



Saint Stephen's College
CRICOS Provider Number 01938G

STUDENT SAFETY AND WELLBEING - RAISING AND RESPONDING TO CONCERNS POLICY AND PROCEDURE

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Introduction

Saint Stephen's College (the College) is committed to protecting its students from all forms of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

This policy sets out, in an accessible, child-focused, culturally safe and easily understood manner, the ways in which concerns about all forms of child abuse and other reportable conduct:

- May be brought to the College's attention; and
- Will otherwise be dealt with, both internally and in accordance with the College's external reporting obligations.

Other concerns may be raised by members of the College community in accordance with the College's *Complaints Resolution Policy and Procedure*.

Purpose

This document outlines how to respond to and report child abuse allegations and reportable conduct as part of the College's Student Safety and Wellbeing Framework (underpinned by the *Student Safety and Wellbeing Policy*), and for the purpose of Queensland's Child Safe Standards.

There are also additional reporting obligations that apply specifically within the context of the College's Early Learning Centre (ELC) environment. These are set out in the College's *Child Safety and Wellbeing Policy and Procedure – ELC*.

Scope

This policy applies to all Board members, employees, volunteers, contractors and other authorised personnel required to perform functions on the College's premises, or at College organised activities and events. Collectively, these individuals are referred to as "staff".

This policy extends to any other person who is engaged in student connected work at the College, or otherwise has direct and regular contact with the College's students (whether supervised or not).

Overview of Student Safety and Wellbeing Policies and Documents

Document	Overview
Student Safety and Wellbeing Policy	This policy sets out the College's overarching obligations and commitment to ensuring student safety and wellbeing and summarises the College's strategies for achieving these. The policy also explains how the College's other student safety and wellbeing policies and procedures interact.
Student Safety and Wellbeing - Staff Code of Conduct	This code outlines staff behaviours which align with the College's commitment to student safety and wellbeing, and what behaviours are unacceptable.

Student Safety and Wellbeing - Raising and Responding to Concerns Policy and Procedure	This document outlines how members of the College community may raise concerns about child abuse and reportable conduct. This document sets out how the College will respond to such concerns (including by complying with the College's mandatory reporting and reportable conduct obligations).
Student Safety and Wellbeing – Recruitment, Screening and Engagement Policy and Procedure	This document outlines the College's approach to ensuring student safety and wellbeing is a paramount consideration in the College's recruitment, screening and engagement practices. In this document, recruitment extends to all talent acquisition processes for all work/s, conducted by all workers, defined as staff in the <i>Student Safety and Wellbeing Policy</i> .
Child Safety and Wellbeing Policy and Procedure – ELC	This policy and procedure set out specific responsibilities, strategies and practices relevant to the operation of the College's ELC, and should be read in conjunction with the College's broader Student Safety and Wellbeing Framework.

Definitions

Schedule One of the College's *Student Safety and Wellbeing Policy* sets out the key definitions used in the College's Student Safety and Wellbeing Framework. For ease of reading, the following definitions are reiterated below.

Mandatory reporter has the meaning given to it by section 13E of the *Child Protection Act 1999* (Qld) (CP Act). It includes but is not limited to registered teachers (including early childhood teachers), staff with post-secondary qualifications employed in the care, education or minding of children, school principals, registered nurses, students in training to become teachers (who have been granted permission to teach under relevant legislation), registered psychologists, out of home care workers, early childhood workers and any other person referred to in section 13F of the CP Act.

Reportable Allegation means an allegation or other information that leads a person to form a reasonable belief that a staff member of the College has committed either reportable conduct or misconduct that may involve reportable conduct. This applies even if the behaviour is said to have happened outside school or not while the staff member was carrying out their school duties.

Reportable conduct means:

- 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.
- Behaviour that causes significant emotional or psychological harm to a child.

Reportable conviction means a conviction for an offence committed by a staff member against a law of a State or the Commonwealth that may involve reportable conduct.

A conviction includes:

- A finding of guilt, and the acceptance of a plea of guilty, by a court, whether or not a conviction is recorded.
- A spent conviction, or a conviction that has become spent under a law of another State or the Commonwealth.

Reportable suspicion (for the mandatory reporting regime) means a suspicion formed on reasonable grounds that a child:

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

Relevant Principles

Staff have a variety of mandatory reporting obligations in relation to child abuse and reportable conduct. The College is guided by this document to fulfil its own obligations and those of its staff members, and aims to ensure that:

- Staff, students and members of the College community feel encouraged to raise concerns in accordance with this document.
- Contact details of Student Safety and Wellbeing Officers are readily available and widely known to the College community.
- All concerns are treated seriously, with the utmost importance and are responded to in a prompt, appropriate, sensitive and thorough fashion.
- The College and its staff have knowledge and understanding of their legal reporting obligations and comply with these proactively.
- The College's processes for responding to concerns, and the complaints process generally, are legally compliant with regard to privacy laws, reporting obligations and employment law, culturally safe and broadly understood, including by children and young people, families and staff.
- Investigations are conducted fairly and without bias, promptly and without undue delay.
- All reasonable steps are taken to protect the identity and wellbeing of a student who is the subject of a concern, and no adverse action is taken against a person who raises a concern (or is a child or young person who is the alleged victim of child abuse or reportable conduct).
- All reasonable steps are taken to co-operate with law enforcement agencies regarding concerns, and concerns are reported to relevant authorities regardless of whether there is a legal obligation to do so.
- Members of the College community understand and have confidence in the processes that will be followed by the College in response to concerns.
- This policy is student-focused and can be easily understood by the College community, in particular students.

