

Reporting Concerns of Harm and Abuse Policy

Purpose:	The purpose of this policy is to provide written processes about – (a) how the school will respond to harm, or allegations of harm, to students under 18 years; and (b) the appropriate conduct of the school's staff and students to comply with the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) section 16..	
Scope:	Students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at The School of Total Education and covers information about the reporting of harm and abuse.	
Status:	APPROVED	Supersedes: Initial Use
Authorised by:	School Governing Body Chairperson	Date of Authorisation: 15/7/2026
References:	• Child Protection Act 1999 (Qld) • Child Safe Organisations Act 2024 (Qld) • QFCC - Reportable Conduct Scheme • Child Protection Regulation 2023 • Education (Queensland College of Teachers) Act 2005 • Work Health and Safety Act 2011 • Education (General Provisions) Act 2006 (Qld) • Education (General Provisions) Regulation 2017 (Qld) • Education (Accreditation of Non-State Schools) Act 2017 (Qld) • Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) • Working with Children Check Act (2000) • Working with Children (Risk Management and Screening) Regulation 2020 (Qld) • Criminal Code Act 1899 (sections 229BB and 229BC) • The School of Total Education Complaints Handling Policy & Procedure • The School of Total Education Work Health and Safety Policy • The School of Total Education Student Safety and Wellbeing Policy	
Review Date:	Annually or as appropriate, to reflect changing legislation and environment.	Next Review Date: 12 months from authorisation
Policy Owner:	School Governing Body	

Definitions

- **Section 9 of the *Child Protection Act 1999* - “Harm”**, to a child, is any detrimental effect of a significant nature on the child’s physical, psychological or emotional wellbeing.
 1. It is immaterial how the harm is caused.
 2. Harm can be caused by—
 - a) physical, psychological or emotional abuse or neglect; or
 - b) sexual abuse or exploitation.
 3. Harm can be caused by—
 - a) a single act, omission or circumstance
 - b) a series or combination of acts, omissions or circumstances.
- **Section 10 of the *Child Protection Act 1999* - A “child in need of protection”** is a child who—
 - a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm
 - b) does not have a parent able and willing to protect the child from the harm.
- **Section 364 of the *Education (General Provisions) Act 2006* - “Sexual abuse”**, in relation to a relevant person, includes sexual behaviour involving the relevant person and another person, regardless of age or gender, in the following circumstances –
 - (a) the other person bribes, coerces, exploits, threatens or is violent toward the relevant person
 - (b) the relevant person has less power than the other person
 - (c) there is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.
- **Staff** – in this policy, refers to full-time, part-time, permanent, fixed term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.

Health and Safety

The School of Total Education has written processes in place to enable it to comply with the requirements of the *Child Safe Organisations Act 2024 (Qld)*, the *Work Health and Safety Act 2011 (Qld)* and the *Working with Children Check Act 2000 (Qld)*.

Conduct of all Staff and Students

All staff will ensure that their behaviour towards, and relationships with students, reflect proper standards of care for students. Staff, contractors and volunteers must not cause harm to student

Reporting Inappropriate Behaviour

If a student considers the behaviour of a staff member to be inappropriate, the student should report the behaviour to: -

- Mr Nigel Sullivan, the Principal; or
- The student’s grade or home group teacher

Dealing with Report of Inappropriate Behaviour

A staff member who receives a report of inappropriate behaviour must report it to the principal. Where the principal is the subject of the report of inappropriate behaviour, the staff member must inform a member of the school's governing body. Reports will be dealt with under the school's Complaints Handling Policy.

Reportable Conduct Scheme Obligations

The school will comply with its obligations under the Child Safe Organisations Act 2024 (Qld) by ensuring that reportable allegations and reportable convictions involving workers are reported internally as soon as practicable, notified to the Queensland Family and Child Commission within required statutory timeframes, and appropriately investigated and reported as required under the Act.

