

Public Interest Disclosure Management Program 2019

Management of public interest disclosures made under the *Public Interest Disclosure Act 2010*

Introduction

This management program has been prepared to comply with section 28 of the *Public Interest Disclosure Act 2010* (the **PID Act**) and Public Interest Disclosure Standard No.1/2019 (the **standard**) issued by the Queensland Ombudsman under section 60 of the PID Act.

The Chief Human Resources Officer has overall responsibility for ensuring that Queensland Treasury (**Treasury**) develops, implements and maintains a Public Interest Disclosure (PID) Management Program. Treasury's PID Management Program encompasses:

- commitment to encouraging the internal reporting of wrongdoing
- senior management endorsement of the value to Treasury of PIDs and the proper management of PIDs
- a communication strategy to raise awareness among employees about PIDs and the Treasury'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.

Under the PID Act, Public Interest Disclosures (**PIDs**) may be made by employees of a public sector entity and by members of the public*. This PID Management Program (**program**) should be read in conjunction with Treasury's PID Procedure 2019.

Purpose

Standard 1.3 requires Treasury to develop, implement and maintain a management program for PIDs about the conduct of Treasury employees that addresses the following issues:

1. Demonstrate Organisational Commitment

Treasury and senior managers of the business:

- recognise the important role disclosers play in identifying wrongdoing and thus improving the integrity and performance of Treasury and the Public Service and deterring wrongdoing

* This excludes any persons working for government-owned corporations (GOCs). GOCs will need to contact the PID Coordinator as the procedure will differ.

- 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 people who are the subject of a PID
- commit to ensuring that sufficient resources are allocated to managing Treasury's PID Management Program.

This procedure has been prepared to honour Treasury's commitment to a strong ethical culture and ethical practices which are explicitly stated in the Code of Conduct for the Queensland Public Service (the code), in particular, acting with integrity. These practices, as well as the Standard, underpin and support the key elements of the program.

Treasury will manage PIDs and support disclosers in accordance with the PID Act. Treasury will take all reasonable steps to protect an employee from any detrimental action by way of a reprisal taken because they have made a PID. When an employee comes 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 because of making the disclosure
- dealing with any bullying, harassment, unfair treatment, victimisation or discrimination that results from a disclosure as a breach of Treasury'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.

Treasury also recognises that members of the public may have information about the operations of Treasury that meets the criteria for a PID. Members of the public are encouraged to report this information to the PID Coordinator. A PID made by a member of the public will be managed in accordance with Treasury's PID Procedure 2019.

3. Appoint a PID coordinator

Treasury has identified the Principal Employee Relations Officer as the PID coordinator who is responsible for issues related to the management of PIDs.

The Principal Employee Relations Officer has:

- direct access to the CHRO in relation to PID matters
- delegated authority to appropriately manage PIDs
- access to resources to allow for the proper management of PIDs.

The PID Coordinator will provide regular reports on the implementation and oversight of the PID management program to the CHRO.

A member of public or an employee of Treasury may make a disclosure to the PID coordinator by way of:

Email: PIDCoordinator@treasury.qld.gov.au

Letter:

Attn: PID Coordinator
Queensland Treasury
GPO Box 611
Brisbane Qld 4001

Phone: 3035 3536 (and ask to speak to the Principal Employee Relations Officer in their role as PID Coordinator)

4. Delegate PID responsibilities

The PID coordinator is responsible for ensuring that:

- employees who directly or indirectly supervise or manage other employees are informed that they are a person who may receive a PID in accordance with section 17(3)(d) of the PID Act
- all employees 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
- employees 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
- employees nominated to undertake the role of a PID Support Officer are provided with guidance on the performance of this role, including information about support services available to assist disclosers within the entity and externally.

5. Implement a communication strategy

Treasury recognises that critical to the success of the program is the awareness of this program and procedure.

Treasury's communication strategy involves the following:

- provide all new Treasury employees with information about the Program and Procedure at induction
- making available PID information, including the Program and Procedure, on Treasury's intranet and internet sites
- communicate regularly with all employees to raise their awareness about PIDs and Treasury's Program and Procedure, including:
 - Communication of information that target specific needs of Treasury employees who directly or indirectly supervise or manage other employees.
 - Periodically publish Nexus articles that reconfirm Treasury's commitment to the PID Act, as well as other information and reminders about PID reporting.
 - Email blasts from HR Business Partners to their respective business areas, notifying managers and employees of Treasury's PID Management Program
- providing contact details for Treasury's nominated PID Coordinator in Treasury's contacts on Nexus
- regular training for employees in conjunction with the Code and Ethical Decision Making.
- update any necessary information on Nexus regarding Treasury's PID Procedure and Management Program
- develop a screen saver with IT to display short facts about a PID to increase awareness
- provide written guidance to the PID Coordinator, PID support officers and those delegated to receive, assess, investigate and/or make a decision on PIDs

6. A training strategy for employees

Queensland Treasury recognises the importance of educating employees on PID issues and ensuring that ongoing training is provided.

As part of regular, ongoing training in ethical behaviour and the code employees will be educated on elements of the PID Act and relevant schedules which will include but is not limited to:

- how to identify wrongdoing
- how to make a PID
- the support and protection to be afforded to the discloser
- how PIDs will be managed by Treasury.

In addition, senior managers of Treasury will receive training on their obligations in relation to handling PIDs.

Employees who undertake the Managers' Development Program (MDP) will learn the basics of a PID as part of their training and development program.

PID 'lite' training will be introduced to the HR Business Partners and Chief Human Resources Officer to increase their awareness of PIDs, how to assess a PID and how to provide support throughout the PID process. This training will be organised through the Queensland Ombudsman.

Treasury's PID Coordinator will complete a full PID training course, offered by the Queensland Ombudsman.

7. Analyse PIDs to inform improvements

Treasury 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 Treasury or an employee, the PID Coordinator will assess whether any change is needed to the Treasury'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 Treasury's PID Management Program and provide a report to the Ombudsman.

Document owner	Human Resources Branch
Original plan approved by	Cecelia Christensen Acting Executive General Manager
Date plan approved	
Date to be reviewed	