When complying with this document, it must be appreciated that fulfilling the roles and responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse or reportable conduct.

Raising Concerns

If you have a belief that a student is in immediate danger, you should immediately phone the Police on 000.

If you are a member of the College community (other than a member of staff), with a concern about child abuse or reportable conduct involving a student, then you are encouraged to raise that concern with the Principal, or a Student Safety and Wellbeing Officer.

Relevant contact details for the College's Student Safety and Wellbeing Officers are set out in the below table:

Name	Position	Contact details
Michael Kleidon	Principal	principalsoffice@ssc.qld.edu.au
Sam Holmes	Executive Director of International Education	exec.intl@ssc.qld.edu.au
Dane Oman	Dean of Senior Students	dean.senior@ssc.qld.edu.au
Leith Biggs	Head of Junior College	head.junior@ssc.qld.edu.au
Rachael Egerton	Director of Early Learning Centre	dir.elc@ssc.qld.edu.au
Student Safety and Wellbeing Officers can also be contacted via Reception on 07 5573 8600 .		

The College has appointed the Principal as its senior Student Safety and Wellbeing Officer. The Principal has an important role in the promotion and maintenance of a student safe culture at the College. The Principal is also responsible for ensuring overall College compliance with the processes outlined in this document.

Where a concern relates to a Student Safety and Wellbeing Officer, it should be reported to the Principal.

As the safety and wellbeing of students is the College's paramount consideration, you are encouraged to make a report, whether or not you have formed a belief or suspicion on reasonable grounds that child abuse or reportable conduct has occurred.

How staff will deal with their own concerns

Staff with concerns, or who are aware of concerns, about child abuse, other reportable suspicion, reportable conduct or a reportable conviction of a staff member, must address those concerns in accordance with this document.

Concerns about the Principal or the Board

Where a concern relates to the Principal or a Board member, concerns should be raised with the Chair of the Board via email at boardchair@ssc.qld.edu.au or via post: PO Box 441 Oxenford Queensland 4209. If the concern relates to the Chair of the Board, the concern should be raised with the Chair of the Risk and Compliance Committee via email at rcchair@ssc.qld.edu.au or via post: PO Box 441 Oxenford Queensland 4209.

In those circumstances, the Chair of the Board or Chair of the Risk and Compliance Committee will be responsible for meeting the Principal's responsibilities as set out in this document.

The College's response

This section sets out how the College will acknowledge a concern about child abuse or reportable conduct involving a student.

Receiving a concern

Staff, upon becoming aware of a concern, are required to:

- Listen to the concern in a considerate, patient and supportive manner (and appropriately where the concern is coming from a student).
- Identify the party or parties involved.
- Confirm the basic details, without seeking extensive information, casting judgment or asking suggestive or leading questions.
- Take a detailed file note.
- Remain balanced and not assess the validity of the concern(s) being raised.
- Explain that other people may need to be informed about the concern, in order to stop any inappropriate or unlawful behaviour and to comply with the College's legal obligations and procedures.
- Confirm that the College takes the concern seriously.
- Offer support to the student(s) involved in the concern, and their families. This may include encouragement to access confidential wellbeing and support services, either internal or external to the College.
- Outline the process that will be followed by the College in dealing with the concern, in accordance with this document.

Staff should then:

- Promptly and thoroughly manage the response of the College (including by monitoring the College's overall compliance with this document and accounting for alternatives if the staff member allocated to resolve the concern is unable to perform their role).
- Comply with their personal reporting obligations as set out in this document.
- Notify the Principal or a Student Safety and Wellbeing Officer about the concern.
- If a Student Safety and Wellbeing Officer is the subject of the concern, notify the Principal about the concern.
- If the Principal is the subject of the concern, notify the Chair of the Board about the concern.
- If the Chair of the Board is the subject of the concern, notify the Chair of the Risk and Compliance Committee.

The College will then take such steps as it considers appropriate to protect any student connected with a concern until it is resolved, including by ensuring that any mandatory reporting obligations are met and that allegations, suspicions or disclosures are made to relevant authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers), regardless of whether there is a legal obligation to report.

Resolving the concern

The College will investigate the concern where appropriate, which will ordinarily require a determination, on the balance of probabilities, whether the concern is substantiated or not.

When doing so, the College will take into account the diversity and characteristics of the College community to ensure equity is upheld and act to reduce barriers to inclusion.

The decision-maker will usually be the Principal (or their nominee), although where the concern relates to the alleged conduct or misconduct of the Principal then the decision-maker will be the Chair of the Board. The College may rely on legal or third-party assistance to investigate or determine the concern.

