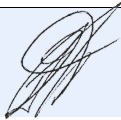




## **Child Safe Complaint Reporting Policy**

|                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy Title</b>                          | <b>Child Safe Complaint Reporting Policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Original issue date</b>                   | 5/02/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Delegate</b>                              | Commissioner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Authorisation</b>                         |                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Approval Date</b>                         | 5/02/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Effective date</b>                        | 5/02/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Review date</b>                           | 05/02/2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Alignment to Strategic Plan 2023-2027</b> | <ul style="list-style-type: none"> <li>• Support the restoration of socially responsible standards of behaviour and local authority in welfare reform communities</li> <li>• Help people in welfare reform communities to resume primary responsibility for the wellbeing of their communities and the individuals and families of their communities</li> <li>• Create a capable, culturally safe, agile and innovative organisation</li> <li>• Improve engagement through co-design and partnerships</li> </ul> |

## 1.0 Policy Statement

The Family Responsibilities Commission (FRC) is committed to providing a child safe environment where the safety, wellbeing, and dignity of children and young people is paramount. This policy establishes clear, consistent, and lawful processes for identifying, responding to, recording, and reporting child safety concerns, disclosures, and allegations.

All FRC employees, Local Commissioners, contractors, volunteers, and visitors must comply with this policy. Failure to report child safety concerns may result in disciplinary action and, in some circumstances, criminal penalties.

## 2.0 Scope

This policy applies to all FRC personnel and any person engaged by or representing the FRC who becomes aware of, receives, or observes a child safety concern in the course of their duties.

While the FRC does not provide direct services to children, its work involves engagement with families and communities where children may be present, impacted, or indirectly affected. This policy applies regardless of whether the alleged conduct involves FRC personnel or external parties.

## 3.0 Legislative and Policy Context

This policy is informed by and must be read in conjunction with relevant Queensland legislation, including but not limited to:

- *Child Safe Organisations Act 2024*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Child Protection Act 1999*
- *Criminal Code Act 1899*
- *Family Responsibilities Commission Act 2008*
- *Public Sector Act 2022*
- *Public Interest Disclosure Act 2010*
- *Information Privacy Act 2009*
- *Human Rights Act 2019*

### Other Queensland/Federal Government Documents and Conventions

- National Principles for Child Safe Organisations
- United Nations Convention on the Rights of the Child

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## 4.0 Definitions

| Term                        | Definition                                                                                                                                                                                                                                                                                                                   |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child</b>                | A person under the age of 18.                                                                                                                                                                                                                                                                                                |
| <b>Child Safety Concern</b> | Any concern that a child is, or may be, at risk of harm.                                                                                                                                                                                                                                                                     |
| <b>Reportable Conduct</b>   | Conduct defined under the <i>Child Safe Organisations Act 2024</i> (Qld) as requiring mandatory internal notification and formal reporting to the Oversight Commissioner for Child Safe Organisations. This includes sexual misconduct, ill-treatment, neglect, psychological harm, and any conduct posing risk to children. |
| <b>Disclosure</b>           | A statement made by a child or another person indicating harm or risk of harm.                                                                                                                                                                                                                                               |
| <b>Mandatory Reporting</b>  | Legal obligation to report certain types of harm or abuse to authorities.                                                                                                                                                                                                                                                    |
| <b>Internal Report</b>      | Notification made to the Registrar or executive within FRC.                                                                                                                                                                                                                                                                  |
| <b>External Report</b>      | Notification made to police or child protection authorities.                                                                                                                                                                                                                                                                 |
| <b>Misconduct</b>           | Inappropriate behaviour that may not constitute abuse but breaches child safety expectations.                                                                                                                                                                                                                                |

## 5.0 Policy Principles

- The best interests of the child are paramount
- All child safety concerns must be acted on promptly
- Cultural safety for Aboriginal and Torres Strait Islander children is essential
- Responses are trauma informed and respectful
- Confidentiality and procedural fairness are maintained
- Reporting obligations apply regardless of role or seniority

## 6.0 Policy

### 6.1 Types of Harm

Harm includes but is not limited to:

- Psychological Abuse – intimidation, name-calling, threats, exposure to violence
- Physical Abuse – hitting, slapping, pushing, or unauthorised restraint
- Sexual Abuse – grooming, exploitation, or inappropriate contact
- Neglect – failing to provide adequate food, shelter, education, or supervision
- Grooming – manipulative behaviour intended to build trust for later abuse
- Misconduct – inappropriate contact or boundary violations

### 6.2 Unacceptable Behaviour

Any behaviour that violates the FRC's Child Safe Code of Conduct, including inappropriate physical or emotional interactions, discrimination, or failure to report suspected abuse.

