PROCEDURE
LEQ Reporting Reportable Conduct in Schools

Purpose:	The purpose of this Procedure is to ensure that any person, including Workers of a LEQ School, has a procedure to make a notification of a reportable allegation or reportable conviction.	
Level & Scope:	LEQ Schools	
Status:	v1.0	**Supersedes**: N/A - New
Authorised by:	LEQ Executive Director	**Date of Authorisation**: 8 June 2026

References:	• *Child Safe Organisations Act 2024* (Qld)
	• LEQ Child & Cultural Safety Statement of Commitment
	• LEQ Safeguarding Framework
	• LEQ Child & Student Safety & Wellbeing Policy
	• LEQ Child Protection - Reporting Concerns of Harm, Abuse and Reportable Conduct Policy
	  ○ LEQ Reporting Concerns of Harm and Abuse in Schools Procedure
	  ○ LEQ Reporting Reportable Conduct in Schools Procedure
	  ○ LEQ Reporting Concerns of Harm and Abuse in Services Procedure
	  ○ LEQ Reporting Reportable Conduct in Services Procedure
	• Staff as Parents Policy
	• LEQ Complaints Resolution Framework
	  ○ Enterprise Agreement Complaints Policy & Procedure
	  ○ Governance & Executive Complaints Policy & Procedure
	  ○ Community Complaints Policy & Procedure
	• Resources
	  ○ Queensland Family and Child Commission (**QFCC**) *Guide to Queensland's Reportable Conduct Scheme*
	  ○ Queensland College of Teachers Employing Authority Notifications about Teacher Conduct Policy	

Review:	Annually	**Next Review Date**: 8 June 2027
Distribution:	**Website:**	Required - Schools
	Staff:	Required – CLEQ, Secretariat, Councils and Schools.
	Parents:	Recommended – Parents' Portal
	Students:	Recommended – Student Portal

Definitions & Abbreviations

This procedure adopts the definitions and abbreviations under the Policy, and the additional definitions and abbreviations below.

Policy	The LEQ Child Protection – Reporting Concerns of Harm, Abuse and Reportable Conduct Policy.
you or **I**	A person, including Workers of St James Lutheran College, that wants to report a Reportable Allegation or Reportable Conviction.

How Can I Make a Report of a Reportable Allegation or Reportable Conviction?

For all persons

If you would like to report a:

- **Reportable Allegation –** an allegation or other information that leads you to form a reasonable belief that a Worker of St James Lutheran College has committed Reportable Conduct, or misconduct that may involve Reportable Conduct; or
- **Reportable Conviction –** a conviction for an offence committed by a Worker of St James Lutheran College against a law of a State or Commonwealth that may involve Reportable Conduct; then

you may do so by either:

- notifying the LEQ Executive Director using our Reporting Reportable Conduct Form under this Procedure at **Appendix 2 – Reporting Reportable Conduct Form**; or
- notifying the QFCC directly.

For Workers of St James Lutheran College[1]

If you are a Worker of St James Lutheran College, and you become aware of a Reportable Allegation or Reportable Conviction about another Worker, you must, as soon as practicable:

- report the matter to the LEQ Executive Director using our Reporting Reportable Conduct Form under this Procedure at **Appendix 2 – Reporting Reportable Conduct Form**; or
- if the matter relates to the LEQ Executive Director, report the matter to the QFCC.

Stage 1: Document, Assess and Notify

Upon receiving notice of a Reportable Allegation or Reportable Conviction, the LEQ Executive Director must do the following:

- Keep appropriate **records**.
- **Assess** the information. The LEQ Executive Director will consider whether the information fits the definitions of Reportable Allegation or Reportable Conviction.
- **Let the Principal know -** The LEQ Secretariat will provide the Principal with a copy of any notification from you about a Reportable Allegation or Reportable Conviction as soon as practicable, unless the Reportable Allegation or Reportable Conviction is about the Principal.
- **Collaborate with the Principal to ensure the Principal has conducted an immediate risk assessment**. Risk management involves identifying risks, assessing their likelihood and potential harm and taking proportionate action to reduce or eliminate those risks.
- **Collaborate with the Principal to ensure the Principal takes immediate risk management action**. The LEQ Executive Director must be assured immediate risk management action has been taken including making any external reports to the police or regulators. The LEQ Executive Director should consider whether coordination is required with any police service.
- **Provide an Initial Report to the QFCC as required under the Policy.**

Note: The QFCC Guide to Queensland's Reportable Conduct Scheme provides guidance on QFCC's expectations on assessing the information, conducting an immediate risk assessment and taking immediate risk management action.