An initial report under this section must include the following particulars:

- a) details of the reportable allegation or reportable conviction;
- b) the name, including any former name or alias, of the worker the subject of the reportable allegation or reportable conviction;
- c) the date of birth of the worker, if known;
- d) the name of the head of the reporting entity;
- e) whether the sector regulator for the reporting entity or the police service has been contacted about the reportable allegation or reportable conviction;
- f) the reporting entity's contact details, including its name, address and telephone number;
- g) if the worker currently performs work for the reporting entity—any action, including risk management action, taken in response to the reportable allegation or reportable conviction, including, for example—
 - i. immediate steps taken to prevent the worker from having contact with children; and
 - ii. any disciplinary action taken or proposed to be taken against the worker;
- h) any other matter prescribed by regulation

Queensland College of Teachers Obligations

The school will comply with its obligations under the Education (Queensland College of Teachers) Act 2005 (Qld) by notifying the Queensland College of Teachers as soon as practicable when the school begins dealing with an allegation of harm to a child involving a teacher, and again as soon as practicable once the school's dealings with the allegation are concluded.

A notice when the school begins dealing with an allegation of harm to a child involving a teacher must include the following particulars:

- a) the name of the employing authority and, if the name of the authority is different to the name of the prescribed school, the name of the prescribed school;
- b) the name of the relevant teacher;
- c) the day the employing authority started dealing with the allegation;
- d) the allegation, particulars of the allegation and any other relevant information;
- e) details about what actions the employing authority has taken to deal with the allegation

Reporting Sexual Abuse

Section 366 of the Education (General Provisions) Act 2006 states that if a staff member becomes aware, or reasonably suspects, in the course of their employment at the school, that any of the following has been sexually abused by another person:

- a) a student under 18 years attending the school;
- b) a kindergarten aged child registered in a kindergarten learning program at the school;
- c) a person with a disability who:
 - i. under section 420(2) of the Education (General Provisions) Act 2006 is being provided with special education at the school; and
 - ii. is not enrolled in the preparatory year at the school.

then the staff member must give a written report about the abuse or suspected abuse to the principal or to a director of the school's governing body immediately.

The school's principal or the director must immediately give a copy of the report to a police officer.

If the first person who becomes aware or reasonably suspects sexual abuse is the school principal, the principal must give a written report about the abuse, or suspected abuse to a police officer immediately and must also give a copy of the report to a director of the school's governing body immediately.

A report under this section must include the following particulars:

- a) the name of the person giving the report (the *first person*);
- b) the student's name and sex;
- c) details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been sexually abused by another person;
- d) details of the abuse or suspected abuse;
- e) any of the following information of which the first person is aware:
 - i. the student's age;
 - ii. the identity of the person who has abused, or is suspected to have abused, the student;
 - iii. the identity of anyone else who may have information about the abuse or suspected abuse

Reporting Likely Sexual Abuse

Section 366A of the *Education (General Provisions) Act 2006* states that if a staff member reasonably suspects in the course of their employment at the school, that any of the following is likely to be sexually abused by another person: -

- a) a student under 18 years attending the school;
- b) a kindergarten aged child registered in a kindergarten learning program at the school;
- c) a person with a disability who: -
 - i. under section 420(2) of the *Education (General Provisions) Act 2006* is being provided with special education at the school; and
 - ii. is not enrolled in the preparatory year at the school.

then the staff member must give a written report about the suspicion to the principal or to a board member of the school's governing body immediately.

The school's principal or the chairperson must immediately give a copy of the report to a police officer.

If the first person who reasonably suspects likely sexual abuse is the school's principal, the principal must give a written report about the suspicion to a police officer immediately and must also give a copy of the report to a board member of the school's governing body immediately.

A report under this section must include the following particulars: -

- a) the name of the person giving the report (the **first person**);
- b) the student's name and sex;
- c) details of the basis for the first person reasonably suspecting that the student is likely to be sexually abused by another person;
- d) any of the following information of which the first person is aware: -
 - i. the student's age;
 - ii. the identity of the person who is suspected to be likely to sexually abuse the student;
 - iii. the identity of anyone else who may have information about suspected likelihood of abuse

Responding to Harm

Harm caused by physical or sexual abuse

Under Section 13E (3) of the *Child Protection Act 1999*, if a doctor, a registered nurse, a teacher or an early education and care professional forms a 'reportable suspicion' about a child "in the course of their engagement in their profession", they must make a written report.

A **reportable suspicion** about a child is a reasonable suspicion that the child: -

- a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- b) may not have a parent able and willing to protect the child from the harm.

