LGAQ's *Cost Shifting Report*¹, reveals that Queensland councils are stepping in to provide extra services, outside of their core business, to ensure communities remain liveable.
- In addition, the latest Queensland Audit Office² report into local government financial sustainability, found that Queensland councils continue to remain heavily reliant on Federal and State government grants to deliver essential services for their communities.
- There is a critical need for guidance, tools and training to equip library staff with the knowledge, skills, and confidence to address the issues caused by the Scheme and continue to uphold their legal obligations under the national psychosocial work health and safety model. This includes the need for template responses and talking points libraries can use when responding to public challenges that reference classification decisions; and clear escalation or referral pathway for libraries when classification concerns are raised.

Overall, the Scheme plays a significant role in shaping the delivery and quality of community inclusion services but there is a need for greater community education and awareness of the roles and responsibilities of the Board in the classification of publications, transparency in how classification

¹ [LGAQ Cost Shifting Report \(2024\)](#)

² [Local government 2024 | Queensland Audit Office](#)

decisions are made and consistent messaging and escalation pathways to support confidence in the system.

Importantly, reforms to modernise Australia's classification arrangements should look to ensure community members concerned about the appropriateness of a particular publication can apply to the Board for that publication to be assessed.

In addition, councils need to be supported through efficient and effective processes to develop, manage and deliver public library collections that comply with classifications, respond to public challenges that reference classification decisions, manage psychosocial work health and safety laws, and refer community requests for censoring of content to the Board.

Based on the above, the LGAQ makes three recommendations for consideration as part of the review:

- **Recommendation 1:** The LGAQ recommends the Federal Government enhances and modernises classification systems and processes, including establishment of an education campaign to:
 - provide the opportunity for community members concerned about the appropriateness of a particular publication, to apply to the Board for that publication to be assessed, and
 - support local governments to develop and deliver public library collections that comply with classifications.
- **Recommendation 2:** The LGAQ recommends the Federal Government develops national guidance material explaining how the Australian Classification Board decisions are intended to operate in a public library context, including clarification that:
 - classification ratings inform consumer choice but do not themselves determine library access decisions; and
 - responsibility for defending classification outcomes does not rest with individual libraries or library staff.
- **Recommendation 3:** The LGAQ recommends the Federal Government, in partnership with State and Territory governments, develops guidance material and provides tools and training to equip library staff with the knowledge, skills, and confidence to address the issues caused by the Scheme and supports councils to continue to uphold their legal obligations under the national psychosocial work health and safety model.

In line with the scope of the review, these recommendations will support public use and understanding of the classification system by improving how individuals can interact with the system, while also reducing the administrative and emotional burden on library workers and supporting a safe workplace for local government staff free from harassment.

Thank you for your consideration of this submission. The LGAQ looks forward to any further opportunities to assist with the modernising and harmonising of the classification standards.

Please do not hesitate to contact Crystal Baker, Manager – Strategic Policy via [REDACTED] or Jo Dawson, Lead – Community Development Policy and Projects via [REDACTED] or phone 1300 542 700 should you wish to discuss any aspect of this submission.

Yours sincerely,



Alison Smith
CHIEF EXECUTIVE OFFICER

Attachment 1: LGAQ Policy Statement

The LGAQ Policy Statement³ is a definitive statement of the collective voice of local government in Queensland and provides key policy positions of local government. The relevant agreed policy positions of local government that are relevant to the review of Australia's classification guidelines, are as follows:

7.2 Arts and Culture

7.2.1 Delivering Local Arts and Cultural Outcomes

- *7.2.1.1 Local government recognises that arts and culture contribute to the identity, wellbeing and resilience of local communities. Local government uses local and regional planning frameworks to identify and address local arts and cultural needs and aspirations, and achieve broader social, economic and environmental outcomes. Local government develops, funds and supports local institutions such as libraries, galleries, museums, visitor information services and performing arts venues and, as such, has an important role in the development, renewal and maintenance of cultural infrastructure.*

7.3 Library Services

7.3.1 Partnerships

- *7.3.1.1 Local government recognises libraries as areas of opportunity within the community to deliver lifelong learning, social capital, and foster strategies for learning communities. Local government recognises the value of cooperative joint ventures between local, State and Federal Government departments and agencies in delivering quality library services.*
- *7.3.1.2 Local government will work in partnership with the State Government to deliver equitable and quality library services.*
- *7.3.1.3 Local government will continue to lobby the State Government for additional library resources and improved library services.*
- *7.3.1.4 State Government subsidies for library services should be regularly reviewed and increased where necessary to a level sufficient to allow local governments to meet the growing needs of library services, including technological advances. Additional State funding will not be used by local governments to reduce their financial commitment to library services.*
- *7.3.1.5 Local government supports the establishment and maintenance of Indigenous Knowledge Centres in discrete and remote First Nations communities as hubs for library, cultural and social services within the communities.*

³ [2025 LGAQ Policy Statement](#)

Attachment 2: LGAQ Annual Conference Resolutions

The following resolution was passed by Queensland councils at the 2024 LGAQ Annual Conference relating to the Australian Classification Board:

- **Resolution 113: Australian Classification Board process** - That the LGAQ calls on the Australian Classification Board to urgently review and enhance and modernise systems and processes including an education campaign:
 - So that community members can engage with the classification processes where they have concerns about particular publications and
 - To support local governments to develop and deliver public library collections that comply with classifications.