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## 6.3 What to Report

You must report:

- Criminal conduct or suspected offences involving a child
- Disclosures or observations of abuse or harm
- Breaches of the Child Safe Code of Conduct
- Patterns of concerning behaviour
- Failure to protect or respond to a child at risk

## 6.4 External Reporting Obligations

Under Queensland law, all adults have a legal obligation to report known or reasonably suspected child sexual offences to police under section 229BC of the *Criminal Code Act 1899* (Qld). This duty applies to all adults, regardless of their profession or role, and is aimed at ensuring early intervention and protection of children at risk. Failure to report may result in criminal penalties, including imprisonment.

In addition to this general reporting duty, certain professionals—referred to as "mandatory reporters" are legally required to report other forms of child abuse and neglect under the *Child Protection Act 1999* (Qld). Mandatory reporters include teachers, early childhood education and care professionals, doctors, registered nurses, police officers, Registrars, and school staff. These individuals must report suspected cases of significant harm or risk of harm to the Department of Child Safety, Seniors and Disability Services.

Mandatory reports must be made as soon as practicable and are a vital mechanism for protecting vulnerable children. The failure of a mandatory reporter to fulfil this obligation can result in disciplinary action under relevant professional standards or codes of conduct.

FRC staff who are not considered mandatory reporters still have an ethical and organisational responsibility to report all concerns or suspicions relating to Child Safety in accordance with internal policies and to support the reporting process to external authorities where required.

### Who to contact:

An adult or child can make a complaint about suspected harm or abuse of a child by contacting any of these services;

- Police (emergency or known criminal offence): 000 or Policelink 131 444
- Department of Child Safety (significant harm): 1800 177 135 (24/7)
- Supervisor/Manager: for advice on reporting pathways

An adult or child, staff member or Local Commissioner can also make a complaint, allegation or concern to the FRC's Child Safe Organisation Contact Officer (Registrar). The role of the Child Safe Organisation Contact Officer within the FRC is integral to ensuring the safety and wellbeing of children, that may use FRC services. This role involves being the first point of contact for concerns or allegations related to child safety.

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Key responsibilities of the Child Safe Organisation Contact Officer include:

- **Receiving Reports:** Act as a trusted and approachable contact for individuals to report concerns, disclosures, or allegations of harm or abuse involving children.
- **Initial Assessment:** Conduct an initial assessment of the information provided to determine the appropriate course of action, ensuring the matter is handled sensitively and confidentially.
- **Referral to Authorities:** Where necessary and there is immediate harm to a child, refer matters to the relevant authorities, such as the Queensland Police Service or the Department of Child Safety, in accordance with mandatory reporting obligations and organisational policies.
- **Support and Guidance:** Provide guidance and support to individuals reporting concerns, ensuring they are informed about the process and their responsibilities.
- **Record-Keeping:** Maintain accurate and secure records of all reports, actions taken, and communications, in line with privacy and confidentiality requirements.
- **Policy Compliance:** Ensure all actions align with the organisation's child protection policies, the *Child Protection Act 1999 (Qld)*, and other relevant legislation or guidelines.
- **Collaboration:** Work collaboratively with internal and external stakeholders to address child safety concerns effectively and ensure the organisation remains compliant with child safe standards.

The Contact Officer does not replace the role of statutory authorities but acts as a critical link in identifying and escalating concerns to ensure the safety and protection of children.

## 6.5 Internal Reporting Obligations

All child safety concerns must be reported immediately to:

- The Child Safe Organisation Contact Officer

Personnel must not investigate matters themselves.

### Steps to report internally:

- Notify the Child Safe Organisation Contact Officer
- Complete the Child Safety Flow Chart (see Appendix 1)
- Record all relevant details and immediate actions
- Maintain confidentiality – do not conduct your own investigation

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## 6.6 Reports by Children, Families or Community

Children, parents, and community members can report concerns to any FRC staff member. Staff must refer these to the Child Safe Organisation Contact Officer immediately. Reports may be made:

- In person
- By phone
- In writing

### Steps for a Child to Make a Complaint:

**1. Speak to a Trusted Adult or Contact Officer**

A child can share their concern or complaint with a trusted adult within the organisation, such as a Local Commissioner, staff member, or the designated Child Safe Organisation Contact Officer. The Contact Officer is trained to listen, provide support, and take appropriate action.

