

SAINTS CATHOLIC COLLEGE

REPORTABLE CONDUCT SCHEME PROCEDURE

Document Owner	Head of College / Chief Executive Officer
Responsible Officer	Head of College / CEO – Head of Reporting Entity
Legislative Basis	Child Safe Organisations Act 2024 (Qld) – Reportable Conduct Scheme
Related Diocesan Framework	Applicable Diocesan safeguarding, governance and RCS arrangements
Review Cycle	Three years, or earlier where a review trigger occurs

1. PURPOSE

This Procedure establishes how Saints Catholic College (SCC) receives, assesses, manages, reports, investigates and closes reportable conduct matters under Queensland's Reportable Conduct Scheme (RCS). It is intended to ensure prompt child-safety action, compliance with statutory reporting requirements, procedural fairness, appropriate employment action, secure recordkeeping and organisational learning.

The RCS operates alongside, and does not replace, other mandatory reporting, police reporting, Blue Card, safeguarding, employment, work health and safety or other legal and Diocesan obligations.

2. SCOPE

This Procedure applies to reportable allegations and reportable convictions concerning all workers performing work for SCC where the RCS applies. This includes employees, volunteers, contractors, consultants, trainees and subcontractors, including Residential Assistants and Mentors where they perform work for SCC. It covers SCC services, programs, facilities and activities, including relevant conduct outside work where the Scheme applies.

The Procedure applies to the internal management of RCS matters and to collaboration between SCC, the Catholic Diocese of Townsville, Senior Manager People and Safety / Human Resources, the Queensland Family and Child Commission (QFCC), Queensland Police Service (QPS), Blue Card Services and other relevant authorities.

3. PRINCIPLES

- Child safety and wellbeing are central to decision-making.
- A concern is acted on promptly; SCC does not wait for proof before taking necessary protective or reporting action.
- Statutory reporting timeframes are met independently of the progress of any employment or disciplinary process.
- Police or other statutory investigations are not prejudiced by SCC action.
- The worker who is the subject of an allegation is afforded procedural fairness, without compromising child safety.
- Information is shared only where authorised and reasonably necessary, and sensitive records are protected.
- Actual or perceived conflicts of interest are identified, documented and managed.
- RCS matters are used to identify system improvements and strengthen SCC's safeguarding controls.

4. DEFINITIONS

Term	Meaning
Head of Reporting Entity	For SCC, the CEO–Head of College. The Head of Reporting Entity holds the statutory responsibilities applicable to the head of the entity under the RCS. Permitted functions may be delegated to an appropriately qualified person, but overall responsibility remains with the Head of Reporting Entity.
Worker	A person performing work for SCC to whom the RCS applies, including employees, volunteers, contractors, consultants, trainees and subcontractors. Residential Assistants and Mentors are included where they perform work for SCC. The Scheme may also apply to relevant conduct of former workers in circumstances prescribed by the Act.
Reportable Conduct	Conduct within the categories prescribed by the Act: 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; or behaviour that causes significant emotional or psychological harm to a child.
Reportable Allegation	An allegation that a worker has engaged in reportable conduct, assessed in accordance with the Act and QFCC guidance. Notification is not dependent on the allegation first being proven.
Reportable Conviction	A conviction that falls within the RCS requirements under the Act.
RCS Matter Register	SCC's secure central record of matters received and assessed for possible application of the RCS, including reportable allegations and reportable convictions.

5. RESPONSIBILITIES

5.1 CEO–Head of College / Head of Reporting Entity

- maintain SCC systems to prevent, receive, assess, report, investigate and respond to reportable conduct;
- ensure concerns that may constitute a reportable allegation or reportable conviction are promptly assessed;
- ensure immediate child-safety and other risk-management action is taken;
- ensure QPS, QFCC, Blue Card Services, Child Safety and other external notifications are made where required;
- ensure QFCC initial notification occurs within 3 business days of becoming aware of a reportable allegation or conviction;
- ensure an interim report is provided to QFCC within 30 business days where required, and a final report is provided as soon as practicable after the investigation is completed;
- appoint or approve an appropriately qualified and sufficiently independent investigator, where required;
- ensure investigations are lawful, child-safe, timely and procedurally fair;
- ensure the RCS Matter Register and supporting records are maintained securely;
- oversee findings, child-safety responses, corrective action and organisational learning; and
- ensure material matters and systemic issues are escalated through applicable Diocesan governance pathways.