The Initial Report to the QFCC must be in the form required by the QFCC, or otherwise contain the following information:

[1] *Child Safe Organisations Act 2024* (Qld), s33(2).

- details of the reportable allegation or reportable conviction;
- the name, including any former name or alias, of the Worker the subject of the reportable allegation or reportable conviction;
- the date of birth of the Worker, if known;
- the name of the Head of Entity;
- whether the sector regulator for the reporting entity or a police service has been contacted about the reportable allegation or reportable conviction;
- St James Lutheran College's contact details, including its name, address and telephone number;
- if the Worker currently performs work for St James Lutheran College — any action, including risk management action, taken in response to the reportable allegation or reportable conviction, including, for example—
    - immediate steps taken to prevent the Worker from having contact with children;
    - any disciplinary action taken or proposed to be taken against the Worker; and
    - any other matter prescribed by regulation.

Stage 2: Investigate and Update

Investigation

All investigations will be conducted in accordance with the following best practice principles[2]:

- be child-centred and trauma-aware, minimising harm and distress to children involved
- endeavour to ensure cultural safety and inclusive practice particularly for Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds
- be planned, including outlining scope, tasks, responsibilities, interview sequencing and risk controls
- use recordkeeping in real-time, including an evidence log and interview notes where appropriate
- be impartial, free from conflicts of interest and bias
- ensure procedural fairness, giving the worker an opportunity to respond to the allegations and material relied upon (except where prohibited by a police service)
- maintain confidentiality, sharing information only with those who have a lawful and operational need to know
- consider specialist support for child interviews, cultural considerations, accessibility and communication needs
- ensure a high degree of collaboration between the LEQ Secretariat and St James Lutheran College.

To ensure procedural fairness and natural justice under the Policy, before finalising an investigation, the LEQ Executive Director will ensure that the Worker is provided with written notice of any proposed negative or adverse findings and enable them to provide written submissions about the proposed findings within a reasonably stated period[3].

Any written submissions provided by a worker in response to proposed findings must be considered in preparing the final report to the QFCC. Copies of the submissions must be provided to the QFCC.

If the LEQ Executive Director is not reasonably able to investigate a Reportable Allegation or Reportable Conviction (for example due to conflicts of interest or legal constraints), the LEQ Executive Director must provide written reasons to the QFCC as soon as practicable about why they cannot reasonably investigate.

[2] QFCC Guide to Queensland's Reportable Conduct Scheme, pg 38.
[3] *Child Safe Organisations Act 2024* (Qld), s36(3).

Interim Risk Assessment and Update

Throughout the matter, in the management of the Reportable Conduct Scheme matter, the LEQ Executive Director will keep the Principal updated, and collaborate closely with them.

If an investigation is not finished and St James Lutheran College cannot provide a final report, the LEQ Executive Director must give the QFCC an Interim Report within thirty (30) business days after the LEQ Executive Director becomes aware of the Reportable Allegation or Reportable Conviction, unless the QFCC agrees to a longer timeframe.

Interim Reports must be in the form required by the QFCC, or otherwise include the following information:

- the facts and circumstances of the Reportable Allegation or Reportable Conviction, to the extent it is available to the LEQ Executive Director;
- an update on any action, including risk management action, taken in response to the Reportable Allegation or Reportable Conviction; and
- if the Worker has made written submissions in relation to the Reportable Allegation or Reportable Conviction - a copy of the Worker's written submissions.

Stage 3: Finalise, Report and Implement

Principal's Responsibilities upon Investigation Conclusion

When the LEQ Executive Director concludes an investigation into a Reportable Allegation or Reportable Conviction, the Principal will conduct a final risk assessment having regard to the findings and outcomes of the investigation. The risk assessment must include a consideration of:

- the safety and wellbeing of the child or children and relevant family members, including any counselling, ongoing support needed or future contact with the Worker
- the wellbeing of the Worker, including any support, training or disciplinary action required
- organisational culture and expectations, including in relation to improved education and awareness regarding child safety and wellbeing
- systems and processes, including any work practices or gaps that contributed to the Reportable Allegation or Reportable Conviction, including missed opportunities for earlier detection
- whether St James Lutheran College or LEQ System policies and procedures require refinement