Where a concern involves allegations against a staff member, the College will need to notify the staff member about those allegations (to the extent that it is appropriate to do so, which may initially involve only notification that there has been a concern), outline the process to be followed, and advise the staff member about the process pending the resolution of the concern (which may, in appropriate cases include the staff member being stood down, without judgment, while the concern is being dealt with).

To the extent that the College decides it is appropriate or practicable to do so, any investigation will usually involve:

- Interviewing the subject of the concern and key witnesses or individuals (noting that more than one interview may be required).
- Reviewing relevant documents, correspondence and materials of substance.
- Taking notes of any interviews (or where appropriate, transcripts of audio recordings of any interviews) during the investigation.
- The relevant decision-maker determining whether, on the balance of probabilities, the concern is substantiated.

Witnesses being interviewed will not be unreasonably refused a support person.

If a concern is substantiated, the College will take appropriate action (which may, in the case of a current staff member, potentially include summary dismissal for serious misconduct). Even if a concern is not substantiated, the findings made by the College during the course of investigating the concern may, in certain cases, still result in disciplinary action (including dismissal).

Following the conclusion of its investigation, the College will indicate the outcomes of the investigation to:

- The person, or student who raised the concern.
- The person who is the subject of that concern (where appropriate).

- Any external authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers) to whom a report is required to be made.

The College may need to adjust this document to reflect the circumstances

This document applies regardless of whether the alleged behaviour, which is the subject of a concern, occurred on or outside College grounds, or concerns current or former students.

It may not be appropriate or possible for the College to investigate a concern in strict accordance with this document where a concern is raised with the College and:

- An investigation by Queensland Police or the Queensland College of Teachers relevant to the concern is ongoing.
- Civil or criminal proceedings relevant to the concern are ongoing.
- The concern relates to the conduct of current or former students.
- The concern relates to the conduct of former staff.

In such circumstances, the College will seek and act on legal advice to comply with this document to the extent it is appropriate to do so (and in particular, to protect the safety and wellbeing of all current students of the College).

Keeping the College informed

It is the College's preference that members of the College community (including students, staff, volunteers and parents) promptly inform the Principal or a Student Safety and Wellbeing Officer of any matters that are the subject of a potential reporting obligation under this document and relate to the College community, so that the College can coordinate information and support the Police, affected students and their families as required.

However, the College appreciates that in some cases it will be necessary for an external report to be made before the College is notified (and nothing in this document is intended to limit a person's right, or obligation, to make external reports). At the very least, the Principal, or a Student Safety and Wellbeing Officer, should be notified after an external report is made.

Reflection and continuous improvement

The College will analyse concerns and incidents to identify causes and (if applicable) systemic changes to inform continuous improvement.

Other considerations

Concerns relating to other students

This policy also applies to concerns involving the behaviour of other students.

For example, mandatory reporting obligations are not limited to the actions of staff, and the failure to disclose an offence can also apply to alleged sexual activity by adult students.

Where a concern involves child abuse or other inappropriate behaviour allegedly perpetrated by a student, the College will comply with its mandatory reporting obligations and may otherwise exercise its discretion to notify Queensland Police.

Subject to any Police clearance which may be required, the College will otherwise deal with student-on-student behavioural issues in accordance with its student behavioural management procedures and any other relevant student discipline procedures.

Information provided to students

Students are provided with age-appropriate information during class time and through College assemblies about what to do in response to an allegation of suspected child abuse and the need to promptly alert a member of staff if they believe that they, or a peer, is suffering from child abuse or reportable conduct.

Information provided to students includes, but is not limited to:

- Remain calm.
- Promptly seek help and speak to a trusted staff member (including a Student Safety and Wellbeing Officer) about the concern.
- Remember this is not your fault, you are not to blame and are not in trouble.
- Tell the story in your own words, with as much detail as you can.
- Do not be afraid of saying the “wrong” thing.
- Listen carefully to any instructions you receive from staff (or if applicable, the Police or other authorities).
- Listen carefully to information you receive from staff about what will happen next (for example, and subject to the circumstances, authorities notified, parents informed, internal and/or external investigation).
- Be reassured that you have done the right thing.

Records

The College will make, keep and secure clear and contemporaneous records of any concerns raised in accordance with this document, and the steps taken by the College to respond to those concerns.

Support

The College will afford appropriate support to students the subject of, or otherwise connected to, concerns raised under this document, particularly until the concern is resolved.

If a concern involves a student who identifies as Aboriginal or Torres Strait Islander, or is from a culturally and/or linguistically diverse background, has a disability or is otherwise vulnerable (including without limitation students who identify as LGBTIQ+, or are unable to live at home), steps will be taken to ensure that the student, and their family, is supported to understand the situation and are supported (including via the use of an interpreter where required).

The College will also provide appropriate support to staff who make mandatory reports under this document, or who are assisting the College or families with the process outlined in this document.

Cooperation with authorities

The College will cooperate with any external authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers or other sector regulator) in relation to a concern or report (whether made under this document or otherwise).

Confidentiality

Appropriate confidentiality will be maintained at all times when dealing with concerns under this document, with information only being provided to those who have a right to know or otherwise on a “needs to know” basis.

Communication

Where appropriate, the College will provide parents, carers and guardians with guidance and support where a student is the subject of a concern.

