



# Public Interest Disclosure Management Program

**Supporting and enhancing ethical conduct to aid the reporting of wrongdoing**



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An electronic copy of this report is available on the Department of Local Government, Racing and Multicultural Affairs' website at [www.dlgrma.qld.gov.au](http://www.dlgrma.qld.gov.au).



## Our commitment to those who report wrongdoing

The Department of Local Government, Racing and Multicultural Affairs (the department) is committed to supporting and encouraging people to report wrongdoing. Internal reporting is one of the major ways wrongdoing is detected and investigated. The department will ensure 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.

## Background

Section 28 (1)(d) of the Public Interest Disclosure Act 2010 (PID Act) and PID Standard No. 1/2019 (the standard) require the Director-General of the department to develop, implement and maintain a public interest disclosure (PID) Management Program (the program). This document outlines the program and meets the requirements set out the standard.

Further information about PIDs, including PID definitions, are available in the department's PID procedure.

## PID coordination

The Department of State Development, Manufacturing, Infrastructure and Planning (DSDMIP) provide ethics services and programs to the department under a service level agreement.

DSDMIP's Director, Ethics is the department's PID Coordinator. The PID Coordinator is responsible for overall management of the program. Monthly and as needed on a case by case basis, the PID Coordinator meets in person with the Director-General to discuss PID management. The PID Coordinator's duties are outlined in several corporate documents and integrity policies and procedures:

- Complaints about the Director-General
- Complaints management policy
- Ethics and integrity framework
- Fraud and corruption prevention plan
- PID procedure
- Reporting corrupt conduct procedure.

The PID Coordinator is supported by the department's People and Culture Team, the Executive Director, Corporate and under the service level agreement the DSDMIP Ethics team. Responsibilities include managing PIDs, PID assessment and reprisal risk assessment, record keeping and reporting, case management, workplace investigations, and support those involved in PIDs (disclosure, witnesses, managers, subject officers and decision-making delegates).



## Delegations

All departmental supervisors and managers are authorised to receive a PID in accordance with section 17 (3)(e) of the PID Act and the department's PID procedure. Ethics team members are also authorised to receive, manage, and provide support to disclosers and others involved in a PID. These team members receive specialised training from the Queensland Ombudsman's Office and have specific duties outlined in unit operating procedures to assist in the management of PIDs.

The department's HR delegations provide authority to the following roles to receive, assess and take action in regard to a PID:

- Director-General
- Deputy Director-General
- Executive Director
- Executive Director, Corporate
- Director, Human Resources (title changed to Director, People & Culture from 18/11/19)
- Director, Ethics (DSDMIP).

When the PID is concerning the Director-General, the Complaints about the Director-General procedure applies, and the delegation in these matters does not include these public officials. The delegation is conditional and requires mandatory consultation with the Director, Ethics as the delegated PID Coordinator.

## Communication, awareness and training strategies

Employees are provided with information about PIDs through a range of corporate messaging and awareness raising actions and through general and specific training.

Communication and awareness raising actions include;

- Intranet messages
- Director-General emails
- Business area emails
- Mandatory training

Training on PIDs includes the following:

General information provided to employees on PIDs including how to lodge them by Ethics team during corporate induction.

Mandatory online Code of Conduct training which is completed by all employees on commencement and at yearly intervals.

- All employees will undertake a specialised mandatory annual online PID module from 2019-20.
- Face-to-face awareness and training sessions are conducted by the Ethics team with targeted business areas as required.
- PID training is also undertaken during training for managers and relevant employees during managing complex people matters and fraud and corruption prevention training. The PID



Coordinator and employees in the Ethics team undertake training provided by the Queensland Ombudsman's Office.

The department's Complaint management policy, this PID Program document and the PID procedure are published on the department's external facing website as well as on the intranet for internal employees. Regular emails and other awareness raising about PIDs is carried out by the Ethics team.

## Business improvement focus

In line with the department's Complaints management policy and its learning culture, 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 complaint data, is used to assess fraud and corruption risks and to inform the department's fraud and corruption prevention plan.

The Director, Ethics DSDMIP under the service level agreement reports to the Audit and Risk management committee biannually and liaises with the Executive Director, Corporate on PID issues as required.

## Oversight of the program

The program is outlined in this document which is made available to employees and members of the community via the departmental intranet and internet websites. The program was approved by the Deputy Director-General on 19/11/2019 as recorded in DEPBN19/863 in the department's records management system.

The PID Coordinator is responsible for overseeing the program on behalf of the Director-General who is the accountable officer under the PID Act. PID assessments are overseen by the Director People and Culture and the Executive Director, Corporate. 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 *Crime and Corruption Act 2001*. The Executive Director, Corporate 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 program is subject to ongoing and regular review through the following processes:

- regular reporting to management and departmental governance committees as outlined in section 6 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 Crime and Corruption Commission pursuant to section 48 of the *Crime and Corruption Act 2001*.

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