Final Report

The LEQ Executive Director's final report the QFCC must be in the form required by the QFCC, or otherwise contain the following information:

- information about the facts and circumstances of the Reportable Allegation or Reportable Conviction; and
- the findings made by the LEQ Executive Director about the Reportable Allegation or Reportable Conviction after completing the investigation, including whether or not the worker has engaged in Reportable Conduct; and
- the reasons for the findings; and
- copies of documents relied on by the LEQ Executive Director in making the findings[4]; and
- if the matter involves any other entities—information about whether the matter has been referred to another entity, including details of the other entity; and
- if the Worker currently performs work for St James Lutheran College —any action, including risk management action, taken in response to the Reportable Allegation or Reportable Conviction, including, for example—

[4] Examples of documents: (a) statements taken during the investigation; (b) documents mentioned in the report; (c) submissions made by the worker

- any immediate steps taken to prevent the worker from having contact with children; and
- any disciplinary action taken or proposed to be taken against the Worker; and

- any action taken, or proposed to be taken, to improve St James Lutheran College's ability to identify Reportable Conduct and to report and investigate Reportable Allegations and Reportable Convictions[5]; and
- if no action is to be taken—the reasons why no action is to be taken.

Communication & Confidentiality

Delivery of Initial, Interim and Final Reports to the QFCC

The LEQ Executive Director will ensure that initial, interim and final reports required under Part 5 of the Policy are delivered to the QFCC.

The LEQ Secretariat will provide the Principal with a copy of the initial, interim and final reports as soon as practicable after delivery of the relevant report to the QFCC (unless the Principal is the subject of a Reportable Allegation or Reportable Conviction under that report).

Confidentiality

Any person (including St James Lutheran College and you) have strict obligations under the *Child Safe Organisations Act 2024* (Qld) that stipulates that any person must not publish or cause to be published information that would:

- identify a person as someone who has notified of a Reportable Allegation or Reportable Conviction under Part 2 of this Procedure; and
- identify a child as a child who is the subject of a failure of conduct by a Worker that forms the basis of a Reportable Allegation or Reportable Conviction, or a finding that Reportable Conduct has been engaged in;

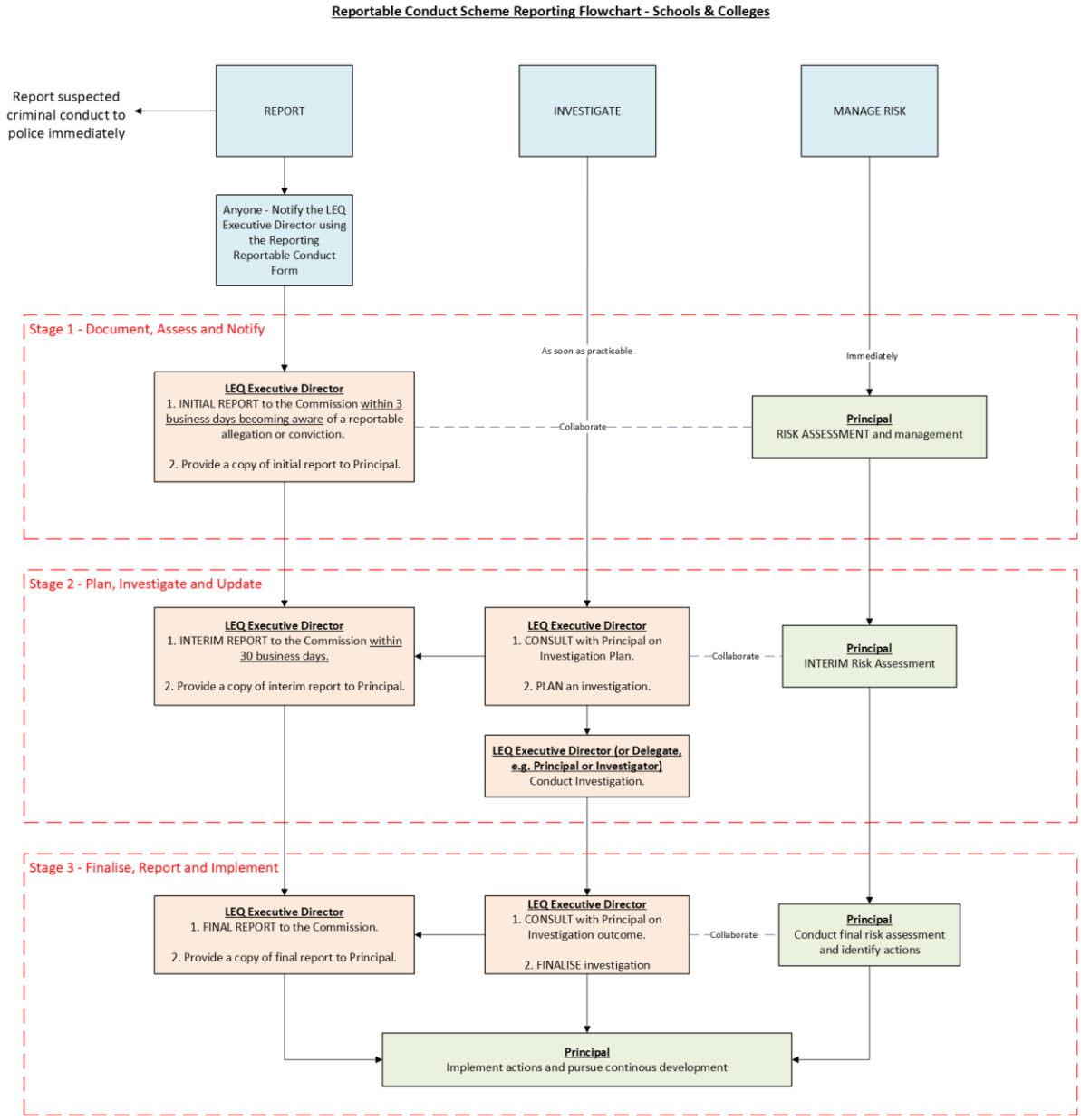
unless that publication is permitted under the limited exceptions in the *Child Safe Organisations Act 2024* (Qld)[6].

