

July 2026

Complaints involving the conduct of the Principal Commissioner Policy



QUEENSLAND
Family & Child
Commission



Queensland
Government

Complaints involving the conduct of the Principal Commissioner

1. Objective

The objective of this policy is to set out how the Queensland Family and Child Commission (the Commission) will deal with an allegation against the Commission's Principal Commissioner (PCMR) – as the defined public official under the Schedule 2 of the *Crime and Corruption Act 2001* (the CC Act) – that involves or may involve, corrupt conduct.

2. Legislative and regulatory requirements

This policy complies with and is a requirement of the *Crime and Corruption Act 2001* (the CC Act) for public administrators.

3. Principles

This policy supports the Commission to:

- Comply with section 48A of the CC Act.
- Promote public confidence in the way suspected corrupt conduct of the Principal Commissioner is dealt with.
- Promote accountability, integrity and transparency in the way the Commission deals with a complaint that is suspected to involve, or may involve, corrupt conduct by the Principal Commissioner.

3.1 What is corrupt conduct?

Corrupt conduct is defined in the CC Act as the conduct of a person (regardless of whether the person holds or held an appointment) that fulfills **all** the following elements:

1. Adversely affects, or could adversely affect, directly or indirectly, the performance of functions, or the exercise of powers of a unit of public administration or a person holding an appointment in a unit of public administration, and
2. Results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned above in a way that is not honest or impartial; or involves a breach of trust placed in a person holding an appointment, either knowingly or recklessly; or involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment, and
3. Is engaged in for the purpose of providing a benefit to the person or another person, or causing a detriment to another person, and
4. Would, if proved, be a criminal offence; or a disciplinary breach proving reasonable grounds for the terminating the person's services if the person is or were the holder of an appointment.

Without limiting the definition of **corrupt conduct** above, the CC Act provides that conduct that involves any of the following *could* be corrupt conduct:

- Abuse of public office
- Bribery, including bribery relating to an election
- Obtaining or offering a secret commission
- Fraud
- Stealing
- Forgery
- Perverting the course of justice
- An offence relating to an electoral donation
- Loss of revenue of the State
- Sedition
- Homicide
- Serious assault or assault causing bodily or grievous bodily harm
- Obtaining a financial benefit from procuring prostitution or from unlawful prostitution engaged in by another person
- Illegal drug trafficking and illegal gambling

Conduct also includes neglect, failure and inaction, conspiracy to engage in corrupt conduct, and attempt to engage in corrupt conduct.

4. Policy

4.1 Policy application

This policy applies:

- if there are grounds to suspect that a complaint may involve corrupt conduct of the Principal Commissioner; and
- to all persons who hold an appointment in, or are employees of, the Commission, including contractors, consultants and members or Boards/Councils.

4.2 Nominated person

The Chief Operating Officer (COO) is nominated under this policy and the *QFCC Complaints Management Policy* to act as the Commission's Crime and Corruption Commission (CCC) Liaison Officer. Having regard to the CC Act, this policy nominates the COO as the nominated person to notify the CCC of the complaint and to deal with the complaint under the CC Act.

4.3 Complaints about the Principal Commissioner

If a complaint may involve an allegation of corrupt conduct of the Principal Commissioner, it can be reported to:

- the Commission's CCC Liaison Officer

Email: governance@qfcc.qld.gov.au

Post:

Queensland Family and Child Commission
PO Box 15217
Brisbane City East Qld 4002

as well as anonymously or through an authorised third party.

Refer to the QFCC Website on how to submit a complaint online.

- directly to the Crime and Corruption Commission – www.ccc.qld.gov.au/corruption/report-corruption.

If there is uncertainty about whether a complaint should be reported, it is best to report it to the nominated person and they will assess it.

If the nominated person reasonably suspects the complaint may involve corrupt conduct of the Principal Commissioner, they are to:

- notify the CCC of the complaint; and
- deal with the complaint subject to the CCC's monitoring role, when:
 - directions issued under section 40 apply to the complaint, if any; or
 - pursuant to section 46, the CCC refers the complaint to the nominated person to deal with.

Commission employees and others (such as external investigators) involved in dealing with a complaint which may involve corrupt conduct must keep appropriate records of the complaint and any steps taken to deal with the complaint. This will support effective notification of complaints to the CCC and allow matters to be easily monitored and audited by the CCC.

When a person makes an allegation about the conduct of another person which would, if proved, be corrupt conduct, it may also be a public interest disclosure under the *Public Interest Disclosure Act 2010* and the discloser will be entitled to certain protections. See the *QFCC Procedure for the Management of Public Interest Disclosures*.