5.2 Pastoral Care Manager (PCM)

- support immediate resident safety and wellbeing assessment;
- develop, implement and monitor a Resident Safety Plan where required;
- coordinate appropriate pastoral and wellbeing support for affected residents and witnesses;
- assist the Head of Reporting Entity with relevant resident information and risk assessment;
- monitor for victimisation, retaliation or ongoing wellbeing concerns; and
- maintain appropriate pastoral records in accordance with confidentiality and recordkeeping requirements.

5.3 Business Manager (BM)

- support secure intake, documentation and preservation of relevant records and evidence;
- assist with immediate operational risk controls, including preservation of CCTV, access records and other time-sensitive evidence;
- maintain or support maintenance of the RCS Matter Register as directed by the Head of Reporting Entity;
- ensure access to sensitive RCS records is restricted to authorised persons;
- assist with implementation and tracking of organisational corrective actions; and
- support continuity of the RCS process where the Head of Reporting Entity is unavailable, without assuming statutory authority unless a lawful delegation has been made.

5.4 Senior Manager People and Safety / Human Resources

- provide specialist employment and human resources advice;
- coordinate employment-risk measures, including advice on stand-down or suspension where appropriate;
- ensure procedural fairness in employment-related processes;
- lead, coordinate or support workplace investigation activity where agreed;
- assist with allegation correspondence, worker responses and employment outcomes;
- liaise with SCC regarding information relevant to child-safety risk and the RCS investigation; and
- coordinate employment action with QPS or other statutory processes so those processes are not prejudiced.

5.5 All Workers

- immediately report any concern, allegation, disclosure or information that may involve reportable conduct through SCC's reporting pathway;
- not investigate the matter themselves unless formally authorised to do so;
- preserve relevant information and comply with reasonable directions concerning evidence;
- maintain confidentiality and privacy; and
- comply with immediate safety, safeguarding and risk-management directions.

6. REPORTING A CONCERN

A concern may be received verbally or in writing by any SCC worker. Any worker receiving information that may constitute reportable conduct must immediately escalate it to the CEO–Head of College, unless the matter concerns the CEO or the CEO has an actual, potential or perceived conflict of interest. In that case, the worker must immediately escalate the matter to the Bishop of Townsville through the Director

Safeguarding Culture and Shared Services, without referring the matter to the CEO. Workers and any other person may also notify the QFCC directly. Information must be documented as soon as practicable.

SCC may establish a dedicated secure email address and Reportable Allegation Assessment form as preferred recording mechanisms; however, a concern is not invalid merely because it was received through another channel.

Where information constitutes, or may constitute, a reportable allegation or reportable conviction, SCC must not delay a required statutory notification merely because assessment or investigation remains incomplete.

7. PROCEDURE

7.1 Stage 1 – Intake, Triage and Immediate Assessment (Hours 0–24)

- For matters not involving the CEO or a CEO conflict, the CEO–Head of College records the concern and determines whether further information is immediately required to understand the allegation and manage risk. For matters involving the CEO or a CEO conflict, the Diocesan pathway in section 8 applies instead.
- Immediate safety and wellbeing risks to the child or other children are assessed and protective action is taken.
- The need for immediate reporting to QPS, Child Safety, Blue Card Services or another authority is considered and actioned where required.
- Potentially relevant evidence is identified and preserved, including CCTV, electronic communications, access records, incident records and other documents.
- The CEO assesses whether the information constitutes or may constitute a reportable allegation or reportable conviction, using the Act and current QFCC guidance.
- A Reportable Allegation Assessment is completed and the matter is entered in the RCS Matter Register.
- The CEO and Diocesan Senior Manager People and Safety confer promptly on RCS, child-safety, employment-risk and investigation arrangements. This consultation does not displace the statutory responsibilities of the Head of Reporting Entity.