Staff do not require consent from a student’s parents before making a mandatory report in accordance with this document. Similarly, staff are not required to disclose that a mandatory report has been made.

However, the College will keep families updated as it considers appropriate about the way in which it is dealing with concerns affecting that family’s child.

Victimisation is not tolerated

The College will not tolerate victimisation towards someone because they have raised or participated in a process contemplated by this document, including by raising a concern or making a mandatory report.

Claims for child sexual abuse

The College’s Student Safety and Wellbeing Framework (including this document) contains strategies which demonstrate how the College remains eternally vigilant about managing the risk of betrayal of trust; and will respond to concerns and reports about child abuse.

Where a survivor has experienced child sexual abuse for which the College is responsible as an institution, the College is committed to providing that individual with appropriate and trauma-informed redress.

Whilst decisions about offers of redress will be dictated by the relevant circumstances, offers will ordinarily include one or more of a direct personal response, access to professional counselling and psychological care, and, where appropriate, financial compensation.

Communication and Implementation

The College Board is responsible for ensuring:

- The College's staff and students, and students' parents and guardians, are made aware of the College's student safety and wellbeing policies and practices; and
- Staff are trained annually in implementing the College's student safety and wellbeing policies and practices;
- The College is implementing the processes;
- The processes are readily accessible by staff, students, parents and guardians.

The College complies with these obligations by:

- Making this document publicly available on the College's website.
- Making this document available to staff as part of the College's and the Board's internal policies and procedures. Aspects of (and updates to) the College's Student Safety and Wellbeing Framework, including this document will be addressed in the College's professional development updates, training programs and newsletters.

To comply with these obligations:

- The Board and Principal will review this document and the College's child safety and wellbeing practices at least every two years (or more frequently, including in response to legislative amendments, a significant incident, changes to the College's internal procedures or practices, or otherwise as requested by the Principal) and implement improvements where applicable.
- Families and members of the College community will be provided with opportunities to give feedback on this document and the broader Student Safety and Wellbeing Framework, via appropriate feedback mechanisms made available from time to time. This feedback will inform the College's ongoing review, development and continuous improvement of its policies, procedures and practices.
- The Principal is responsible for monitoring staff compliance with this document.
- All staff must ensure that they abide by this document and assist the College implementing this document.

The College's Mandatory Reporting Obligations

Schedule One sets out the main mandatory reporting obligations that apply to the College and its staff.

Concerns Regarding Compliance with this document

If a person believes that the College, or any staff member responsible for student safety and wellbeing, is not complying with the College's student safety and wellbeing policies or procedures, they should raise the concern in accordance with the College's *Complaints Resolution Policy and Procedure*.

For the avoidance of doubt, where a complaint concerns non-compliance by the Principal, the complaint must be directed to the Chair of the College Board.

Where non-compliance with the processes outlined in this document is established, the College will take appropriate remedial action. Such action may include, depending on the circumstances:

- Providing support to any impacted person.
- Making changes to relevant College policies or procedures.
- Delivering professional development or coaching for staff members.
- Taking disciplinary action where appropriate.

Schedule One: Mandatory and Other Reporting Obligations

Reporting a child abuse offence: Failure to report offence

The *Criminal Code Act 1899* (Qld) makes it a crime to fail to report an abuse offence against a child.

As a result, anyone (and not just professionals who work with the College's students, or with children and young people generally) aged 18 or over must make a report to Queensland Police if they form a reasonable belief that an abuse offence has been committed against another person who was a child (under the age of 16 years, or a person with an impairment of the mind) at the time of the alleged offence.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof, but is more than suspicion, rumour or assumption. A 'reasonable belief' exists when there is enough information that would lead a reasonable person to believe that the alleged conduct may have occurred. There must be some objective basis for the belief. For example, a 'reasonable belief' might be formed if:

- A student states that they have been sexually abused.
- A student states that they know someone who has been sexually abused (sometimes the student may be talking about themselves).
- Someone who knows a student states that the student has been sexually abused.
- Professional observations of the student's behaviour or development lead a professional to form a belief that the student has been sexually abused or is likely to be abused.
- Signs of abuse lead to a belief that the student has been sexually abused.

If you are not sure whether you have a reasonable belief, you must consult with the Principal, a Student Safety and Wellbeing Officer, or the appropriate body to which a report must be made.

If you have formed a reasonable belief in relation to an abuse offence, you must immediately report the belief to Queensland Police by calling 000 in an emergency.

You must then make a further report on each occasion on which you become aware of any further reasonable grounds for the reasonable belief.

Please note that fulfilling the roles and responsibilities contained in this document does not displace or discharge any other obligations that arise if you reasonably believe that a child is at risk of child abuse.

Failure to make a report without reasonable excuse is an offence under section 229BC of the *Criminal Code Act 1899* (Qld).

However, it may not be an offence not to disclose an abuse offence against a child to Queensland Police if you have a reasonable excuse. You may have a reasonable excuse if you:

- Have a reasonable fear that disclosing the information would endanger the safety of any person (other than the alleged perpetrator of the child abuse offence).
- Believe on reasonable grounds that the information has already been reported to Queensland Police by another person or Queensland Police already have that information.

