

	COUNCIL POLICY	
	Reportable Conduct	
	Policy Number	CP103
	Directorate	Organisational Services and Transformation
	Owner	People, Safety and Wellbeing
	Last Approved	26 August 2026
	Review Due	26 August 2030

1. PURPOSE

The purpose of this Reportable Conduct Policy (the **Policy**) is to establish the clear processes for preventing, identifying, reporting, investigating and responding to reportable allegations involving workers engaged by the Fraser Coast Regional Council (the **Council**).

This Policy aims to ensure that all concerns regarding the conduct of workers towards children are managed promptly, fairly, consistently and in accordance with the *Child Safe Organisations Act 2024* and other relevant legislative requirements. Through the implementation of this Policy, the Council seeks to foster a culture of accountability, transparency and continuous improvement in child safety practices.

2. SCOPE

This policy applies to all workers of Council which includes employees, councillors, trainees, apprentices, volunteers, contractors, consultants, labour-hire workers, students, third-party partners, and other persons engaged by, representing, or acting on behalf of the Council.

3. HEAD OF POWER

This Policy is established under the authority of the *Child Safe Organisations Act 2024* (the **Act**). The Act requires the head of a reporting entity to ensure appropriate systems are in place to prevent reportable conduct by workers, enable reportable allegations or reportable convictions involving workers to be notified to the head of the entity, enable reportable allegations or reportable convictions involving the head of the entity to be notified to the Queensland Family and Child Commission, and support the investigation of, and response to, reportable allegations or reportable convictions relating to workers.

This Policy forms part of the broader Child Safe Framework of the Council and should be read in conjunction with the Child Safety and Wellbeing Policy and any other child safety related policies adopted by the Council. Where there is any inconsistency between this Policy and another policy the interpretation that best promotes and protects the safety and wellbeing of children will prevail, subject to any legislative requirements.

4. POLICY STATEMENT

Council is committed to safeguarding the safety, wellbeing and rights of all children in all aspects of its operations. This commitment is reflected in the organisational values, policies and practices, and is reinforced through a zero-tolerance approach to child abuse, harm, and reportable conduct.

4.1. Reportable Conduct

Reportable conduct means certain serious conduct by a worker towards, in relation to, or in the presence of a child that may pose a risk to a child's safety, wellbeing or welfare. Under the Act, reportable conduct includes:

- a child sexual offence;
- sexual misconduct committed in relation to, or in the presence of, a child;
- ill-treatment of a child;
- significant neglect of a child;
- physical violence committed in relation to, or in the presence of, a child; and
- behaviour that causes significant emotional or psychological harm to a child.

Reportable conduct may consist of a single act or a series of acts and may occur while a worker is performing work for the Council or in their private capacity where there is a relevant connection to their role or where the conduct may present a risk to children participating in, accessing or receiving Council services, programs, activities or facilities.

Reportable conduct may include allegations or convictions relating to conduct that occurred before 1 July 2026 where the matter is first brought to the Council's attention on or after that date and the person concerned remains a worker of the Council.

Reportable conduct may also include allegations or convictions relating to former workers where the conduct occurred during a period in which the individual was engaged by, representing, or acting on behalf of the Council.

Conduct that is **not** considered reportable include:

- reasonable behaviour management consistent with the Council's Code of Conduct;
- accidents or incidents where no neglect or recklessness is involved;
- trivial incidents with no risk of significant harm; and
- reasonable management or care of a child in considerations of their characteristics, particularly in circumstances where the child may have a disability or high-needs and be subject to restrictive practices or positive behaviour support.

4.2. Responsibilities of the Chief Executive Officer

The Chief Executive Officer (CEO) of the Council is responsible for ensuring the Council's compliance with the Reportable Conduct Scheme and the Act.

The CEO's responsibilities under this Policy extend to:

- a) implementing and maintaining systems, policies and procedures that promote child-safe practices and prevent reportable conduct;
- b) ensuring there are accessible and effective processes for reporting concerns, allegations and complaints relating to reportable conduct;
- c) ensuring reportable allegations and reportable convictions are appropriately assessed, managed and investigated:

- d) notifying the Commission of reportable allegations and reportable convictions within the required statutory timeframes;
- e) providing interim and final reports to the Commission as required under the Act; and
- f) ensuring compliance with any other applicable reporting, notification and information-sharing obligations.