7.2 Stage 2 – Immediate Safety Actions and Notifications (Business Days 1–3)

- For matters not involving the CEO or a CEO conflict, the CEO ensures QFCC is notified within 3 business days of becoming aware of a reportable allegation or reportable conviction. For matters involving the CEO or a CEO conflict, the Diocese must arrange notification through the authorised pathway in section 8 without delay.
- Other required notifications, including QPS, Child Safety and Blue Card Services, are made in accordance with the applicable legal threshold and reporting requirement.
- The CEO, PCM and BM implement and document immediate child/resident safety measures, including a Resident Safety Plan where required.
- Diocesan People and Safety / HR manages employment-risk measures in consultation with the CEO, including any stand-down, suspension, altered duties or other interim controls.
- The timing of worker notification, interviews and employment action is coordinated with QPS or another investigating authority where necessary to avoid prejudicing a criminal or statutory investigation.
- The RCS Matter Register is updated with notifications, dates, reference numbers, immediate controls and responsible persons.

Where QPS or another statutory authority is investigating, SCC must coordinate its actions to avoid prejudicing or interfering with that investigation. This does not prevent SCC from taking immediate protective or employment-risk measures necessary to safeguard a child or other person.

7.3 Stage 3 – Investigation and Ongoing Risk Management

- An investigation is commenced as soon as practicable after required notification, subject to any direction or coordination required with QPS or another authority.
- For matters not involving the CEO or a CEO conflict, the CEO determines who is appropriately qualified and sufficiently independent to conduct the investigation, with Diocesan People and Safety / HR involvement as appropriate. For matters involving the CEO or a CEO conflict, the Diocese makes these arrangements under section 8.
- The investigator gathers and assesses relevant information, provides the worker with procedural fairness and documents the investigation process and evidence.
- Interviews with children or young people are undertaken only where necessary, appropriate and consistent with child-safe practice, having regard to any police or statutory investigation and the need to avoid repeated or unnecessary interviewing.
- The PCM monitors the ongoing wellbeing of affected residents and witnesses and the effectiveness of safety arrangements.
- SCC and Diocesan People and Safety / HR share information lawfully and on a need-to-know basis where it is relevant to child safety, investigation or employment-risk management.
- If the investigation is not complete within 30 business days, the CEO ensures the required interim report is provided to QFCC, including investigation progress and risk-management action taken.
- The RCS Matter Register is updated throughout the investigation.

7.4 Stage 4 – Findings, Outcomes and Closure

- The investigator makes and documents findings for each allegation in accordance with the Act, current QFCC guidance, the applicable standard of proof and procedural fairness requirements.
- RCS investigation findings are distinguished from any separate employment or disciplinary decision.
- For matters not involving the CEO or a CEO conflict, the CEO, with Diocesan People and Safety / HR advice where relevant, determines or implements appropriate employment, safeguarding and operational responses within the applicable authority. For matters involving the CEO or a CEO conflict, decisions are made through the authorised Diocesan pathway in section 8.
- The CEO ensures the final report is provided to QFCC as soon as practicable after the investigation is completed, including findings, reasons, relevant action and system-improvement measures as required.
- Affected children/residents and other relevant persons are provided appropriate information about outcomes where lawful and appropriate.
- The CEO confirms that immediate and longer-term risk controls have been implemented and that outstanding actions have responsible persons and due dates.
- The matter is closed in the RCS Matter Register only after statutory reporting, required actions, records and follow-up arrangements have been completed.

8. CONFLICTS OF INTEREST AND DELEGATION

Any actual, potential or perceived conflict of interest affecting an RCS matter must be identified, documented and managed.

Where a reportable allegation or reportable conviction concerns the CEO–Head of College (the Head of Reporting Entity), the matter must be escalated immediately to the Bishop of Townsville through the Director Safeguarding Culture and Shared Services. A worker receiving such a concern must use this pathway directly and must not refer the matter to the CEO. Workers and any other person may also notify the QFCC directly. The CEO must not receive the report through SCC’s ordinary pathway, assess, investigate, approve or finally determine the matter, except to the extent necessary to ensure that immediate child-safety action, police or mandatory reporting, risk controls or notification to the QFCC are not delayed. The Diocese must arrange an appropriately qualified and independent person to undertake permitted functions in accordance with the Act and applicable Instrument of Delegation. The conflict, delegation and decision-making arrangements must be documented.