4.4 Resourcing the nominated person

If pursuant to the CC Act, the nominated person has responsibility to deal with the complaint:

1. The Commission will ensure that sufficient resources are available to the nominated person to enable them to deal with the complaint appropriately, and
2. The nominated person is to ensure that consultations, if any, for the purpose of securing resources are confidential and are not disclosed, other than to the CCC, without the authorisation under a law of the Commonwealth or the State
3. The nominated person must, always use their best endeavours to act independently, impartially and fairly having regard to the:
 - Purposes of the CC Act
 - The importance of promoting public confidence in the way suspected corrupt conduct in the Commission is dealt with, and
 - The Commission's statutory, policy and procedural frameworks.

If the nominated person has responsibility to deal with the complaint, they:

- Are delegated the same authority, functions and powers as the Principal Commissioner to direct and control employees as if the nominated person is the Principal Commissioner for the purpose of dealing with the complaint only.
- Are delegated the same authority, functions and powers as the Principal Commissioner to enter into contracts on behalf of the Commission for the purpose of dealing with the complaint.
- Do not have any authority, function or power that cannot – under the law of the Commonwealth or the State – be delegated by the Principal Commissioner to the nominated person.

4.5 Consultation with the CCC

The Principal Commissioner will:

- Keep the CCC informed of the contact details for the Principal Commissioner and the Commission's CCC Liaison/Nominated Person.
- Consult with the CCC when preparing any policy about how the Commission will deal with a complaint that involves, or may involve, corrupt conduct of the Principal Commissioner.

5. Delegations and other role responsibilities

Role	Responsibilities
Principal Commissioner	Consult with the CCC when preparing any policy about how the Commission will deal with a complaint that involves or may involve corrupt conduct of the Principal Commissioner
Chief Operating Officer	Receive and deal with any complaint involving the Principal Commissioner that involves or may involve corrupt conduct in accordance with advice and/or directions from the CCC
All other staff	Refer any complaint about the Principal Commissioner that involves or may involve corrupt conduct to the Nominated Person

6. Considerations

6.1. Consideration of Human and Child Rights

The *QFCC Complaints Management Framework* includes considerations of human and child rights in the receiving and handling of complaints.

6.2. Consideration of the Child Safe Standards and Universal Principle

The *QFCC Complaints Management Framework* includes considerations of the Child Safe Standards and Universal Principle in the receiving and handling of complaints.

6.3. Consideration of Reframing the Relationship commitments

The *QFCC Complaints Management Framework* includes considerations of Reframing the Relationship commitments in the receiving and handling of complaints.

6.4. Consideration of risk management

The *QFCC Risk Management Framework* includes considerations related to employee conduct, harm to others and the Commission and reputation to State.

6.5. Consideration of privacy

The *QFCC Complaints Management Framework* includes considerations of privacy in the application of receiving and handling complaints.

7. Supporting documents

Authority	Name
Legislation, Standards or Framework	<i>Crime and Corruption Act 2001</i>
	<i>QFCC Complaints Management Framework</i>
	<i>QFCC Risk Management Framework</i>
Policies and Procedures	<i>QFCC Complaints Management Policy</i>
	<i>QFCC Managing Public Interest Disclosures Policy</i>
Forms, templates and other supporting documents	<i>QFCC Complaints Management Framework On-a-Page</i>
	Complaint Form

8. Definitions

Term	Definition
Complaint	Includes information or matter. See definition provided by section 48A (4) of the CC Act
Corruption	See Schedule 2 of the CC Act
Corrupt conduct	Refer section 3.1 of this policy and Section 15 of the CC Act
Deal with	To deal with a complaint involving corruption, is defined under the CC Act to include: • investigate the complaint, information or matter • gather evidence for prosecutions for offences or disciplinary proceedings • refer the complaint, information or matter to an appropriate authority to start a prosecution or disciplinary proceeding • start a disciplinary proceeding • take other action, including managerial action, to address the complaint in an appropriate way.
Unit of Public Administration (UPA)	See Section 20 of the CC Act. The QFCC is a UPA

9. Document control

Document type	Policy
Responsible Officer	Chief Operating Officer
Content Manager references	PDF version: D26/5124
	Word version: D26/5123
	Record of approval: TF26/573
Information security classification	Official Public
Document review	This policy is to be reviewed every two years or following changes to the <i>QFCC Complaints Management Framework or Policy</i> , or legislated changes to the CC Act

9.1 Version control

Version	Date	Description of revisions	Author
1.0	Aug 2018	Initial version	Senior Advisor Legal and Ethics
1.2	Nov 2019	Adapted to current QFCC style guide; staff positions updated	Senior Advisor Legal and Ethics
1.3	June 2021	Annual review	Principal Advisor Human Resources
1.4	May 2023	Adapted to current QFCC branding; staff positions updated	
2.0	May 2026	New QFCC Template	Manager Transformation, Governance & Change
		Amend to reflect updated Complaints Management Policy and new Complaints Management Framework Amend to reflect changes to role titles and Nominated Person	

10. Approval

This policy is subject to the approval by the Chief Operating Officer as the accountable officer.

Libby Doney

A/Chief Operating Officer

Queensland Family and Child Commission

1 August 2026