If there is uncertainty about the need for a report to Queensland Police (or another body) you should seek advice from the Principal or a Student Safety and Wellbeing Officer about whether you are still required to make a report.

The Reportable Conduct Scheme

The *Child Safe Organisations Act 2024* (Qld) established the Reportable Conduct Scheme (Scheme) managed by Queensland Family and Child Commission (QFCC), which commences on 1 July 2026. The Scheme requires the College to report and investigate reportable allegations and convictions (as defined in the **Schedule One: Definitions** section of the College's *Student Safety and Wellbeing Policy*) against a member of staff.

A staff member who becomes aware of a reportable allegation or conviction must:

- Report the matter to the Principal.
- If the matter relates to the Principal, report the matter to the QFCC. The College also requires the staff member to report the matter to the Chair of the Board.

The Principal (or their delegate) will notify QFCC of any reportable allegation or conviction that may involve reportable conduct in respect of a staff member.

A disclosure can be via the process available on QFCC's website. QFCC may also be contacted by phone on (07) 3900 6000 in relation to any queries.

Further, the Scheme requires the head of an entity (the Principal) to do certain things upon becoming aware of a reportable conduct allegation or conviction about a member of staff. These obligations include, but are not limited to, managing any immediate risks to students, making reports as required by law and investigating the allegations when appropriate clearance has been received (refer below).

Where a reportable allegation or conviction is about the Principal, the Chair of the Board will assume responsibility for complying with the head of entity's obligations under the Scheme.

As soon as practicable after becoming aware of a reportable allegation or conviction, the Principal must respond to the reportable allegation or conviction by making the notifications to QFCC and investigating the allegation or conviction:

- Initial notification – within three (3) business days after becoming aware of the reportable allegation or conviction.
- Commence investigation – as soon as practicable after becoming aware of the reportable allegation or conviction, the Principal must:
 - Ensure an investigation of the reportable allegation or reportable conviction is conducted.
 - Notify the QFCC that the investigation is being conducted and provide contact details for a person the commission may contact in relation to the investigation.
- Update within thirty (30) business days after becoming aware of the reportable allegation or conviction, provide an interim report if the investigation is not yet complete, outlining:
 - The facts and circumstances of the reportable allegation or conviction, to the extent they are available.
 - An update on any action, including risk management action, taken in response to the reportable allegation or conviction.
 - If the staff member has made written submissions to the Principal in relation to the reportable allegation or reportable conviction—a copy of the staff member’s written submissions.

If the investigation is complete, the Principal must provide the final report.

- Outcome – as soon as practicable provide the final report. The content of a final report includes but is not limited to:
 - Information about the facts and circumstances of the reportable allegation or conviction.
 - The findings the Principal has made about the reportable allegation or conviction after completing the investigation, including whether or not the staff member has engaged in reportable conduct.
 - The reasons for the findings.
 - Copies of documents relied on by the Principal in making the findings.

Mandatory reporting

Mandatory reporters (as defined below in **Schedule One: Definitions** in the College’s *Student Safety and Wellbeing Policy*) have mandatory reporting obligations under the *Child Protection Act 1999* (Qld) (CP Act). Failure to make a mandatory report can constitute an offence under that Act.

A ‘mandatory reporter’ has the meaning given to a prescribed person by section 13E of the *CP Act*. It includes but is not limited to principals and teachers in any educational institution (including a kindergarten), registered or enrolled nurses, registered psychologists, persons who provide child care or child care services for fee or reward, persons concerned in the management of approved education and care services and any other person referred to in section 13F of the *CP Act*.

If you are a mandatory reporter, and in the course of your work, you know, or believe or suspect on reasonable grounds that a child:

- has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- may not have a parent able and willing to protect the child from the harm,
- a “reportable suspicion” as defined by section 13E(2) of the CP Act),

you must immediately make a report to the Department of Families, Seniors, Disability Services and Child Safety through the regional Child Safety Services Centre during business hours, or the Child Safety After Hours Service Centre on 1800 177 135 after hours. Additional reports must be made on each occasion where a mandatory reporter becomes aware of any further reasonable grounds for the belief or suspicion.

‘Harm’ is defined in section 9 of the CP Act to mean any detrimental effect of a significant nature on a child’s physical, psychological, or emotional wellbeing.

It is immaterial how the harm is caused.

It may result from physical, psychological, or emotional abuse or neglect, or sexual abuse or exploitation. Harm may occur as a single incident or through a series or combination of acts, omissions, or circumstances.

Staff must check whether they are mandatory reporters.

A mandatory reporter must make a report even if a Student Safety and Wellbeing Officer does not share their belief or suspicion that the report must be made. The College will afford support where appropriate to mandatory reporters who make a report under this document.

Under section 13I of the CP Act, a relevant person is not required to give a report under section 13G until the person has formed a reportable suspicion about a child, and once a relevant person has formed a reportable suspicion about a child, the person must make a mandatory report even if they are taking, or have taken, other action in relation to the child.

Section 13G(2) of the CP Act prescribes that a mandatory report of harm must:

- State the basis on which the person has formed the reportable suspicion.
- Include the information prescribed by regulation, to the extent of the person’s knowledge.

