Public Interest Disclosure Management Framework

Organisational Commitment

The Department of State Development and Infrastructure (the department) is committed to supporting and encouraging people to report wrongdoing. Internal reporting is one of the principal ways wrongdoing is detected and investigated. The department will ensure that any public interest disclosures (PIDs) are managed in accordance with the <u>Public Interest Disclosure Act 2010</u> (PID Act) and that anyone who reports such matters is supported and protected from reprisal or adverse outcomes. Employees who raise matters can be confident their courage and diligence in upholding the Queensland Government's ethical standards is valued and appreciated by the department and by the people of Queensland.

2. Background

Section 28(1)(d) of the PID Act and <u>Public Interest Disclosure Standard No. 1/2019</u> (the standard) require the Director-General of the department to develop, implement and maintain a <u>Public Interest Disclosure (PID)</u> <u>Management Program</u> (the program). This document outlines the program and meets the requirements set out in the <u>Public Interest Disclosure Standards</u> (PID standards) issued by the <u>Queensland Ombudsman</u>.

Further information about PIDs, including PID definitions, is available on the department's website.

3. PID Coordination

The Executive Director, People and Performance is the department's PID Coordinator. The PID Coordinator is responsible for overall management of the program.

The PID Coordinator is supported by the department's Integrity & Workplace Relations (IWR) team to manage the following responsibilities:

- » PID assessment and reprisal risk assessment
- » Case management
- » Workplace investigations
- » Ensuring support is provided to those involved in PIDs (disclosure, witnesses, managers, subject officers and decision-making delegates).
- » Record keeping and reporting.

4. Delegations

Delegations are to be exercised in accordance with the department's Delegation Schedules. Delegation Schedules are reviewed on a regular basis to ensure they remain current and relevant to the operational needs of the department. It is recommended that delegate authority levels are confirmed prior to exercising any powers in relation to this policy and supporting procedures.

5. Communication, awareness and training strategies

Employees are provided with information about PIDs through a range of corporate messaging and awareness raising actions and training. These include:

- » Director-General or Executive Leadership Team emails
- » business area emails



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- » intranet messages
- » mandatory online training.

Training on PIDs includes (but not limited to):

- » general information provided to employees during corporate induction on PIDs
- » mandatory online training for all employees on commencement and at yearly intervals including:
 - Ethical Decision Making and the Code of Conduct training
 - two PID awareness training courses a general course for all staff and a supplementary course for managers and supervisors.
- » references incorporated into fraud and corruption prevention training
- » awareness sessions conducted by the IWR team with targeted business areas as required
- » guidance by IWR to managers and relevant employees when managing complex people matters
- » the PID Coordinator and employees responsible for the provision of PID services undertake training provided by the Queensland Ombudsman's Office.

This document and the <u>PID procedure</u> are published on the department's website as well as on the intranet for internal employees.

6. Business improvement focus

All PIDs are reviewed individually and systemically to determine if there are opportunities for improving business systems, policies, practices and employee performance and decision-making. PID data, along with other ethics case and complaints data, is used to assess fraud and corruption risks and to inform the department's fraud and corruption prevention plan.

The Executive Director, People and Performance reports regularly to the Deputy Director-General, Corporate, bimonthly to the People and Culture Committee, and the Audit and Risk Management Committee biannually on trends and issues.

7. Oversight of the program

The PID Coordinator is responsible for overseeing the program on behalf of the Director-General who is the accountable officer under the PID Act.

The Executive Director, People and Performance provides oversight regarding PID assessment, PID case management and the quality of support offered to persons involved in PIDs and decisions affecting their employment.

The Deputy Director-General, Corporate is responsible for approving the program and is an additional point of oversight regarding PID assessment and PID case management including provision of support and protection from reprisal.

This oversight ensures consistency and fairness in decision-making and a check on compliance with legislative requirements, in particular, those under the PID Act and the <u>Crime and Corruption Act 2001</u>.

The program is subject to ongoing and regular review through the following processes:

- » regular reporting to management and departmental governance committees as outlined above
- » compliance and performance audits as part of annual operational audits by Internal Audit
- » reviews undertaken by the Queensland Ombudsman's Office
 - oversight, audits and monitoring of PIDs involving corrupt conduct by the <u>Crime and Corruption Commission</u> pursuant to section 48 of the *Crime and Corruption Act 2001*.

8. Human rights compatibility

The department is committed to respecting, protecting and promoting human rights.

Under the Human Rights Act 2019 (HR Act), the department has an obligation to act and make decisions in a way that is compatible with human rights and, when making a decision, to give proper consideration to human rights.

When making a decision about PID management, decision-makers must comply with this obligation.

For further information on the HR Act see:

https://dsdipq.sharepoint.com/sites/connect/business-support/ethical-business/SitePages/Human-rightsact-2019.aspx

Definitions 9

Refer to **Appendix A** for definitions of key terms referred to in this framework.

10. Related documents, forms and templates

- Complaints about the Director-General Coordinator-General procedure
- Complaints management policy
- Public Interest Disclosure procedure
- Reporting corrupt conduct procedure.

11. References

PID internet resources

12. Further information

For further information or clarification, please contact:

- your manager or supervisor
- your business support officer
- Integrity and Workplace Relations ethics@dsdilgp.gld.gov.au

13. Storage of information

All information should be managed in accordance with the Public Records Act 2002, and the whole-of-Government Records Governance policy. In addition, personal information should be managed in accordance with the Information Privacy Act 2009.



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14. Document control

Document owner		Director, Integrity and Workplace Relations			
Contact details Next review (annually)		ethics@dsdilgp.qld.gov.au			
		November, 2024			
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Version	Issue Date	Reason	Author	Approver	
1.0	20/10/2020	New program	Senior Complaints Officer	Deputy Director-General, Corporate	
2.0	20/07/2021	Incorporate MoG changes and updates following PID self-audit process in 2020	Principle Project Officer, Ethics, Compliance and Risk	Executive Director, Corporate Services	
2.1	24/11/2023	Annual Review (light review only to update references)	Principal Advisor, Workplace Relations	Executive Director, People and Performance	
2.2	05/03/2024	Machinery of Government department name change only	Senior Governance Officer, Corporate Governance, People and Performance	Director, Integrity & Workplace Relations, People and Performance	



Appendix A: Definitions

The key terms and definitions referred to in this framework are as follows:

Term	Definition	
Delegate	» The person authorised to perform a specific task or function on the Director- General or Minister's behalf. Delegations and authorisations are recorded in the department's delegation schedules.	



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