The doctor, nurse, teacher or early education and care professional must give a written report to the Chief Executive of the Department of Families, Seniors, Disability Services and Child Safety (or another

department administering the Child Protection Act 1999) The doctor, nurse, teacher or early education and care professional should give a copy of the report to the principal.

A report under this section must include the following particulars: -

- a) state the basis on which the person has formed the reportable suspicion;
- b) the child's name age and sex descriptor;
- c) details of how to contact the child;
- d) details of harm to which the reportable suspicion relates;
- e) particulars of the identity of the person suspected of causing the child to have suffered, suffer or be at risk of suffering, the harm to which the reportable suspicion relates;
- f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates¹.

During Business Hours assistance from a trained protection worker can be made through the Regional Intake Service – Toowoomba 1300 683 390. Outside of these hours, you can contact the Child Safety After Hours Service Centre on freecall 1800 177 135 (Queensland only)

Harm caused by psychological or emotional abuse or neglect

When the school receives any information alleging 'harm' to a student (other than harm arising from physical or sexual abuse) it will deal with the situation compassionately and fairly so as to minimise any likely harm to the extent it reasonably can, this may include reporting through the principal to Child Safety. If the harm is not at a level that is otherwise reportable to Child Safety, the matter should be referred to the principal, who may then refer the matter to Family and Child Connect.

Responsibilities under Criminal Code Act 1899 (Qld)

The *Criminal Code Act 1899* includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

Failure to Report

Under section 229BC of the Code, all adults must report sexual offences against a child by another adult to police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed. Failure to make a report, without a reasonable excuse, is a criminal offence. This offence applies to all adults inclusive of students 18 years or older, as well as parents/guardians and volunteers at the school. A reasonable excuse not to make under the *Criminal Code Act 1899* includes that a report has already been made under the *Education (General Provisions) Act 2006* (reporting sexual abuse or likely sexual abuse) and the *Child Protection Act 1999* (reporting significant harm or risk of significant harm) as per this policy

Failure to Protect

Under section 229BB of the Code, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

Awareness

The school will inform staff, students and parents of its processes relating to the health, safety and conduct of staff and students in communications to them and it will publish these processes on its website².

Accessibility of Processes

The school will inform staff, students and parents of its processes relating to the health, safety and conduct of staff and students in communications to them and it will publish these processes on its website and are available on request from the school administration

Training

The school will train its staff in processes relating to the health, safety and conduct of staff and students on their induction and will refresh training annually

Training is completed via ISQ Connect and Learn on an annual basis.

Implementing the Processes

The school will ensure it is implementing processes relating to the health, safety and conduct of staff and students by auditing compliance with the processes annually

Complaints Procedure

Suggestions of non-compliance with the school's processes may be submitted as complaints under The School of Total Education Complaints Policy.

Version	Date	Date / Changes Made	Changes made by	Approval Date
V1	2/7/2026	Initial Use	Letitia	15/07/2026

² Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(a)

Appendix 1

Summary of Reporting

Who	What abuse	Test	Report to	Legislation
All staff	Sexual	Awareness or suspicion Sexually abused or likely to be sexually abused	Principal or to a director of the governing body, through to police immediately	EGPA sections 366 and 366A
Principal if 'first person'	Sexual	Awareness or suspicion Sexually abused or likely to be sexually abused	A director of the governing body and police immediately	EGPA sections 366 and 366A
Teacher and registered nurse	Sexual and physical	Significant harm; and Parent may not be willing and able	Confer with principal, report to Child Safety	CPA sections 13E and 13G
All staff	Physical, psychological, emotional, neglect, exploitation	Significant harm, and Parent may not be willing and able	Principal, through to Child Safety	Accreditation Regulation section 16
All staff	Any	Not a level that is otherwise reportable to Child Safety	Family and Child Connect, may refer with consent or Principal, through to Family and Child Connect	CPA sections 13B and 159M
Principal	Any	Not a level that is otherwise reportable to Child Safety	Family and Child Connect, may refer without consent	CPA Sections 13B and 159M
Employing authority (Principal/Board)	Harm or likely harm due to the conduct of a teacher	When you start to deal with an allegation, and When you finish dealing with an allegation	Queensland College of Teachers	QCT sections 76 and 77
Any member of the public	Any	Significant harm, and Parent may not be willing and able	Child Safety	CPA section 13A
Any adult including students 18 years or older, parents/guardians and volunteers	A child sexual offence against a child by an adult	Gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed and (b) at the relevant time, the child is or was— (i) under 16 years; or (ii) a person with an impairment of the mind.	Police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed	Criminal Code section 229BC