Regulation 4 of the *Child Protection Regulation 2023* (Qld), provides that the following information is prescribed for the purposes of a mandatory report made pursuant to section 13G(2) of the CP Act:

- The child’s name, age and sex descriptor.
- Details of how to contact the child. This may include:
 - The address at which the child usually lives.
 - The name and address of the school the child attends.
 - The child’s current location.
- Details of the harm or risk of harm to which the reportable suspicion relates, including the grounds for the reporter’s belief and the information on which the reportable suspicion is based.
- 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 relate.
- Particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates.

A report should also include any other information known to the reporter that may assist the Department in assessing the child’s protection needs.

In addition to the mandatory reporting obligations, any person (including staff) who reasonably suspects that a child may be in need of protection may report their concern to the Department.

A 'child in need of protection' is defined in section 10 of the CP Act to mean a child who has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and does not have a parent able and willing to protect the child from the harm (even if that risk is not caused by suspected physical or sexual abuse, which would make the risk a reportable suspicion).

Reporting sexual abuse or likely sexual abuse

Sections 366 and 366A of the *Education (General Provisions) Act 2006* (Qld) (EGP Act) and regulations 68 and 69 of the *Education (General Provisions) Regulation 2017* (Qld) provide specific legal obligations for responding to concerns or suspicions of sexual abuse or likely sexual abuse of a child or young person by the College.

Staff Reporting Obligations

All staff members must comply with the mandatory reporting requirements (as applicable) under the EGP Act.

A staff member must immediately report in writing to the Principal (or a member of the College's Board) if, in the course of their employment, the staff member becomes aware, or reasonably suspects, that any of the following individuals have been sexually abused or are likely to be sexually abused by another person:

- A student under 18 years attending the school.
- A kindergarten-age child registered in a kindergarten learning program at the school.
- A person with a disability who, under section 420(2) of the EGP Act, is being provided with special education at the school and is not enrolled in the preparatory year.

This obligation arises regardless of when or where the alleged harm occurred, and regardless of whether the alleged perpetrator is a staff member, another student, a family member, or another person.

Principal and Board Member Reporting Obligations

Upon receiving a written report from a staff member, the Principal or Board member must immediately provide a written report to a police officer.

If the Principal is the first person to become aware of or reasonably suspect sexual abuse or likely sexual abuse, the Principal must:

- Provide a written report directly to a police officer immediately.
- Inform the Board Chair and immediately provide them with a copy of the report.

Required Contents of a Report

A report of sexual abuse or likely sexual abuse must contain the information required under sections 68 and 69 of the *Education (General Provisions) Regulation 2017* (Qld). This includes:

- The name of the person giving the report.
- The student's name and sex.
- Details of the basis for the person becoming aware, or reasonably suspecting, that the student has been or is likely to be sexually abused by another person.
- Details of the abuse or suspected abuse (where abuse is suspected to have occurred).
- Any of the following information of which the person is aware:
 - The student's age.
 - The identity of the person who has sexually abused, is suspected of having sexually abused, or is suspected to be likely to sexually abuse, the student.

- The identity of anyone else who may have information about the abuse, suspected abuse or about the suspected likelihood of abuse.

Queensland College of Teachers

Sections 76 and 77 of the *Education (Queensland College of Teachers) Act 2005* (Qld) require the College to notify the Queensland College of Teachers if it deals with an allegation of harm caused, or likely to be caused, to a child because of the conduct of a teacher, and notify the Queensland College of Teachers of the outcome of the dealing.

Contacting Child Safety Services Centres

Child Safety Services Centres may also be contacted where a staff member forms concerns about a student's wellbeing but a mandatory report is not required.

Examples of situations where contacting the Child Safety Services may be appropriate, but may not necessarily enliven mandatory reporting obligations, include:

- Significant parenting problems that may be affecting the student's development.
- Family conflict, including family breakdown.
- A family under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement.
- Young, isolated and/or unsupported families.
- Significant social or economic disadvantage that may adversely impact on a student's care or development.

Many cases will not fit neatly into these categories. For guidance about whether contacting the Child Safety Services Centres should be considered, staff can refer to the College's Student Safety and Wellbeing Officers and information available on the Department of Families, Seniors, Disability Services and Child Safety website.

Child Safety may be contacted through the regional Child Safety Services Centre during business hours on 07 5675 4300, or the Child Safety After Hours Service Centre on 1800 177 135 outside of usual business hours.

Schedule Two: Student Safety and Wellbeing Record Requirements

Where We Keep Records Related to Student Safety and Wellbeing

The Principal is responsible for keeping all records relating to student safety and wellbeing incidents or concerns, including records of allegations, investigations and findings made, up to date and secure.

The College retains hardcopy and softcopy records relating to actual or alleged child abuse or reportable conduct securely and confidentially, with access limited to authorised persons in accordance with the College's recordkeeping practices. Hardcopy and softcopy records are maintained in the College's secure recordkeeping systems.

Where a student safety and wellbeing incident or concern relates to an allegation against a staff member (including about breaches of the College's *Student Safety and Wellbeing – Staff Code of Conduct*), records may also be maintained as part of Reportable Conduct records and Human Resources Management records. Human Resources Management record management is disclosed in the College's *Student Safety and Wellbeing – Recruitment, Screening and Engagement Policy and Procedures*.