**2. Use a Child-Friendly Complaint Form**

The FRC provides a simple and easy-to-understand complaint form that children can use to explain their concerns. This form can be completed with the help of a trusted adult if needed.

**3. Make a Verbal Complaint**

If a child prefers, they can make a verbal complaint by speaking directly to the Contact Officer or another trusted adult within the organisation. The adult will document the complaint and ensure it is handled appropriately.

**4. Contact the FRC Directly**

Children can contact the FRC via phone, email, or in person to lodge their complaint. The organisation ensures that communication channels are accessible and child-friendly.

**5. Anonymous Complaints**

If a child feels uncomfortable sharing their identity, they can make an anonymous complaint. The FRC will review the matter to the best of its ability while respecting the child's privacy.

## 6.7 Handling Complaints

FRC follows a trauma-informed, culturally safe process:

- Immediate risk is assessed and managed
- An incident report is completed
- Internal and external reporting steps are followed
- Support is offered to the child and others involved
- The matter is documented and reviewed

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- The matter is reported to appropriate authorities, Police and Department of Child Safety

## 6.8 Risk Management

The Registrar conducts a risk assessment after each report to identify any systemic or environmental issues that need addressing.

## 6.9 Confidentiality and Procedural Fairness

All reports and investigations are managed with confidentiality and fairness, in line with privacy legislation. Individuals subject to complaints will be afforded natural justice.

## 6.10 Queensland Reportable Conduct Scheme (commencing 1 July 2026)

Under the Child Safe Organisations Act 2024 (Qld), the FRC is a prescribed entity and is required to comply with the Queensland Reportable Conduct Scheme. The scheme requires the FRC to notify, assess, and respond to allegations of reportable conduct involving employees, contractors, volunteers, and Local Commissioners.

### Reportable conduct includes:

- Sexual offences or sexual misconduct involving a child
- Ill-treatment of a child, including physical abuse
- Neglect of a child
- Emotional or psychological harm or abuse
- Conduct that poses a significant risk to a child's safety or wellbeing
- Serious breaches of professional boundaries with a child

### Responsibilities under the scheme:

- All staff must immediately notify the Child Safe Organisation Contact Officer of any allegation, concern, or complaint that may constitute reportable conduct.
- The Child Safe Organisation Contact Officer must assess and report the matter to the Oversight Commissioner for Child Safe Organisations within seven (7) days of becoming aware of the allegation.
- The FRC must conduct an internal investigation or otherwise respond in accordance with directions of the Oversight Commissioner and any concurrent police or child protection investigation.
- The Child Safe Organisation Contact Officer will report the matter to the Police and/or the Department of Child Safety.

### Important:

- This reporting obligation applies even if the alleged conduct occurred outside the course of employment or prior to the individual's engagement with the FRC.
- Reportable conduct must still be reported even if a police or child protection investigation is already underway.
- Failure to report under the scheme may result in compliance action by the Oversight Commissioner.

For further guidance, contact the Registrar (Child Safe Organisation Contact Officer).

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## 7.0 Roles and Responsibilities