The CEO may delegate functions under this Policy but remains accountable for the Council's compliance with the Reportable Conduct Scheme.

4.3. Prevention of Reportable Conduct

Council is committed to preventing reportable conduct and creating a child-safe environment in which children are respected, protected, and supported. Preventing reportable conduct is a shared responsibility and is achieved through effective governance, child-safe practices, workforce screening, education and training, risk management, and a culture that promotes the safety and wellbeing of children.

To support the prevention of reportable conduct, the Council:

- a) implements and maintains child-safe policies, procedures and practices that promote the safety and wellbeing of children and support compliance with the Act. The Council's child-safe framework includes, but is not limited to:
 - i. Statement of Commitment to Child Safety;
 - ii. Child Safety and Wellbeing Policy;
 - iii. Code of Conduct;
 - iv. Complaints Management Policy;
 - v. this Reportable Conduct Policy; and
 - vi. Reportable Conduct Incident Handling Organisational Procedure.
- b) undertakes appropriate recruitment, screening and selection processes to ensure that all workers engaged by, representing, or acting on behalf of the Council are suitable for their roles, including undertaking relevant pre-employment checks and, where required, compliance with applicable Blue Card and other legislative requirements;
- c) provides workers with on-going training, education and guidance regarding their child safety obligations, expected standards of conduct, and responsibilities under this Policy and related legislations;
- d) promotes a culture in which concerns relating to child safety are identified, reported and addressed promptly and appropriately;
- e) identifies, assesses and manages risks to the safety and wellbeing of children arising from Council services, programs, activities and facilities; and
- f) monitors and reviews its child-safe practices to ensure their ongoing effectiveness.

All workers are expected to comply with the Council's child safety policies, procedures and requirements applicable to their role.

4.4. Notifications of Reportable Allegations or Reportable Convictions

Council is committed to maintaining clear, accessible and well-communicated processes for reporting concerns, complaints and allegations relating to child safety and reportable conduct.

All workers have a responsibility to report any allegation, concern, suspicion, disclosure or information that may constitute reportable conduct. This includes circumstances where there is uncertainty as to whether the conduct meets the threshold for reportable conduct. Workers are not required to assess or determine whether conduct constitutes reportable conduct before making a report.

Reports must be made as soon as practicable after a worker becomes aware of the matter.

Workers may report concerns directly to the CEO or a delegated officer in the HR team through any of Council's approved reporting channels, including the completion of a Beakon incident report or a Reportable Conduct Incident Notification Form (eDOCS #5425645).

Workers do not require approval or direction from a manager or another person before making a report.

Where a reportable allegation or reportable conviction involves the CEO or another senior officer with delegated authority, reports may be made directly to another senior officer who is not subject to the authority of the person who is the subject of the allegation, or externally to the Commission where appropriate. These alternative reporting arrangements are intended to ensure that concerns can be raised without fear of reprisal and that allegations involving senior leadership are managed impartially and appropriately.

Council will clearly communicate these alternative reporting options to all workers and ensure that reporting processes maintain confidentiality, protect reporters from detriment, and prioritise the safety and wellbeing of children and young people.

Council provides multiple channels for community members to raise a concern:

- **Email:** By emailing enquiry@frasercoast.qld.gov.au
- **In Writing:** Address correspondence to PO Box 1943, Hervey Bay QLD 4655.
- **By Telephone:** Contact Council's call centre on 1300 79 49 29
- **In Person:** Visit a Council customer service centre
- **Assistance Services:**
 - Language support via the National Translating and Interpreting Service (NTIS) on 131 450
 - Hearing or speech assistance via the National Relay Service on 133 677

4.5. Reporting requirements to the Commission

The CEO, is responsible for ensuring all statutory notifications and reports are provided to within the required timeframes below:

Report type	Timeframe	Minimum information required
Initial notification	Within 3 business days of becoming aware of a reportable allegation or reportable conviction	1. Details of the reportable allegation or reportable conviction; 2. Identity of the worker (including any known aliases and date of birth, if available); 3. Name of the CEO; 4. Confirmation of any notifications to the Queensland Police Service (QPS) or relevant regulator; 5. Council's contact details; 6. Details of any immediate risk management actions taken; and 7. Any other information required by regulation.
Investigation notification	As soon as practicable after an investigator is appointed	1. Notification that an investigation has commenced; and 2. Contact details of the nominated investigator or designated contact person responsible for liaison with the Commission.
Interim report	Within 30 business days of the initial notification	1. An update on the facts and circumstances of the matter (to the extent known at the time); 2. Details of actions taken, including risk management actions; and 3. Copies or summaries of any written submissions provided by the worker (if applicable).
Final report	As soon as practicable following completion of the investigation	1. Details of the facts and circumstances of the matter; 2. Findings of the investigation and reasons for those findings; 3. Copies of relevant material relied upon; 4. Details of any referrals to other agencies; 5. Details of risk management actions taken or proposed; and 6. Any identified improvements to strengthen the Council's child safety, reporting, or investigative processes.
Additional information	As requested by the Commission	Any further information reasonably required by the Commission in relation to the findings of the investigation or the Council's response to those findings.

4.6. Confidentiality

All information relating to a reportable conduct matter must be treated as strictly confidential and disclosed only where necessary and authorised by law. Upon becoming aware of a reportable allegation or conviction, a worker must immediately notify the HR team and/or the Commission and must not discuss the matter with any other person unless expressly directed or authorised to do so.

Information will be shared strictly on a need-to-know basis and only with those involved in the assessment, investigation, or reporting of the matter. This is to protect the integrity of the process, ensure procedural fairness, and manage risk to children and others involved.

The Council will prioritise the safety and wellbeing of children and young people and may disclose information where necessary to prevent harm or manage risk. However, information will not be shared where it may compromise the investigation, place any person at risk, or otherwise prejudice the process.

The identity of the notifier will not be disclosed unless required or permitted by law. All records and information must be stored securely, with access limited to the CEO, the nominated investigator, or other authorised personnel. Information may be shared with the Commission, the QPS, or other relevant regulatory or law enforcement bodies where required.

Any breach of confidentiality may result in disciplinary action, up to and including termination of employment, and may also attract legal consequences.

5. DEFINITIONS

To assist in the interpretation of this Policy, the following definitions apply:

“Children” or **“Child”** means all individuals under 18 years of age.

“Commission” means the Queensland Family and Child Commission.

“Council” means the Fraser Coast Regional Council.

“Reasonable belief” means a belief that a reasonable person would form based on available information, facts or observations, even if all details are not known and evidence has not yet been tested. It is more than a suspicion or concern but does not require proof or certainty.

“Reportable allegations” means allegations or other information that leads a person to form a reasonable belief that a worker has committed reportable conduct or engaged in misconduct that may involve reportable conduct.

“Reportable conduct” as defined within section 4.1 of this Policy.

“Reportable convictions” means convictions for an offence against a law of any state/territory within the Commonwealth of Australia that may involve reportable conduct.

“Worker” means any employee, councillor, contractor, consultant, volunteer, person undertaking work experience, trainee, or other person engaged by, representing, or acting on behalf of the Council.

6. ASSOCIATED DOCUMENTS

- *Child Safe Organisations Act 2024* (Qld)
- *Child Protection Act 1999* (Qld)
- *Criminal Code Act 1899* (Section 229BC)
- *Working with Children (Risk Management and Screening) Act 2000*
- Australian Human Rights Commission Guidelines
- National Principles for Child Safe Organisations
- Queensland Family and Child Commission (QFCC) Guidelines and Resources
- Fraser Coast Regional Council Statement of Commitment to Child Safety
- CP007 Complaints Management Council Policy (eDOCS #2991974)

- CP098 Child Safety and Wellbeing Council Policy (eDOCS #5268093)
- MP023 Code of Conduct Management Policy (eDOCS #1969232)
- MP043 Pre-Employment and Internal Employment Screening Management Policy (eDOCS #4244453)
- Reportable Conduct Incident Handling Organisational Procedure (eDOCS #5423222)
- Reportable Conduct Scheme Policy Forms and Templates (eDOCS #5423225)
- Reportable Conduct Incident Notification Form (eDOCS #5425645)

7. REVIEW

This Policy will be reviewed on a risk-based methodology and will be reviewed at least every four years.

Version Control

Version Number	Key Changes	Approval Authority	Approval Date	Document Number
1	New Policy	Council OM 08/26	26 August 2026	5423038