



MHDC Reportable Conduct Policy and Procedure

Policy Overview.

Under the **Child Safe Organisations Act 2024 (Qld)**, Mununjali Housing and Development (MHDC) Company is identified as a reporting entity because;

- we provide services and facilities specifically for jarjum (children)
- and we also have the responsibility of care and supervision over them.

The Child Safe Organisations Act 2024 was introduced to enhance the safety and wellbeing of children in Queensland. The Reportable Conduct Scheme mandates that organisations must have systems in place to report, investigate, and respond to allegations of harm to jarjum involving staff and volunteers. These policies and procedures are essential for ensuring that every organisation working with children prioritises their safety and wellbeing.

Policy Statement of Commitment.

Mununjali Housing and Development Company (MHDC) is committed to preventing harm to children and ensuring all allegations of reportable conduct are handled swiftly, fairly, and transparently. We maintain an environment/s where children are safe, staff understand their boundaries, and systems for investigating misconduct meet our legal obligations under the Child Safe Organisation Act 2024 (QLD); QLD Child Protection Act (1994); our funding specifications; etc.

Scope.

- This policy applies to all workers including employees, contractors, volunteers, and board members across all sectors of the company: Housing; Jymbi Centre (Family Wellbeing; PaCE); Aged Care; and Administration/ Finance.
- The law (Child Safe Organisations Act 2024) identifies Mununjali Housing and Development Company as a single unified child safe entity. This means our Child Safe and Wellbeing Policy, and our Reportable Conduct obligations automatically extend across **all** our sectors: housing, family wellbeing, and aged care programs if adults in those programs interact with children or young people.
- The legislation applies to the entire organisation, meaning MHDC staff that work in Housing, Aged Care, Finance and Administration as well as the staff of the Jymbi Centre.
- It applies to both current allegations and historical allegations made against former workers regarding their time with MHDC.

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Core Definitions.

Reportable Allegation	Is any information, suspicion, or complaint that a worker has engaged in, or is convicted of, Reportable Conduct.
Reportable Conduct.	Under the Queensland Scheme Reportable conduct is defined as: • Child sexual offences – any criminal sexual offense committed against or in relation to a minor. • Sexual misconduct – inappropriate behavior of a sexual nature committed in relation to, or in the presence of a child, e.g. grooming, inappropriate digital messages including photographs, sexual language. • Ill-treatment – cruel, inhumane, or deeply degrading treatment of children. • Significant neglect – failure to provide a child with basic necessities (food, shelter, medical care, supervision) when in our care resulting in significant harm or risk of harm. • Physical Harm – direct or indirect may involve hitting, shaking, throwing, burning/scalding, drowning, suffocating, poisoning. etc. • Psychological Harm – manipulation, causing emotional distress, threats, constant criticism, gaslighting.
External Investigator	• MHDC will hire an external investigator in relation to an allegation of reportable conduct.
Breaches	• Under the Queensland Child Safe Legislation, breaches of the Reportable Conduct scheme include failing to notify, properly investigate, or act on allegations of child abuse by workers.

The Reportable Conduct Reporting Procedure.

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The reporting procedure consists of 4 distinct steps as specified by the Queensland Family and Child Commission.

Step 1: Immediate Safety, Action and Internal Reporting completed within 24 hours.

Step 2: Head of Organisation Assessment completed within 7 days.

Step 3: Formal Notification to Queensland Family and Child Commission (QFCC) by the Head of Organisation is to be completed within 3 days.

Step 4: Fair Investigation and Final Outcome (must be completed and provided to the Queensland Family and Child Commission (QFCC) no longer than 30 days after awareness of incident.

NOTE: Reporting procedure Timeline expectations:

- Notification and reporting are expected to occur **as soon as practicable after the head of the entity becomes aware of a reportable allegation or reportable conviction**. The process involves three stages—initial, interim, and final reports—though exact timeframes may depend on the progress of the investigation and the complexity of the matter.
- The Reportable Conduct Scheme guidance enforces timeliness to ensure child safety, with penalties (100 penalty units) for failure to comply with Reporting obligations.

Step 1. Immediate Safety, Actions, and Internal Reporting.

- **Ensure Child Safety.** Any worker who witnesses, or receives a disclosure of, reportable conduct must take immediate action to ensure the child is safe. If the child is in immediate danger, contact Triple Zero (000).
- **Contact and inform:** Contact and inform the General Manager (GM) - Brad Currie of the incident. If the GM is not available contact one of the Senior Managers, i.e. the
- Chief Financial Officer (CFO) – Colin Barthel; the Workplace Health and Training Officer (WHTO) - Shannon Bunn; and/or the Quality Assurance (QA) - Karyn Perrett.