Who	What abuse	Test	Report to	Legislation
All workers	Reportable allegation or reportable conviction by a worker	Reasonable belief that a worker has committed—reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity).	Head of Entity or their delegate, as soon as practicable. Where the allegations involve the Head of Entity, the notification must be made to the QFCC. May also go to a director of the governing body.	CSO Act section 33
Head of the Reporting Entity (Head of Entity) or their delegate	Reportable allegation or reportable conviction by a worker	Reasonable belief that a worker has committed—reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity).	QFCC initial notification within 3 business days. QFCC either interim or final report, within 30 business days.	CSO Act sections 34, and 30(1)(c)
Any person	Reportable allegation or reportable conviction by any worker	Reasonable belief that any worker has committed—reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity) or any other entity.	May report to QFCC at any time.	CSO Act section 33(4)

Appendix 2

Recognise it. Report it – Reporting to the QFCC

Recognise it. Report it.

How to report a concern to the Queensland Family and Child Commission

Under the Reportable Conduct Scheme, the head of an organisation is legally responsible for ensuring concerns about child abuse and harm are taken seriously, reported to the Queensland Family and Child Commission and investigated.

If you form a reasonable belief that reportable conduct may have occurred, act quickly.

When a reportable conduct concern is received, organisations are required to provide information to the Commission in line with the law. Failure to notify can result in a fine.

Types of reportable conduct

Child sexual offences

Sexual acts involving a child, grooming, or child exploitation material

Sexual misconduct

Showing a child sexual or age-inappropriate images or videos

Ill-treatment

Cruel, degrading or inappropriate treatment

Significant neglect

Serious failure to meet a child's basic needs, safety or wellbeing

Physical violence

Using or threatening physical force

Significant emotional or psychological harm

Behaving in a way that makes a child fear they will be harmed

Reporting obligations

The Reportable Conduct Scheme does not replace existing reporting obligations, you may also need to notify:

- the police, if the conduct may involve a criminal offence
- Blue Card Services
- other regulators, depending on your sector or profession.

It is the responsibility of the head of the organisation to meet all legal reporting obligations.

Before you report

Once you are aware of a concern, you must:

- assess any immediate risk to children and young people
- take action to protect safety and wellbeing
- consider whether police or another regulator also needs to be notified.



Within 3 business days

If you have formed a reasonable belief that reportable conduct has occurred, you must submit an initial notification to the Commission. It must include:

Details of the allegation or conviction

- what happened
- when and where it occurred
- what type of reportable conduct is involved
- when the organisation became aware.

Details of the worker

- name and date of birth (if known)
- role and contact with children
- whether they currently work for the organisation
- Blue Card details (if known).

Immediate risk management

- steps taken to protect children
- changes to duties, supervision or access
- any disciplinary or administrative action.

Within 30 business days

If the investigation is not complete within 30 business days, an interim report must be submitted to the Commission.

Interim reports should include:

- updated information about the allegation or conviction
- actions taken to assess and manage risk
- progress of the investigation
- any submissions from the worker.

The Commission may request further information, review investigation plans, and provide oversight and guidance.

After the investigation

A final report must be submitted as soon as practicable after the investigation is completed. It should clearly outline:

- how the investigation was conducted
- findings and reasons for those findings
- evidence relied upon
- risk management activities undertaken
- any disciplinary action
- actions taken to strengthen safeguarding practices.

The Commission may request additional information, provide advice or recommendations, commence its own investigation, or assess organisational compliance with the Child Safe Standards.

Finalising

Once the matter is finalised, you must:

- implement outcomes of the investigation
- review safeguarding practices
- strengthen policies or procedures where needed
- take steps to reduce future risks.

Learn more

For detailed guidance, reporting templates and practical resources, visit the Queensland Family and Child Commission's website:



 qfcc.qld.gov.au

 07 3900 6000