Where the CEO has another actual, potential or perceived conflict of interest, the matter must likewise be escalated through the Director Safeguarding Culture and Shared Services for appropriate Diocesan direction and lawful delegation. Immediate child-safety action and required external notifications must not be delayed.

A delegation of functions does not remove the overall statutory responsibility of the Head of Reporting Entity where the Act provides that responsibility remains with that office.

9. INFORMATION SHARING, CONFIDENTIALITY AND PRIVACY

Information relating to RCS matters must only be collected, accessed, used and disclosed where authorised and reasonably necessary for child safety, investigation, employment, statutory reporting, legal or governance purposes. Access must be restricted to persons with a legitimate need to know.

Information sharing with QFCC, QPS, Child Safety, Blue Card Services, the Diocese and other authorities must occur in accordance with applicable law and authorised information-sharing arrangements.

10. SUPPORT AND PROTECTION FROM VICTIMISATION

Appropriate support will be made available to affected children/residents, witnesses and the worker who is the subject of the allegation. Support arrangements must preserve child safety, confidentiality, procedural fairness and the integrity of any investigation.

Victimisation, retaliation, intimidation or adverse treatment of a person because they raised a concern, participated in an investigation or supported an affected person is not acceptable and must be reported and addressed.

11. RECORDS AND RCS MATTER REGISTER

SCC will maintain a secure RCS Matter Register for reportable allegations, reportable convictions and matters assessed for possible application of the Scheme. The Register will record sufficient information to demonstrate receipt, assessment, immediate risk management, statutory notifications, investigation status, interim and final reporting, findings, outcomes, corrective actions and closure.

Supporting records may include the initial concern, Reportable Allegation Assessment, safety plans, evidence-preservation records, statutory notifications, investigation records, correspondence, findings, employment actions, QFCC reports and post-matter review records.

RCS records are highly sensitive and must be stored securely, with access restricted and retention managed in accordance with applicable legal, Diocesan and SCC recordkeeping requirements.

12. POST-MATTER REVIEW AND ORGANISATIONAL LEARNING

Following closure of a significant RCS matter, the CEO will ensure an appropriate post-matter review considers whether system gaps, control failures or organisational factors contributed to the matter or its management.

The review should consider whether changes are required to:

- the SCC Risk Register and Compliance Register;
- policies, procedures and the Code of Conduct;
- training, induction and supervision;
- recruitment, screening and employment controls;
- physical, environmental or access controls;
- resident safeguarding and pastoral arrangements;
- reporting, investigation or recordkeeping systems; and
- Diocesan or Council assurance reporting.

13. COMPLIANCE, MONITORING AND REVIEW

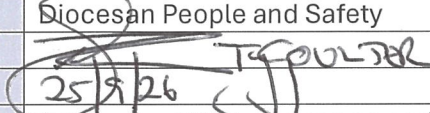
The CEO is responsible for monitoring implementation of this Procedure and ensuring SCC maintains evidence that RCS obligations and controls are operating.

This Procedure will be reviewed at least every three years and earlier following a significant RCS matter, material legislative or regulatory change, QFCC direction or guidance, change to Diocesan RCS arrangements, audit or review finding, or identification of a material control failure.

14. RELATED DOCUMENTS

- Child Safe Organisations Act 2024 (Qld)
- QFCC – Guide to Queensland's Reportable Conduct Scheme
- QFCC – Reportable Conduct Scheme forms and current guidance
- Applicable Diocesan Safeguarding Children and Vulnerable Adults Policy
- Applicable Diocesan Whistleblower Policy
- SCC Governance Framework
- SCC Compliance Register
- SCC Risk Register
- SCC Code of Conduct
- SCC Complaints Management Policy
- SCC Reportable Allegation Assessment [to be developed]
- SCC RCS Matter Register [to be developed]
- SCC Resident Safety Plan / safeguarding documentation, as applicable

15. DOCUMENT CONTROL

Policy / Procedure Owner	CEO - Head of College
Consultation	Diocesan People and Safety / Human Resources and relevant SCC managers
Validated By	Diocesan People and Safety
Authorised By	
Authorised Date	25/9/26
Next Scheduled Review	September 2029 - unless an earlier review is triggered