

# PUBLIC INTEREST DISCLOSURE MANAGEMENT PROGRAM

## DOCUMENT CONTROL

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## CONTEXT

1. The *Public Interest Disclosure Act 2010* (PID Act) protects a person who makes a Public Interest Disclosure (PID), formerly known as a whistleblower.
2. The PID Act requires the Chief Executive to establish procedures to deal with PIDs and requires QPAC to comply with standards made by the Ombudsman.
3. *Public Interest Disclosure Standard No. 1 / 2019 – Public Interest Disclosure Management Program* prescribes the organisational systems and procedures QPAC must establish in order to give effect to the requirement under section 28(1)(d) of the PID Act to ensure there is a management program for PIDs.
4. This PID Program should be read in conjunction with QPAC's PID Procedure.
5. Neither this PID Program nor any part of its contents forms part of any person's contract of employment or engagement or creates, or forms part of, any contract between any other party to whom this PID Program applies and QPAC.
6. QPAC may, in its absolute discretion, amend this PID Program at any time.

## PURPOSE

7. This PID Program has been developed to:
  - (a) demonstrate organisational commitment to management of PIDs;
  - (b) appoint PID Coordinators;
  - (c) delegate PID responsibilities;
  - (d) implement a PID communication strategy;
  - (e) implement a training strategy; and
  - (f) analyse PIDs to inform improvements.

## PROGRAM

### **Demonstrate organisational commitment**

8. The Board and the Executive Team:
  - (a) recognise the important role Disclosers play in identifying Wrongdoing, thereby improving QPAC's integrity and performance and deterring Wrongdoing;
  - (b) are committed to ensuring that PIDs are properly assessed, investigated and dealt with;
  - (c) recognise the value and importance of providing protection to Employees who report Wrongdoing using appropriate internal or external channels;
  - (d) are committed to ensuring that appropriate consideration is given to the interests of Subjects; and
  - (e) are committed to ensuring that sufficient resources are allocated to managing QPAC's PID Program.

9. QPAC's organisational commitment to ethical practices is explicitly stated in its Code of Conduct. Disclosing Wrongdoing is in accordance with QPAC's ethical culture, in particular, acting with integrity.
10. QPAC encourages any Employee who considers that they have observed or identified Wrongdoing to make a PID.
11. QPAC will take all reasonable steps to protect an Employee from any detrimental action or Reprisal taken because they have made a PID.
12. When Employees come forward with information about Wrongdoing, Managers commit to:
  - (a) protecting the dignity, wellbeing, career interests and good name of all persons involved;
  - (b) protecting the Discloser from any adverse action taken as a result of making the PID;
  - (c) dealing with any bullying, harassment, unfair treatment, victimisation or discrimination that results from a PID under QPAC's disciplinary procedures;
  - (d) responding to the PID thoroughly and impartially;
  - (e) taking appropriate action to deal with Wrongdoing; and
  - (f) keeping the Discloser informed of progress and the outcome.
13. QPAC also recognises that members of the public may have information about QPAC's operations that meets the criteria for a PID. Members of the public are encouraged to report this information. A PID made by a member of the public will be managed in accordance with QPAC's Public Interest Disclosure Procedure.

#### **Appoint PID Coordinators**

14. The Board has appointed the Director – Human Resources & Safety and one General Counsel as QPAC's PID Coordinators, with responsibility for the PID Program.
15. The role of the PID Coordinators is set out in QPAC's PID Procedure.
16. The PID Coordinators have direct access to the Board in relation to PID matters, appropriate delegated authority and access to the necessary resources to ensure that QPAC complies with its statutory obligations under the PID Act.
17. The PID Coordinators will provide regular reports on the implementation and oversight of the PID Program to the Board.

#### **Delegate PID responsibilities**

18. The PID Coordinators are responsible for ensuring that:
  - (a) All Managers are informed that they are a person who may receive a PID in accordance with section 17(3)(d) of the PID Act;
  - (b) 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;
  - (c) all 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; and

- (d) all Employees 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.

### **Implement a communication strategy**

- 19. QPAC recognises that critical to the success of its PID Program is Employee awareness of this program and QPAC's PID Procedure.
- 20. QPAC's communication strategy involves:
  - (a) all new employees are advised of QPAC's PID Procedure and PID Program at induction;
  - (b) information about PIDs is included on QPAC's intranet, including contact details for the PID Coordinators. Links are provided to the PID Procedure and PID Program, as well as to PID information on the OQO's website. The information is regularly reviewed and updated to ensure it is complete and up-to-date.
  - (c) messages from the Board that reconfirm QPAC's commitment to the PID Act, as well as other information and reminders about QPAC's PID reporting system are included periodically in QPAC's internal electronic newsletter; and
  - (d) information about making a PID, as well as QPAC's PID Procedure and PID Program are provided on QPAC's internal intranet and QPAC's public website.

### **Implement a training strategy**

- 21. QPAC recognises the importance of providing training to employees on PID issues and ensuring that ongoing training is provided.
- 22. QPAC's training strategy involves:
  - (a) a segment regarding PIDs is included as part of the mandatory Code of Conduct training provided to Employees; and
  - (b) members of the Executive Team, Managers, PID Coordinators and PID Support Officers are provided the opportunity to attend comprehensive PID training presented by OQO.

### **Analyse PIDs to inform improvements**

- 23. QPAC acknowledges the value of information obtained from PIDs in identifying systemic issues and trends and informing administrative improvements.
- 24. Following the finalisation of a PID made about QPAC or an Employee, the relevant PID Coordinator will assess whether any change is needed to QPAC's Office's service delivery, personnel management, business processes or internal controls.
- 25. The PID Coordinators will report to the Board quarterly regarding any recommendation for changes as a result of these assessments.
- 26. The PID Coordinator will conduct an annual review of the effectiveness of the PID Procedure and this PID Program and provide a report to the Board.

## ENQUIRIES

27. If you have any enquiries regarding this PID Program, please contact a PID Coordinator.

## DEFINITIONS

<b>Term</b>	<b>Definition</b>
Board	QPAC's Board. (Queensland Performing Arts Trust comprising members appointed under section 6(1) of the QPAT Act)
Discloser	A person who makes a PID.
Employees	All QPAC employees, including permanent, temporary, casual, full time, part time, variable part time and flexible part time employees
Executive Team	QPAC's Chief Executive, Executive Directors and Directors.
Manager	In relation to an Employee – a person to whom the Employee reports or a person who directly or indirectly supervises the Employee in the performance of the Employee's functions as an Employee.
Ombudsman	Queensland Ombudsman.
OQO	Office of the Queensland Ombudsman.
PID	Public Interest Disclosure.
PID Act	<i>Public Interest Disclosure Act 2010</i>
PID Coordinators	Employees nominated in the PID Procedure as Public Interest Disclosure Coordinators.
PID Program	QPAC's Public Interest Disclosure Management Program (this document).
PID Procedure	QPAC's Public Interest Disclosure Policy and Procedure.
Subject	A person who is the subject of allegations of Wrongdoing made in a PID.
PID Support Officers	Employees nominated in the PID Procedure as Public Interest Disclosure Support Officers.
Public Interest Disclosure	A disclosure of information made in accordance with Chapter 2 of the PID Act. [Section 11 PID Act] See PID Procedure.
QPAC	Queensland Performing Arts Trust.
QPAT Act	<i>Queensland Performing Arts Trust Act 1977</i>
Reprisal	See PID Procedure.
Wrongdoing	Conduct or a matter which may be disclosed as a PID. See PID Procedure.