

# **Public Interest Disclosure Management Program**











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#### 1. Statement

Ipswich City Council (Council) is strongly committed to fostering an ethical culture within the organisation. The *Public Interest Disclosure Act 2010* (the Act) provides the Chief Executive Officer (CEO) with a clear pathway to investigate and address problems that disadvantage or endanger others while providing support to Council officers who disclose suspected wrongdoing.

#### 2. Purpose and Principles

Public sector misconduct, wastage of public funds, suspected unlawful activity or danger to health, safety or the environment all erode the community's trust in public administration. Implementing this management program and associated procedures provides a roadmap to effectively manage any disclosures received in accordance with the requirements of the Act. This ensures that Council can identify and address problems as they arise and use the knowledge gained through the investigation to strengthen existing processes and/or build new processes to safeguard future operations.

#### 3. Strategic Plan Links

This management program aligns with the following iFuture 2021-2026 Corporate Plan theme:

A Trusted and Leading Organisation

## 4. Regulatory Authority

- Public Interest Disclosure Act 2010
- Public Interest Disclosure Standard No. 1/2019 Public Interest Disclosure Management Program
- Public Interest Disclosure Standard No. 2/2019 Assessing, Investigating and Dealing with Public Interest Disclosures
- Public Interest Disclosure Standard No. 3/2019 Public Interest Disclosure Data Recording and Reporting

## 5. Human Rights Commitment

Ipswich City Council (Council) has considered the human rights protected under the *Human Rights Act 2019 (Qld)* (the Act) when adopting and/or amending this policy. When applying this policy, Council will act and make decisions in a way that is compatible with human rights and give proper consideration to a human right relevant to the decision in accordance with the Act.

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#### 6. Scope

This management program and associated documents demonstrate Council's commitment to encouraging the internal reporting of wrongdoing. All employees and contractors, paid through Council's payroll system are included in the scope of this program.

## 7. Roles and Responsibilities

In accordance with Public Interest Disclosure Standard No. 1 – Public Interest Disclosure Management Program, the CEO is responsible for ensuring that Council has a management program in place and has delegated the responsibility for the implementation of the program to a responsible officer. Council's Governance and Public Interest Disclosure Coordinator has received the appropriate delegation, the necessary access to the CEO and authority to manage PIDs consistent with the requirements of the Act.

## 8. Key Stakeholders

N/A

## 9. Reporting a PID – a member of the public

A member of the public can make a disclosure to the Governance and Public Interest Disclosure Coordinator via the following methods:

Email: PIDS@ipswich.qld.gov.au

Letter: Ipswich City Council

Attn: Governance and PID Coordinator

PO Box 191

IPSWICH Q 4305

Phone: 3810 7865

#### 9. Reporting a PID – Council Officers

The following positions within council are designated to take a disclosure:

- An officer's manager or supervisor
- Governance and Public Interest Disclosure Coordinator
- Ethical Standards Manager
- Chief Audit Executive
- Manager, People and Culture
- General Managers
- Chief Executive Officer

Council has also engaged an independent external intake service, Faircall, for the purposes of providing another confidential mechanism for employees to report wrongdoings when they are not comfortable reporting such matters internally. Faircall's contact details are available on Council's intranet under the "Report a Concern" tab on the home page.

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#### 10. Training for Governance and PID Coordinator and Support Officers

The Queensland Ombudsman's Office, as the oversight agency, provides tailored training sessions for PID Coordinators and support officers. The training explains the latest legislation, policies, procedures and guidelines.

This tailored training will be provided to the relevant officers to ensure that they have the skills to undertake their roles effectively.

#### 11. Employee PID Awareness Training

As part of Council's Induction, Ethics and Code of Conduct training that is undertaken by all new employees, a presentation is provided which raises awareness of Council's PID program and resources available to learn more about this process. This presentation includes:

- how to identify wrongdoing;
- how to make a PID;
- the support and protection to be afforded to disclosers;
- how PIDS will be managed by council.

In addition, all employees undertake bi-annual online training for fraud and corruption which includes PID components to ensure continued awareness of the importance of identifying and reporting wrongdoing.

For further information, the "Report a Concern" tab on Council's intranet home page provides employee access to tailored videos created by the Queensland Ombudsman's Office relating to PIDs including:

- Rights and responsibilities of employees; and
- Obligations of managers and supervisors.

## 12. Support and Learnings

The CEO and senior managers recognise the importance of an effective PID process and are committed to working with the Governance and Public Interest Disclosure Coordinator to ensure that the rights of all officers involved in a PID case are protected including, when necessary, establishing alternate work arrangements to ensure that reprisal does not occur. If reprisal action is identified, the appropriate steps will be taken to manage same in accordance with the Act and Council's Employee Code of Conduct.

A report will be presented to the CEO at the conclusion of each investigation which will advise the findings and any identified areas where a change to internal controls or policies will strengthen existing processes to safeguard future operations.

#### 9. Monitoring and Evaluation

This management program will be reviewed in accordance with Council's four (4) year review cycle or sooner if required.

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#### 10. Definitions

## Reprisal

Reprisal occurs if a person causes or attempts to cause **detriment** to you, because they believe (whether or not this is actually the case) you:

- 1) have or intend to make a public interest disclosure; or
- 2) have or intend to participate in proceedings under the Act.

The **detriment** could be an action (or threats of action) that results in:

- 1) a physical or psychological injury;
- 2) loss or damage to property;
- 3) intimidation or harassment;
- 4) discrimination or disadvantage to your career, employment or business;
- 5) financial loss; and
- 6) damage to reputation, for example, personal, professional or business reputation.

#### 11. Related Documents

Public Interest Disclosure Policy
Public Interest Disclosure Procedure

## 12. Policy Owner

The General Manager (Corporate Services) is the policy owner and the Governance and Public Interest Disclosure Coordinator is responsible for authoring and reviewing this policy.