

Public Interest Disclosure Management Program

Management program for Public Interest Disclosures made under the Public Interest Disclosure Act 2010

1 Introduction

This Public Interest Disclosure Management Program has been developed by the Department of Communities Housing and Digital Economy (the department) in accordance with section 28 of the Public Interest Disclosure Act 2010 (the PID Act) and Public Interest Disclosure Standard 1/2019 – Public Interest Disclosure Management Program.

The Director-General has overall responsibility for ensuring that the department develops, implements and maintains a Public Interest Disclosure (PID) Management Program. The department's PID Management Program encompasses:

- commitment to encouraging the internal reporting of wrongdoing
- senior management endorsement of the value to the department of PIDs and the proper management of PIDs
- a communication strategy to raise awareness among employees about PIDs and the department's Public Interest Disclosure Policy and Public Interest Disclosure Procedure
- a training strategy to give employees access to training about how to make a PID, information on the support available to a discloser, and advice on how PIDs will be managed
- specialist training and awareness about PIDs for senior management and other staff who may receive or manage PIDs, disclosers or workplace issues relating to PIDs
- the appointment of an officer to be responsible for issues related to the management of PIDs
- ensuring effective systems and procedures are in place so that issues and outcomes from PIDs inform improvements to service delivery, business processes and internal controls
- regular review and evaluation of the effectiveness of the PID Management Program.

2 Purpose

Standard 1.3: Management program for PIDs, in Public Interest Disclosure Standard 1/2019 – Public Interest Disclosure Management Program, states that the management program must meet the following minimum requirements:

- 1.3.1 Demonstrate organisational commitment
- 1.3.2 Appoint a PID Coordinator
- 1.3.3 Delegate PID responsibilities
- 1.3.4 Implement a communication strategy
- 1.3.5 Implement a training strategy
- 1.3.6 Analyse PIDs to inform improvements

This PID Management Program has been developed to comply with Standard 1.3: Management program for PIDs.

3 Demonstrate organisational commitment

The Director-General and Board of Management (BoM):

- recognise the important role disclosers play in identifying wrongdoing, thereby improving the integrity and performance of the department and deterring wrongdoing
- are committed to ensuring that PIDs are properly assessed, investigated and dealt with
- recognise the value and importance of providing protection to employees who report wrongdoing using appropriate internal or external channels
- are committed to ensuring that appropriate consideration is given to the interests of persons who are the subject of a PID
- commit to ensuring that sufficient resources are allocated to managing the department's PID Management Program.

This PID Management Program supports the department's organisational commitment to ethical practices, which is explicitly stated in the department's Integrity Framework and Code of Conduct for the Queensland Public Service (Code). Disclosing wrongdoing is in accordance with the department's ethical culture, in particular, acting with integrity.

The department encourages any employee who considers that they have observed or identified wrongdoing to make a disclosure.

The department will take all reasonable steps to protect an employee from any detrimental action or reprisal taken because they have made a PID. When employees come forward with information about wrongdoing, managers commit to:

- protecting the dignity, wellbeing, career interests and good name of all persons involved
- protecting the discloser from any adverse action taken as a result of making the disclosure
- responding to the disclosure thoroughly and impartially
- taking appropriate action to deal with wrongdoing, and any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure
- keeping the discloser informed of progress and the outcome.

The department also recognises that members of the public may have information about the operations of the department that meets the criteria for a PID. Members of the public are encouraged to report this information to the department's Integrity Services Unit. A PID made by a member of the public will be managed in accordance with the department's Public Interest Disclosure Policy and Public Interest Disclosure Procedure.

4 Appoint a PID Coordinator

The department has appointed the Director, Integrity Services Unit as the department's PID Coordinator, with responsibility for the PID Management Program.

The role of the PID Coordinator is set out in the department's Public Interest Disclosure Policy and Public Interest Disclosure Procedure and this PID Management Program.

The PID Coordinator has direct access to the Director-General in relation to PID matters, appropriate delegated authority and access to the necessary resources to ensure that the department complies with its statutory obligations under the PID Act.

5 Delegate PID responsibilities

The PID Coordinator is responsible for ensuring that:

- all officers who directly or indirectly supervise or manage other officers are informed that they are a person who may receive a PID in accordance with section 17(3)(d) of the PID Act
- all officers who have the function of receiving or taking action on the type of information that may be disclosed in a PID are informed that they are a person who may receive a PID in accordance with section 17(3)(e) of the PID Act
- all officers with designated responsibility for receiving, assessing, investigating and/or decision-making in relation to PIDs are provided with written guidance on the performance of these tasks and appropriate delegated authority

- all officers nominated to undertake the role of a PID Support Officer are provided with written guidance on the performance of this role, including information about support services available to assist disclosers within the entity and externally.

6 Implement a communication strategy

The department recognises that critical to the success of its PID Management Program is employee awareness of this PID Management Program and the department's Public Interest Disclosure Policy and Public Interest Disclosure Procedure.

The department's communication strategy involves the following:

- all new employees are advised of PIDs at induction including a clear explanation of how to make a PID
- information about PIDs is included on the department's intranet, including contact details for the PID Coordinator. Links are provided to the department's Public Interest Disclosure Policy and Public Interest Disclosure Procedure and this PID Management Program
- messages from the Director-General or Deputy Director-General, Strategy and Corporate Services that reconfirm the department's commitment to the PID Act, as well as other information and reminders about the department's PID reporting system are included periodically in the department's internal communications
- information about making a PID, as well as the department's Public Interest Disclosure Policy, Public Interest Disclosure Procedure and this PID Management Program are provided on the department's public website.

7 Implement a training strategy

The department recognises the importance of providing training to employees on PID issues and ensuring that ongoing training is provided. The department's training strategy involves the following:

- all employees are provided with information about the reporting of wrongdoing and the operation of the PID Act in conjunction with mandatory Public Sector Ethics or Code of Conduct training provided to all employees as part of staff induction and annual staff training
- members of the BoM, divisional heads, supervisors and any officers who:
 - have designated responsibility for receiving, assessing, investigating and/or decision making in relation to PIDs; or
 - may be called upon to act as PID Support Officers are provided the opportunity to attend comprehensive PID training by the PID Team of the Office of the Queensland Ombudsman, including Module 1: Assessment and Management Module 2: Risk Assessment and Protection Module 3: Support. A record of their attendance will be maintained on the department's Learning Management System
- The PID Coordinator will complete the full PID training course offered by the Office of the Queensland Ombudsman.

8 Analyse PIDs to inform improvements

The department acknowledges the value of information obtained from PIDs in identifying systemic issues and trends and informing administrative improvements.

Following the finalisation of a PID made about the department or an officer of the department, the PID Coordinator will assess whether any change is needed to the department's service delivery, personnel management, business processes or internal controls.

The PID Coordinator will conduct an annual review of the effectiveness of the department's PID Management Program and provide a report to the Director-General and BoM.

9 Approval

The PID management program was approved by the Director-General on 8 November 2022.