Documenting the Student Safety and Wellbeing Incident or Concern and the College's Response

Documenting observations and communications about all student safety and wellbeing incidents or concerns, including those that do not meet the relevant threshold for external reporting, ensures that:

- All information about individual students can be taken into account should future student safety and wellbeing incidents or concerns arise.
- Any patterns that might arise from student safety and wellbeing incidents or concerns can inform reviews of the College's student safety and wellbeing strategies.

Therefore, all observations of and verbal and written communications about student safety and wellbeing incidents or concerns (including notes of observations, student disclosures, meetings and telephone calls) must be properly documented, regardless of whether or not the student safety and wellbeing incident or concern meets the relevant thresholds for external reporting. The records should include dates and times and enough detail to record key observations or conversations, especially those relating to the student's disclosure.

In addition, where a staff member:

- Believes on reasonable grounds that a student is in need of protection as a result of physical or sexual abuse, such that a Mandatory Report to Department of Families, Seniors, Disability Services and Child Safety has been or will be made.
- Believes on reasonable grounds that a student is in need of protection for any reason or is in need of therapeutic treatment for sexually abusive behaviour, such that a Non-Mandatory Report to Department of Families, Seniors, Disability Services and Child Safety has been or will be made.
- Has significant concerns for the wellbeing of a student, such that a Non-Mandatory Report to Department of Families, Seniors, Disability Services and Child Safety has been or will be made.
- Believes on reasonable grounds that a sexual offence has been committed against a child, or that student sexual offending has occurred, such that a Report to Police has been or will be made.
- Believes that other circumstances exist such that a Non-Mandatory Report to Police is required, they must record written and dated notes of their observations and concerns to assist in reporting the concerns to Department of Families, Seniors, Disability Services and Child Safety or Police.

How to Document the Student Safety and Wellbeing Incident or Concern

The College requires all student safety and wellbeing incidents and concerns to be recorded.

Employees should use the Report a Concern mechanism provided on the Web Portal to document all student safety and wellbeing incidents and concerns, including observations, beliefs,

suspicious, disclosures or allegations of student abuse or other harm. This online form must be used regardless of whether the alleged perpetrator may be a parent/carer/guardian, other student, staff member, or any other person. Employees should only record what information is observed or offered during the incident, disclosure or allegation and then be sure to report the matter in accordance with this document.

For volunteers, venue hirers, contractors and other external visitors, a Student Safety and Wellbeing Officer may complete the form on their behalf. This is reflected in the visitor sign-out process, which volunteers, venue hirers, contractors and other external visitors are required to follow when departing the College campus.

Where additional information, notes and records relating to a student safety and wellbeing incident or concern are identified, records must be updated as critical actions are completed. Records relating to mandatory reports must be managed and updated by a Student Safety and Wellbeing Officer. Records relating to reportable conduct matters must be managed and updated by the Principal or their delegate. All critical actions listed on the form must be completed for the incident to be closed.

Notes and records may include:

- Handwritten notes taken during a disclosure by a student.
- Copies of any written reports made to the Police or external bodies about the matter.
- If the allegation includes claims of inappropriate online activity, any digital copies of correspondence between the student and the person or staff member who is the subject of the allegation.

Reportable Conduct Records

When a reportable allegation is made under the *Child Safe Organisations Act*, the College must document certain information throughout the Reportable Conduct process:

- The concern or allegation.
- The College's initial response to the person making the allegation, the alleged victim(s) and the employee who is the subject of the allegation.
- Any communication with the Police or other authorities.
- An initial report made to the QFCC.
- Any Investigation Plan, detailing how the investigation is to be carried out.
- Any risk assessment conducted by the College.
- All interviews including details of questions and responses. Details should also include the location of the interview, who was present and start and finish times.
- Any decision made, both during and at the conclusion of the investigation, including the person making the decision's rationale, the position and name of the person making the decision and the date that the decision was made.
- Any personal contact, discussions or emails with anyone about the matter (including dates, details of discussions, questions, advice, outcomes, the name of the person making the contact, details of their position and where appropriate, the reason for the contact).
- Any investigation report.
- Any mandatory reports.
- The final report for the QFCC that sets out details of the findings in relation to each allegation and the reasons for the findings, the final risk assessment which includes any final decision

about the employee and the factors that have been considered and any subsequent action that is to be or has been taken.

All records created in accordance with the Reportable Conduct Scheme, including all allegations, outcomes of internal investigations and decisions to make or not make a report to the QFCC are maintained by the College.

The College keeps these records in a file that is separate to the employee's personnel file and retains them indefinitely.

Mandatory Reporting Records

Where a mandatory report is made under the *Child Protection Act* or the *Education (General Provisions) Act*, the College must retain certain documentation, specifically the initial report via the Staff Referral Form. All records related to the mandatory report are maintained by the College.