| Role                                                                              | Key Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child Safe Primary Officer (Commissioner)</b>                                  | Holds ultimate accountability for child safety governance across the FRC. Ensures organisational compliance with the <i>Child Safe Organisations Act 2024</i> (Qld), the National Principles for Child Safe Organisations, and Reportable Conduct Scheme obligations. Provides leadership, sets organisational expectations, and ensures adequate systems, resources, and culture to support child safety. Receives assurance reports from the Registrar on serious incidents, reportable conduct, and systemic risks.                                                                                                                                                                                                                                                                                                             |
| <b>Registrar (Authorised Officer and Child Safe Organisation Contact Officer)</b> | Acts as the authorised decision-maker for child safety matters. Determines whether matters meet the threshold for reportable conduct.<br>Approves and ensures external reporting to the Oversight Commissioner for Child Safe Organisations, Queensland Police Service, and Department of Child Safety.<br>Oversees investigations, ensures procedural fairness, approves risk controls, and ensures compliance with statutory timeframes.<br>Serves as the primary operational contact point for child safety concerns.<br>Receives disclosures, concerns, and complaints.<br>Conducts initial triage and risk assessment.<br>Ensures immediate safety actions are actioned where required and when a child is in immediate danger or harm.<br>Coordinates internal and external reporting pathways and maintains secure records. |
| <b>Executive Management Team</b>                                                  | Supports the Registrar in managing serious or complex child safety matters. Ensures organisational responses address systemic, workforce, and environmental risks. Endorses corrective actions and cultural improvements arising from child safety incidents.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Managers, Team Leaders &amp; Registry Coordinators</b>                         | Promote child safe practices in day-to-day operations. Ensure staff awareness and compliance with this policy. Escalate concerns immediately. Support staff involved in disclosures or reporting.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Local Commissioners</b>                                                        | Support culturally safe engagement with children, families, and communities. Uphold community accountability for child safety. Report concerns immediately and support appropriate referral pathways.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Employees, Contractors &amp; Volunteers</b>                                    | Comply with the Child Safe Code of Conduct and this policy. Identify and immediately report child safety concerns to the Child Safe Contact Officer. Participate in mandatory Child Safe Organisation training and cooperate with investigations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Human Resources</b>                                                            | Ensures child safe recruitment, induction, and ongoing training. Maintains training and screening registers. Supports disciplinary processes arising from substantiated matters.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <b>IT &amp; Information Management</b> | Ensures secure handling, storage, access controls, and confidentiality of child safety records and reports. |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------|

## 8.0 Monitoring and Review

The Child Safe Organisation Contact Officer will retain all records in regard to the complaint, however, will provide the Manager – Compliance and Legal Policy with de-identified information for statistical purposes only, where only data will be retained in the Complaints Register held by the Compliance and Legal Policy Team.

This Child Safe Reporting Policy will be reviewed every year and sooner if there is:

- there is a child-related incident;
- physical or online settings are changed;
- service activities involving children are updated or expanded.

## 9.0 Related Documents

- FRC Child Safe Code of Conduct
- FRC Child Safe Recruitment and Induction Policy
- FRC Child Safe Risk Management Plan
- FRC Child Safe Reporting Policy
- FRC External Complaints Management Policy
- FRC Internal Complaints Management Policy

## 10.0 Approval and Version Control

| Version | Amendment details | Amendment Date | Approval Date | Next Review Date |
|---------|-------------------|----------------|---------------|------------------|
| V1.0    | Initial Release   | 05/02/2026     | 05/02/2026    | 05/02/2027       |

## 11.0 Appendices (if applicable)

**Appendix 1 – Child Safety Reporting Flowchart**

**Appendix 2 – Complaint Form**

## 12.0 Contact

For further information and assistance contact:

Registrar

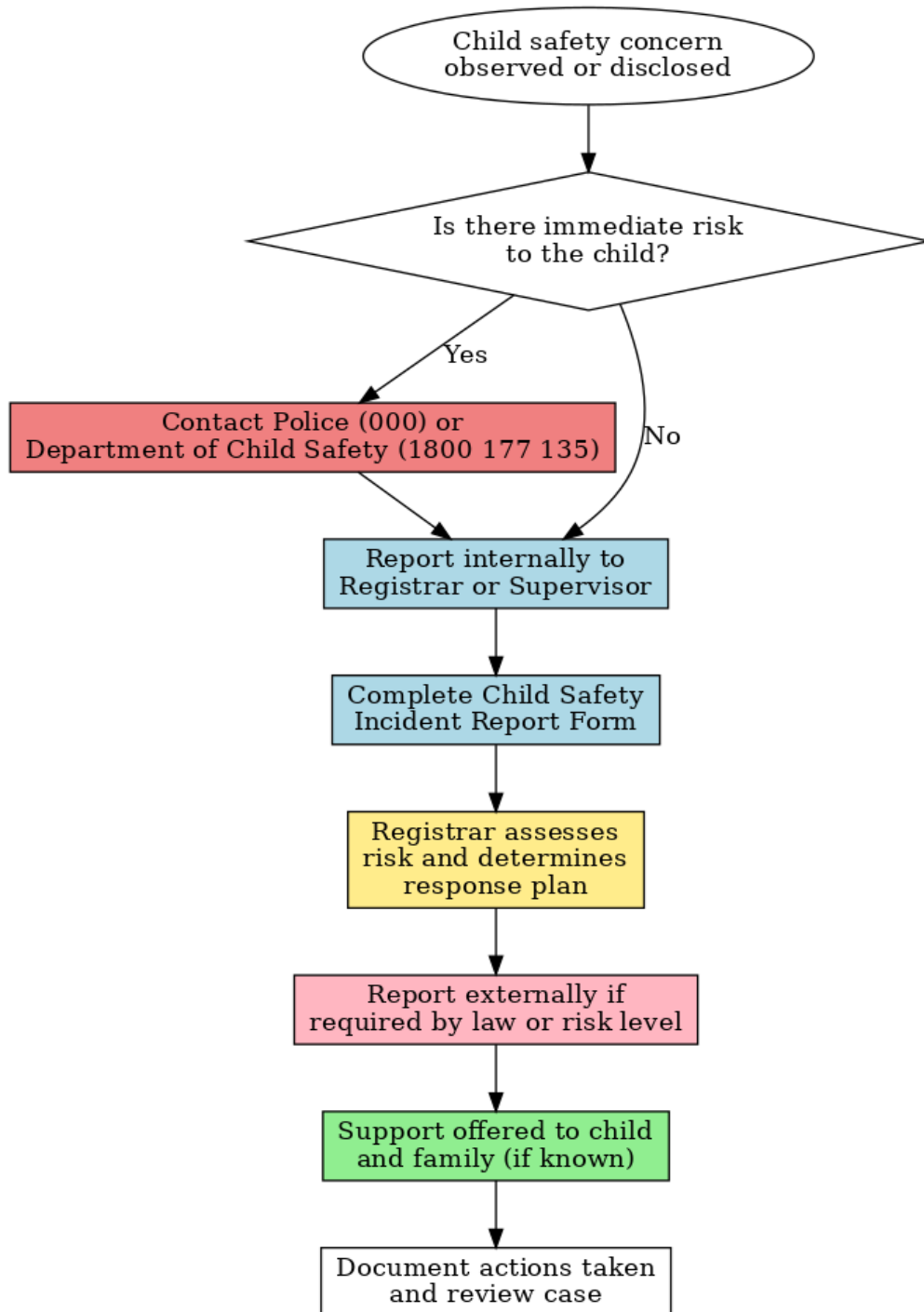
Family Responsibilities Commission

184 Mulgrave Rd, Westcourt QLD 4870

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## APPENDIX 1

### CHILD SAFE COMPLAINT FLOWCHART



## APPENDIX 2-COMPLAINT FORM

If you want to make a complaint, we will listen, treat you with kindness, and let you know how long it might take to see an outcome. If you need help filling out this form, you can ask someone you trust – like a staff member, friend, family or community Elder – to support you.

### TELL US ABOUT YOU



First name:

Last name:



Address: (optional)



Home ph: (optional)

Mobile ph: (optional)



Email: (optional)

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# TELL US ABOUT YOUR COMPLAINT



Who or what are you unhappy with? Tell us what happened.



When did it happen and has it happened before?



What would make you happy? Tell us what you would like to happen.

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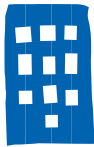
We might need to talk to you to help fix your problem. Are you okay with this?



☐ Yes ☐ No

How can we contact you? Tick one or more:

☐ Phone call ☐ Text message ☐ Email



☐ Call a person you trust (e.g. a parent, friend, neighbour or support worker)

Tell us their name and phone number:

*Please note that if you are not okay with us contacting you, we might only be able to work with the information you have given on this form.*

## What next?



**You can email this form to us or give it to a staff member you trust.**

Our email address is [complaints@frcq.org.au](mailto:complaints@frcq.org.au)

If you want someone to help you with this, you can bring a friend, an Elder, or an adult that you trust along to help you when making your complaint.

Aboriginal and/or Torres Strait Islander peoples can ask to speak to a person of their own culture. If you need an interpreter, call *Translations* on (07) 3123 4887.

*The Family Responsibilities Commission asks for your name and other details (email, phone, address) so we can deal with your complaint. The Family Responsibilities Commission is committed to protecting the privacy and confidentiality of individuals who make complaints or raise concerns about child safety. Any personal information provided as part of a complaint will be treated with the utmost care and will not be disclosed without your consent, except in circumstances where disclosure is required by law or is necessary to ensure the safety and wellbeing of a child or young person.*

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