While we will seek to keep you and other stakeholders reasonably informed of outcomes, this means that we may not be able to share with you every development or document in your notification of a Reportable Allegation or Reportable Conviction.

[5] Examples of actions: (a) reviewing systems or policies; (b) improving the implementation of, and compliance with, the child safe standards and universal principle

[6] *Child Safe Organisations Act 2024* (Qld), s 58.

Appendix 1 – Flowchart: Reporting Reportable Conduct in a School



Appendix 2 – Reporting Reportable Conduct Form

Private and Confidential

Reporting Reportable Conduct Form

Complete this form and email it to the LEQ Executive Director at:

ReportableConduct@leq.lutheran.edu.au

My Details
Date:
Name of person making this report:
My connection to the School (e.g. Parent, staff member):
My contact details:

Details of the Student or Child at Risk	
School Name:	
Name of Student or Child:	
Age:	Sex descriptor:
Year Level:	Contact details for the student or child (if you have these details):

I would like to make a notification about the following Worker:
Name:
Are you aware of any conflicts of interest, or other relevant relationship the Worker has with the LEQ System?: Yes ☐ No ☐ Unknown ☐ Details:

Reportable Conviction - I believe the Worker has a Reportable Conviction	
Reportable Conviction Yes ☐ No ☐ Unknown ☐	Details of conviction:

Reportable Allegation – I reasonably believe that the Worker has committed Reportable Conduct or misconduct that may involve Reportable Conduct	
Type of Reportable Conduct, or misconduct that may involve Reportable Conduct ☐ 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 ☐ Behaviour that causes significant emotional or psychological harm to a child ***Note**: If your concern does not fit the above categories, or is reasonable behavioural management, a minor accident, reasonable restrictive practice/positive behaviour support or brief corrective feedback, it may not be Reportable Conduct. In that instance, you may wish to raise your concern under our Complaints Resolution Framework instead.*	Details of the Conduct:
Reasonable Belief Reasonable belief does not mean certainty or proof, or a final conclusion or finding about what happened. However, reasonable belief is based on facts and circumstances, not rumour or suspicion; formed after considering what is known at the time; or enough to justify taking action, such as reporting. If you are unsure, report your concern.	Details:
Indicate the identity of anyone else who may have information about the Reportable Allegation or Reportable Conviction:	
Additional information provided as an attachment **YES** ☐ **NO** ☐	

(Adapted from QFCC Guide to Queensland's Reportable Conduct Scheme)