Record Keeping About Information Sharing

The College must record the following information when sharing, or responding to a request to share, information about the safety, welfare and wellbeing of a student (Request for Information):

- Who requested the Information and the date of the request (if any).
- Who shared the Information.
- Why the Information was shared (e.g. whether it was shared pursuant to a statutory or other legal obligation).
- Who the Information was shared with.
- Whether informed consent was sought from, and if so whether it was provided by, the student and/or their parent/carer/guardian.
- The approval of the Principal or delegate to share the Information.
- The date that the Information was shared.

Whenever a Request for Information is made to the College or the College otherwise shares Information, the person managing the Information sharing request or disclosure must record the above information in the Information Sharing Request Form.

Recording Other Student Safety and Wellbeing Actions

Section 33D of the *Civil Liability Act 2003* (Qld) imposes a duty of care on the College, as a child-related organisation, to take reasonable steps to prevent the abuse of a child by a person associated with the institution while the child is under the care, supervision, control or authority of the institution.

If a person brings a negligence claim against the College in relation to alleged physical or sexual abuse said to have occurred at the College, or to have involved staff employed or engaged by the College, a court will presume that the College breached its duty of care unless the College can prove that it took reasonable steps to prevent the abuse.

Whether or not the College took reasonable steps will be assessed by the court in accordance with considerations set out in the *Civil Liability Act* and case law.

It is critical that the College maintains accurate and comprehensive records not only of student safety and wellbeing incidents and concerns involving staff, but also of:

- Actions taken in response (including systemic reviews and resulting improvements).
- Biennial reviews of and improvements to the College's student safety and wellbeing policies, procedures, work systems and strategies.

These could be required as evidence in relation to possible future negligence claims against the College for damages in respect of student physical or sexual abuse.

The following records may assist in demonstrating reasonable precautions taken by the College to prevent the physical or sexual abuse of its students:

- Records that document actions taken by the College in response to specific student safety and wellbeing incidents and concerns (refer to How to Document the Student Safety and Wellbeing Incident or Concern section of this document above).
- Records that document the implementation of the College's student safety and wellbeing risk management strategies.
- Records that document reviews and improvements of our student safety policies, procedures, work practices and systems.
- Records that document the student safety and wellbeing training provided to and completed by staff members.

Source of obligation

Child Safe Organisations Act 2024 (Qld)

Child Protection Act 1999 (Qld)

Criminal Code Act 1899 (Qld)

Disability Discrimination Act 1992 (Cth)

Education (Accreditation of Non-State Schools) Act 2017 (Qld) and associated regulation

Education (General Provisions) Act 2006 (Qld) and associated regulation

Education (Queensland College of Teachers) Act 2005 (Qld)

Education and Care Services National Law (Queensland) and associated regulation

Education and Care Services Act 2013 (Qld)

Working with Children Check Act 2000 (Qld)

Public Records Act 2023 (Qld)

National Quality Framework

Code of Ethics for Teachers in Queensland

Related policies and procedures

Saint Stephen's College Strategy: Aspirations towards 2034

Saint Stephen's College Statement of Commitment to Student Safety and Wellbeing

Saint Stephen's College Student Safety and Wellbeing Policy

Saint Stephen's College Student Safety and Wellbeing - Staff Code of Conduct

Saint Stephen's College Student Safety and Wellbeing – Recruitment, Screening and Engagement Policy and Procedure

Saint Stephen's College Student Code of Conduct

Saint Stephen's College Staff Code of Conduct

Saint Stephen's College Parent Code of Conduct

Saint Stephen's College Complaints Resolution Policy and Procedure

Saint Stephen's College Drugs, Alcohol and Smoking Policy

Saint Stephen's College Risk Management Framework

Saint Stephen's College Student Disability Discrimination Policy and Procedure

Saint Stephen's College Privacy Policy

Saint Stephen's College Records Management Policy

Saint Stephen's College Staff as Parent Policy

Saint Stephen's College The Service of Alcohol at Saint Stephen's College

Saint Stephen's College Work Health and Safety Policy

Related documents

Saint Stephen's College Operational Risk Register

Saint Stephen's College Register of College Student Safety and Wellbeing Officers

Saint Stephen's College Central Register

Saint Stephen's College Worker Register

Saint Stephen's College Reporting a Concern Form

Saint Stephen's College Staff Referral Form

Saint Stephen's College Training Matrix

References

[Laws targeting sexual offences against children | Queensland Government](#)

[Child Protection Guide | Department of Families, Seniors, Disability Services and Child Safety](#)

[Reporting and referring concerns | Department of Families, Seniors, Disability Services and Child Safety](#)

[Children and young people in care | Department of Families, Seniors, Disability Services and Child Safety](#)

[Child Protection Guide | Department of Child Safety, Youth and Women](#)

Australian Human Rights Commission National Principles for Child Safe Organisations

United Nations Convention on the Rights of a Child

Australian Society of Archivists: Records Retention Schedule for Non-Government Schools, 2nd Edition

Document history

Version	Date	Author	Amendments
1.1	June 2026	Context provided by Russell Kennedy (Contextualised and formatting by the College's Director of Risk and Compliance)	Updates to reflect the introduction of the Reportable Conduct Scheme.
1.0	November 2025	Context provided by Russell Kennedy (Contextualised and formatting by the College's Director of Risk and Compliance)	First version of document.