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- **Document the matter:** The person who witnessed, or to whom the reportable incident was disclosed is to fill out and complete the Mandatory Reporting and Critical Response Reporting Form. Fill out the details and write down exactly what was seen, heard, or disclosed. Use the child's exact words where possible. As part of this initial response do not question the child further or attempt to investigate. Once completed, place the form in an envelope and deliver it to the General Manager or notified Senior Manager
- **Notify internally.** Verbally notify your Line Manager and the General Manager immediately. Incident Report to be completed within 24 hours. Once completed, place the form in an envelope and deliver it to the General Manager.
- *Exemption:* If the allegation involves the CEO, the report must be made directly to the other Senior Management Team or the Chairman of the Board.
- If the GM is the one allegedly suspected of Reportable Conduct, ensure you report to a SMT member.
- General Manager to update the MHDC Internal Reportable Conduct Internal Register (TEAMS – Mandatory Reporting Registers)
- **Refer to time-frames note.**

Step 2. Head of Organisation Assessment.

Upon receiving the report, the Head of Organisation/ General Manager must immediately:

- Assess if the conduct meets the threshold of Reportable Conduct while maintaining confidentiality and procedural fairness.
- General Manager updates the MHDC Internal Reportable Conduct Internal Register.
- **Refer to time-frames note.**

Step 3. Notification to the QFCC. As required by the Queensland Family and Child Commission:

- The Head of the Organisation/ General Manager must notify the QFCC within 3 days of becoming aware of a reportable allegation.
- The notification must include the nature of the allegation, the names of those involved (unless restricted by law), and the immediate safety and risk mitigation steps to be taken.

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- General Manager to update MHDC Internal Reportable Conduct Internal Register
- **Refer to time-frames note.**

Step 4. Investigations and Findings.

- **Procedural Fairness:** The investigation must be conducted fairly, impartially, and without undue delay. An external investigator/agency is to be contacted for advice on the proceedings of this matter. The accused worker must be informed of the allegations against them and given a reasonable opportunity to respond before any final decision is made.
- **Support:** Support of persons must be offered to both the victim/family and the worker under investigation.
- **Outcome Report:** Upon finishing the investigation, the Head of the Organisation must provide a final report to the QFCC outlining the findings, the evidence considered, and any disciplinary or structural actions taken. This report must be completed and sent to the QFCC no longer than 30 days after the alleged incident was made aware.
- Continuous Improvement – Relevant Policies and procedures are to be reviewed and actions put in place to rectify and/or improve.
- General Manager to update and complete tasks as per the MHDC Internal Reportable Conduct Internal Register
- **Refer to time-frames note.**

Conflict of Interest and Confidentiality.

- **Strict Confidentiality:** All details regarding an allegation, investigation, or notification must be kept strictly confidential. Information may only be shared with QFCC, police, regulatory bodies (like Blue Card Services), or legal advisors (Peninsula).
- **Unauthorised disclosure:** Any worker who leaks information regarding an active reportable conduct case will face immediate disciplinary action, up to termination.

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Breaches relating to the Reportable Incident Policy and Procedure.

Under Queensland's **Child Safe Organisations Act 2024**, breaches of the **Reportable Conduct Scheme**—including failing to notify, properly investigate, or act on allegations of child abuse by workers—carry severe legal, regulatory, and reputational consequences for organisations and their leadership.

Regulatory and Legal Enforcement

Regulated by the **Queensland Family and Child Commission (QFCC)**, the scheme grants authorised officers sweeping powers to monitor compliance. Breaches can result in:

- **Statutory Inquiries:** The QFCC or designated sector regulators can conduct formal investigations, interview children, and mandate the handover of records.
- **Compliance Notices:** Entities can be legally forced to rectify shortcomings or implement specific corrective policies and training.
- **Penalty Infringements:** Fines and statutory penalties can be applied to organisations (or heads of reporting entities) who fail to meet their statutory duties.
- **Accreditation and Funding Risks:** Regulators may suspend or revoke operating licenses, government funding, and service agreements if an organisation is deemed unsafe or persistently non-compliant.

Organisational and Reputational Damage.

Beyond statutory fines, the practical consequences for non-compliance are severe:

- **Loss of Public Trust:** Failure to safely manage child harm accusations results in profound reputational damage with parents, carers, and the wider community. [1]
- **Vicarious Liability:** Organisations can face costly civil litigation and damages if they are found to have breached their duty of care by failing to properly screen, train, or investigate an employee. [1]
- **Workplace Culture:** Poor handling of allegations destroys staff morale, volunteer engagement, and makes it incredibly difficult to recruit talent. [1]

Mandatory Reporting.

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It is critical to note that the Reportable Conduct Scheme operates alongside existing **Child Protection Act 1999** obligations. If a worker forms a reasonable suspicion that a child is experiencing significant harm, they remain legally bound to report this to **Child Safety** and the **Queensland Police Service**.

Version Control.

Reportable Conduct Policy and Procedure.	Date Reviewed	Date Approved by SMT	Reason for Review	Next Review due
Version # 1	22/06/2026	23/06/2026	New Policy – required by QLD Child Safe legislation	30/06/2027

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