

Public Interest Disclosure Management Program 2020

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 Office of the Queensland Ombudsman (the Office) in accordance with s.28 of the *Public Interest Disclosure Act 2010* (the PID Act) and [Public Interest Disclosure Standard 1/2019 – Public Interest Disclosure Management Program](#).

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

- commitment to encouraging the internal reporting of wrongdoing
- senior management endorsement of the value to the Office of PIDs and the proper management of PIDs
- a communication strategy to raise awareness among employees about PIDs and the Office's PID 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 of the Public Interest Disclosure Procedure and evaluation of the effectiveness of the PID Management Program.

This PID Management Program should be read in conjunction with the Office's [Public Interest Disclosure Procedure 2020 \(PDF 1.3MB\)](#).

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 Ombudsman and Ombudsman Management Group (OMG):

- recognise the important role disclosers play in identifying wrongdoing, thereby improving the integrity and performance of the Office 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 Office's PID Management Program.

The Office's organisational commitment to ethical practices is explicitly stated in the Office's [Code of Conduct](#). Disclosing wrongdoing is in accordance with the Office's ethical culture, in particular, acting with integrity.

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

The Office 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
- dealing with any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure as a breach of the Office's disciplinary procedures
- responding to the disclosure thoroughly and impartially
- taking appropriate action to deal with wrongdoing
- keeping the discloser informed of progress and the outcome.

The Office also recognises that members of the public may have information about the operations of the Office that meets the criteria for a PID. Members of the public are encouraged to report this information to the Deputy Ombudsman. A PID made by a member of the public will be managed in accordance with the Office's Public Interest Disclosure Procedure 2020.

4. Appoint a PID Coordinator

The Ombudsman has appointed the Deputy Ombudsman as the Office's PID Coordinator, with responsibility for the PID Management Program.

The role of the PID Coordinator is set out in the Office's Public Interest Disclosure Procedure 2020 and this PID Management Program.

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

The PID Coordinator will provide regular reports on the implementation and oversight of the PID Management Program to the Ombudsman.

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 Office recognises that critical to the success of its PID Management Program is employee awareness of this program and the Office's Public Interest Disclosure Procedure 2020.

The Office's communication strategy involves the following:

- all new employees are advised of the Office's Public Interest Disclosure Procedure and PID Management Program at induction
- information about PIDs is included on the Office's intranet, including contact details for the PID Coordinator. Links are provided to the Public Interest Disclosure Procedure and this PID Management Program, as well as to PID information on the Office's public website. The information is regularly reviewed and updated to ensure it is complete and up-to-date.
- messages from the Ombudsman that reconfirm the Office's commitment to the PID Act, as well as other information and reminders about the Office's PID reporting system are included periodically in the Office's internal electronic newsletter
- information about making a PID, as well as the Public Interest Disclosure Procedure and this PID Management Program are provided on the Office's public website
- messages about the PID Act and the Office's responsibilities in relation to PIDs are included periodically in the Office's external electronic newsletters.

7. Implement a training strategy

The Office recognises the importance of providing training to employees on PID issues and ensuring that ongoing training is provided.

The Office's training strategy involves the following:

- all new employees are scheduled to attend the Office's PID Awareness Training course as soon as practicable after commencement. A record of their attendance will be maintained by the Corporate Services Unit.
- a segment on the operation of the PID Act is included as part of the mandatory Code of Conduct training provided to employees
- members of the OMG and managers are provided the opportunity to attend comprehensive PID training presented by the PID Team of the Office, including:

- Module 1: Assessment and Management
 - Module 2: Risk Assessment and Protection
 - Module 3: Support
- officers who may be called upon to act as PID Support Officers are provided the opportunity to attend comprehensive PID training presented by the PID Team of the Office, including Module 3: Support.

8. Analyse PIDs to inform improvements

The Office 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 Office or an officer of the Office, the PID Coordinator will assess whether any change is needed to the Office's service delivery, personnel management, business processes or internal controls. The PID Coordinator will report to the Ombudsman quarterly regarding any recommendation for changes as a result of that assessment.

The PID Coordinator will conduct an annual review of the effectiveness of the Office's PID Management Program and provide a report to the Ombudsman.

Approved by:

Phil Clarke, Queensland Ombudsman

19 June 2020